



# COVID-19 INDUSTRY GUIDANCE:

## Shopping Malls, Destination Shopping Centers, Strip and Outlet Malls, and Swap Meets

July 2, 2020

[covid19.ca.gov](https://covid19.ca.gov)



## OVERVIEW

On March 19, 2020, the State Public Health Officer and Director of the California Department of Public Health issued an order requiring most Californians to stay at home to disrupt the spread of COVID-19 among the population.

The impact of COVID-19 on the health of Californians is not yet fully known. Reported illness ranges from very mild (some people have no symptoms) to severe illness that may result in death. Certain groups, including people aged 65 or older and those with serious underlying medical conditions, such as heart or lung disease or diabetes, are at higher risk of hospitalization and serious complications. Transmission is most likely when people are in close contact or in a poorly ventilated area with an infected person, even if that person does not have any symptoms or has not yet developed symptoms.

Precise information about the number and rates of COVID-19 by industry or occupational groups, including among critical infrastructure workers, is not available at this time. There have been multiple outbreaks in a range of workplaces, indicating that workers are at risk of acquiring or transmitting COVID-19 infection. Examples of these workplaces include hospitals, long-term care facilities, prisons, food production, warehouses, meat processing plants, and grocery stores.

As stay-at-home orders are modified, it is essential that all possible steps be taken to ensure the safety of workers and the public.

Key prevention practices include:

- ✓ physical distancing to the maximum extent possible,
- ✓ use of face coverings by workers (where respiratory protection is not required) and customers/clients,
- ✓ frequent handwashing and regular cleaning and disinfection,
- ✓ training workers on these and other elements of the COVID-19 prevention plan.

In addition, it will be critical to have in place appropriate processes to identify new cases of illness in workplaces and, when they are identified, to intervene quickly and work with public health authorities to halt the spread of the virus.

## PURPOSE

This document provides guidance for shopping malls, destination shopping centers, strip and outlet malls, and swap meets (referred to collectively as “shopping center operators”) to support a safe, clean environment for workers, customers, and the public. Shopping center operators should ensure that lessees, including retail tenants and vendors, be made aware of the guidance that applies to their operations. Those entities are responsible for implementing the guidance, but shopping center operators should do what they can to encourage such action is taken. Shopping center operators must acknowledge that retail tenants and vendors should only open when

they are ready and able to implement the necessary safety measures to provide for the safety of their workers and customers.

**NOTE:** Shopping centers with movie theaters, restaurants, food courts, bars, spas, salons, or other personal care services should refer those retail tenants to guidance on such industries on the [COVID-19 Resilience Roadmap website](#). All public events or concentrated gatherings, including musical or other performances at shopping centers must be cancelled or postponed.

The guidance is not intended to revoke or repeal any worker rights, either statutory, regulatory or collectively bargained, and is not exhaustive, as it does not include county health orders, nor is it a substitute for any existing safety and health-related regulatory requirements such as those of Cal/OSHA.<sup>1</sup> Cal/OSHA has more safety and health guidance on their Cal/OSHA Guidance on Requirements to Protect Workers from Coronavirus [webpage](#). CDC has additional guidance [for businesses and employers](#) and specific guidance for [grocery and food retailers](#). FDA has best practices for [retail food stores, restaurants, and food pick-up/delivery services](#).

## Required Use of Face Coverings

On June 18, CDPH issued [Guidance on the Use of Face Coverings](#), which broadly requires the use of face coverings for both members of the public and workers in all public and workplace settings where there is a high risk of exposure.

People in California must wear face coverings when they are engaged in work, whether at the workplace or performing work off-site, when:

- Interacting in-person with any member of the public;
- Working in any space visited by members of the public, regardless of whether anyone from the public is present at the time;
- Working in any space where food is prepared or packaged for sale or distribution to others;
- Working in or walking through common areas, such as hallways, stairways, elevators, and parking facilities;
- In any room or enclosed area where other people (except for members of the person's own household or residence) are present when unable to physically distance;
- Driving or operating any public transportation or paratransit vehicle, taxi, or private car service or ride-sharing vehicle when passengers are present. When no passengers are present, face coverings are strongly recommended.

Complete details, including all requirements and exemptions to these rules, can be

found in the [guidance](#). Face coverings are strongly encouraged in other circumstances, and employers can implement additional face covering requirements in fulfilling their obligation to provide workers with a safe and healthful workplace. Employers should provide face coverings to workers or reimburse workers for the reasonable cost of obtaining them.

Employers should develop an accommodation policy for any worker who meets one of the exemptions from wearing a face covering. If a worker who would otherwise be required to wear a face covering because of frequent contact with others cannot wear one due to a medical condition, they should be provided with a non-restrictive alternative, such as a face shield with a drape attached to the bottom edge, if feasible, and if the medical condition permits it.

Businesses that are open to the public should be cognizant of the exemptions to wearing face coverings in the [CDPH Face Covering Guidance](#) and may not exclude any member of the public for not wearing a face covering if that person is complying with the [guidance](#). Businesses will need to develop policies for handling these exemptions among customers, clients, visitors, and workers.



## Workplace Specific Plan

- Establish a written, workplace-specific COVID-19 prevention plan at every location, perform a comprehensive risk assessment of all work areas and work tasks, and designate a person at each establishment to implement the plan.
- Incorporate the [CDPH Face Covering Guidance](#) into the Workplace Specific Plan and include a policy for handling exemptions.
- Identify contact information for the local health department where the operation is located for communicating information about COVID-19 outbreaks among workers or customers.
- Train and communicate with workers and worker representatives on the plan and make the plan available to workers and their representatives.
- Regularly evaluate the establishment for compliance with the plan and document and correct deficiencies identified.
- Investigate any COVID-19 illness and determine if any work-related factors could have contributed to risk of infection. Update the plan as needed to prevent further cases.
- Implement the necessary processes and protocols when a workplace has an outbreak, in accordance with [CDPH guidelines](#).
- Identify close contacts (within six feet for 15 minutes or more) of an infected worker and take steps to isolate COVID-19 positive worker(s) and close contacts.
- Adhere to the guidelines below. Failure to do so could result in workplace illnesses that may cause operations to be temporarily closed or limited.



## Topics for Worker Training

- Information on [COVID-19](#), how to prevent it from spreading, and which underlying health conditions may make individuals more susceptible to contracting the virus.
- Self-screening at home, including temperature and/or symptom checks using [CDC guidelines](#).
- The importance of not coming to work:
  - If a worker has symptoms of COVID-19 as [described by the CDC](#), such as a fever or chills, cough, shortness of breath or

difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting, or diarrhea, OR

- If a worker was diagnosed with COVID-19 and has not yet been released from isolation, OR
- If, within the past 14 days, a worker has had contact with someone who has been diagnosed with COVID-19 and is considered potentially infectious (i.e. still on isolation).
- To return to work after a worker receives a COVID-19 diagnosis only if 10 days have passed since symptoms first appeared, their symptoms have improved, and the worker has had no fevers (without the use of fever reducing medications) for the last 72 hours. A worker without symptoms who was diagnosed with COVID-19 can return to work only if 10 days have passed since the date of the first positive COVID-19 test.
- To seek medical attention if their symptoms become severe, including persistent pain or pressure in the chest, confusion, or bluish lips or face. Updates and further details are available on [CDC's webpage](#).
- The importance of frequent handwashing with soap and water, including scrubbing with soap for 20 seconds (or using hand sanitizer with at least 60% ethanol (preferred) or 70% isopropanol (if the product is inaccessible to unsupervised children) when workers cannot get to a sink or handwashing station, per [CDC guidelines](#)).
- The importance of physical distancing, both at work and off work time (see Physical Distancing section below).
- Proper use of face coverings, including:
  - Face coverings do not protect the wearer and are not personal protective equipment (PPE).
  - Face coverings can help protect people near the wearer, but do not replace the need for physical distancing and frequent handwashing.
  - Face coverings must cover the nose and mouth.
  - Workers should wash or sanitize hands before and after using or adjusting face coverings.
  - Avoid touching the eyes, nose, and mouth.
  - Face coverings must not be shared and should be washed or discarded after each shift.
- Information contained in the [CDPH Guidance for the Use of Face](#)

[Coverings](#), which mandates the circumstances in which face coverings must be worn and the exemptions, as well as any policies, work rules, and practices the employer has adopted to ensure the use of face coverings. Training should also include the employer's policies on how people who are exempted from wearing a face covering will be handled.

- Ensure any independent contractors, temporary, or contract workers at the facility are also properly trained in COVID-19 prevention policies and have necessary supplies and PPE. Discuss these responsibilities ahead of time with organizations supplying temporary and/or contract workers.
- Information on paid leave benefits the worker may be entitled to receive that would make it financially easier to stay at home. See additional information on [government programs supporting sick leave and workers' compensation for COVID-19](#), including workers' sick leave rights under the [Families First Coronavirus Response Act](#) and workers' rights to workers' compensation benefits and presumption of the work-relatedness of COVID-19 pursuant to the Governor's [Executive Order N-62-20](#) while that Order is still in effect.



## Individual Control Measures and Screening

- Provide temperature and/or symptom screenings for all workers at the beginning of their shift and any vendors, contractors, or other workers entering the establishment. Make sure the temperature/symptom screener avoids close contact with workers to the extent possible.
- If requiring self-screening at home, which is an appropriate alternative to providing it at the establishment, ensure that screening was performed prior to the worker leaving the home for their shift and follows [CDC guidelines](#), as described in the Topics for Worker Training section above.
- Encourage workers who are sick or exhibiting symptoms of COVID-19 to stay home.
- Employers must provide and ensure workers use all required protective equipment, including eye protection and gloves where necessary.
- Employers should consider where disposable glove use may be helpful to supplement frequent handwashing or use of hand sanitizer; examples are for workers who are screening others for symptoms or handling commonly touched items.
- Shopping centers must take reasonable measures, including posting signage in strategic and highly-visible locations, to remind workers, retail tenants, vendors, and the public that they must use face coverings and maintain physical distancing.



## Cleaning and Disinfecting Protocols

- Perform thorough cleaning in high traffic areas, such as restrooms, worker break rooms, and entrances and exits, including doors and door handles, stairways, escalator handrails, and elevator controls.
- Frequently disinfect commonly used surfaces, including benches, counters, ATM PIN pads, registers, water fountains (spout, button/lever, and nozzle), guardrails, displays, hand-held devices, shelving, customer assistance call buttons, handwashing and sanitation facilities, mall seating, touch screens, facility maps, vending machines, etc.
- Regularly clean and disinfect shared equipment between each use, such as time clocks, radios, and headsets for workers as well as wheelchairs, strollers, mobilized devices, carts, baskets, or other equipment frequently used by shoppers.
- Regularly wipe down touchable surfaces, including but not limited to working surfaces, registers, touchscreens, computer monitors, and stationary and mobile equipment controls.
- To minimize the risk of [Legionnaires' disease](#) and other diseases associated with water, [take steps](#) to ensure that all water systems and features are safe to use after a prolonged facility shutdown.
- Avoid sharing audio equipment, phones, tablets, laptops, desks, pens, and other work supplies wherever possible. Never share PPE.
- Discontinue shared use of audio headsets and other equipment between workers unless the equipment can be properly disinfected after use. Consult equipment manufacturers to determine appropriate disinfection steps, particularly for soft, porous surfaces such as foam earmuffs.
- Provide time for workers to implement cleaning practices during their shift. Cleaning assignments should be assigned during working hours as part of the workers' job duties. Procure options for third-party cleaning companies to assist with the increased cleaning demand, as needed.
- Equip customer entrances and exits, promenades, and other common-space areas with proper sanitation products, including hand sanitizer. Display signage indicating where the nearest hand sanitizer dispenser is located. Check hand sanitizer dispensers periodically and refill before they run out.
- When choosing disinfecting chemicals, employers should use products approved for use against COVID-19 on the [Environmental](#)



[Protection Agency \(EPA\)-approved](#) list and follow product instructions. Use disinfectants labeled to be effective against emerging viral pathogens, diluted household bleach solutions (5 tablespoons per gallon of water), or alcohol solutions with at least 70% alcohol that are appropriate for the surface. Provide workers training on the chemical hazards, manufacturer's directions, ventilation requirements, and Cal/OSHA requirements for safe use. Workers using cleaners or disinfectants should wear gloves and other protective equipment as required by the product instructions. Follow the [asthma-safer cleaning methods](#) recommended by the California Department of Public Health and ensure proper ventilation.

- Ensure that sanitary facilities stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer when needed.
- Encourage the use of credit cards at retail tenant and vendor locations and install hands-free devices, if possible, including motion sensor lights, contactless payment systems, automatic faucets, soap, and paper towel dispensers, and timecard systems.
- Consider installing portable high-efficiency air cleaners, upgrading the building's air filters to the highest efficiency possible, and making other modifications to increase the quantity of outside air and ventilation in offices and other spaces.
- Adjust or modify shopping center hours to provide adequate time for regular deep cleaning and product stocking.



## Physical Distancing Guidelines

- Implement measures to ensure physical distancing of at least six feet between and among workers and customers in all shopping center locations. This can include use of physical partitions or visual cues (e.g., floor markings, colored tape, or signs to indicate to where workers and/or customers should stand).
- Take measures at customer service desks or other areas where physical distancing cannot be maintained to minimize exposure between workers and customers, such as Plexiglas or other barriers.
- Consider offering workers who request modified duties options that minimize their contact with customers and other workers (e.g., managing inventory rather than working as a cashier or managing administrative needs through telework).
- On-property security staff should actively remind and encourage

customers and the public to comply with the physical distancing standards.

- Create clearly-marked curbside or outside pickup points, that maintain physical distance with visual cues or other measures, and have purchased goods available there or available through home delivery.
- Shopping center operators, retail tenants, and vendors should also identify additional strategies to increase pickup and delivery service options for customers to help minimize in-store contact and maintain physical distancing, such as online ordering and returns-processing from shoppers' vehicles with no direct hand-off of items.
- Develop and implement controlled foot traffic and crowd management strategies that enable at least six feet physical distancing between customers. This can include requiring foot traffic be one-directional and guiding customers with visual cues, physical props, and signage. Provide clearly designated entrances and separate exits, if feasible and appropriate for the space, to help maintain physical distancing and support crowd control. Wherever possible, doors should be left open if they do not open and close automatically. Work with tenants to create queue systems for customers outside individual stores while still maintaining physical distance, if necessary.
- Shopping center operators, retail tenants, and vendors should collaborate to develop store entry queuing systems that do not disrupt foot traffic or violate physical distancing requirements. Consider and encourage alternate entry to retail tenant facilities, including digital reservations for entry and pre-order guidelines.
- Vendor carts or kiosks should only be permitted to operate in shopping center aisles or walking areas if they do not interfere with updated foot traffic measures or inhibit physical distancing requirements. Reconfigure vendor carts or kiosks, where necessary, to ensure queuing does not impede physical distancing requirements.
- Adjust maximum occupancy rules based on the size of indoor facilities and individual stores to limit the number of people in the shopping center at one time. Capacity limits should be low enough to ensure physical distancing but in no case more than 50% maximum occupancy of overall indoor shopping center capacity. Limit parking availability, where feasible, to further enforce the revised maximum occupancy limits.
- Maximum occupancy rules for outdoor shopping centers should be evaluated to ensure physical distancing requirements can be maintained. Open-air shopping centers, such as swap meets, should

ensure that vendors space tables, tents, and other displays are in accordance with appropriate physical distancing requirements or ensure other impermeable barriers are in place.

- Shopping center operators should collaborate with retail tenants and vendors to identify opportunities that make use of unused or reconfigured real estate for revenue-generating opportunities in accordance with local regulations and that support physical distancing requirements. This could include expanding restaurant dining space in real estate managed by the shopping center operator, e.g. promenades or modified parking spaces.
- Work with retail tenants and vendors to consider dedicated shopping hours for vulnerable populations, including seniors and those medically vulnerable, preferably at a time following a complete cleaning.
- Children's play areas and other amenities like carousels, rides, or arcades must be closed.
- Chairs, seating, benches and other public spaces should be reconfigured to enable physical distancing requirements.
- Hold meetings over the phone or via webinar for workers wherever possible. If not feasible, adjust staff meetings to ensure physical distancing and use smaller individual meetings at facilities to maintain physical distancing guidelines. Place additional limitations on the number of workers in enclosed areas to ensure at least six feet of separation to limit transmission of the virus.
- Close breakrooms, use barriers, or increase distance between tables/chairs to separate workers and discourage congregating during breaks. Where possible, create outdoor break areas with shade covers and seating that ensures physical distancing. Stagger worker breaks, in compliance with wage and hour regulations, to maintain physical distancing protocols.
- Implement physical distancing requirements at loading bays and move to contactless signatures for deliveries.

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<sup>1</sup>Additional requirements must be considered for vulnerable populations. Shopping center operators must comply with all [Cal/OSHA](#) standards and be prepared to adhere to its guidance as well as guidance from the [Centers for Disease Control and Prevention \(CDC\)](#) and the [California Department of Public Health \(CDPH\)](#). Additionally, employers should be prepared to alter their operations as those guidelines change.

