

COVID-19 INDUSTRY GUIDANCE: Indoor and Drive-in Movie Theaters

October 20, 2020

This guidance is designed to address sectors and activities opening statewide. However, local health officers may implement more stringent rules tailored to local epidemiological conditions, so employers should also confirm relevant local opening policies

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, restaurants, 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,
- ✓ 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 movie theater operators to support a safe, clean environment for workers and customers. Businesses must identify and monitor the County Risk Level for the county the business is operating in and make required adjustments to their operations:

- **Purple – Widespread – Tier 1:** Outdoor operations are permitted and must follow the modifications in this guidance.
- **Red – Substantial – Tier 2:** Indoor operations are permitted but must be limited to 25% capacity or 100 people, whichever is fewer, and must follow the modifications in this guidance.
- **Orange – Moderate – Tier 3:** Indoor operations are permitted but must be limited to 50% capacity or 200 people, whichever is fewer, and must follow the modifications in this guidance.
- **Yellow – Minimal – Tier 4:** Indoor operations are permitted at 50% capacity and must follow the modifications in this guidance.

For the most updated information on county tier status, visit [Blueprint for a Safer Economy](#). Please note that local health departments can have more restrictive criteria and different closures. Find [your county's local information](#).

NOTE: Movie theaters with convention space, rentable meeting rooms, other areas for private events such as birthday parties, etc., should keep those areas closed until such activities are allowed to resume modified or full operation through a specific reopening order and guidance.

This 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.¹ Stay current on changes to public health guidance and state/local orders, as the COVID-19 situation continues. Cal/OSHA has more comprehensive guidance on their [Cal/OSHA General Guidelines on Protecting Workers from COVID-19 webpage](#). CDC has additional requirements in their [guidance](#) for businesses and employers.

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. Complete details, including all requirements and exemptions to these rules, can be found in the [guidance](#).

The [CDPH Face Covering Guidance](#) is subject to additional updates based on the current scientific understanding of transmission of the virus causing COVID-19. Please check the CDPH website for any revisions.



Workplace Specific Plan

- Establish a written, workplace-specific COVID-19 prevention plan at every facility, perform a comprehensive risk assessment of all work areas and work tasks, and designate a person at each facility 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 facility is located, for communicating information about COVID-19 outbreaks among workers.
- Train and communicate with workers and worker representatives on the plan and make the plan available to workers and their representatives.
- Regularly evaluate the facility 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](#) and orders or guidance from the local health department.
- 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.
- Notify all employees in writing, and employers of subcontracted employees, who may have been exposed to COVID-19 and report workplace outbreaks to the local health department. For additional information on employer responsibilities under [AB 685](#) (Chapter 84, Statutes of 2020), refer to the [Enhanced Enforcement and Employer Reporting Requirements](#) from Cal/OSHA and the [Employer Questions about AB 685](#) from CDPH.
- 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 [people are at higher risk](#) for severe illness or death.

- 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 after meeting [CDPH Guidance on Returning to Work or School Following COVID-19 Diagnosis](#).
- 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](#)). Never use hand sanitizers with [methanol](#) due to its high toxicity to both children and adults.
- 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 are not personal protective equipment (PPE).
 - Face coverings 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](#).



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 and visitors 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. Workers should wear gloves when handling items contaminated by body fluids.
- Employers must take reasonable measures, including public address announcements, posting signage in strategic and highly-visible locations, and in reservation confirmations, to remind the public that they must use face coverings, practice physical distancing, not touch their face, frequently wash their hands with soap for at least 20 seconds, and use hand sanitizer.

- Remind guests in advance to bring a face covering, otherwise they should not be allowed to enter the premises (unless exempt from wearing face coverings as stated in the [CDPH Face Covering Guidance](#)). Consider making face coverings available for guests who may arrive without them.
- Guests and visitors should be temperature and/or symptom screened upon arrival, asked to use hand sanitizer, and to bring and wear a face covering when not eating or drinking (unless exempt from wearing face coverings as stated in the [CDPH Face Covering Guidance](#)).
- Display a set of clearly visible rules for customers and personnel at entrance(s) that are to be a condition of entry. The rules could include instructions to use hand sanitizer, maintain physical distance from other customers, avoid unnecessary touching of surfaces, contact information for the local health department, and changes to services. Whenever possible, the rules should be available digitally, include pictograms, etc.



Ventilation, Cleaning, and Disinfecting Protocols

- Where possible, install portable high-efficiency air cleaners, upgrade the building's air filters to the highest efficiency possible, and make other modifications to increase the quantity of outside air and ventilation in offices and other indoor spaces.
- Check the [CDPH website](#) periodically for updates on indoor air quality and ventilation guidance for airborne diseases in indoor settings.
- Perform thorough cleaning in high traffic areas such as customer waiting areas and lobbies, worker break rooms, etc., and areas of ingress and egress, including stairways and elevator banks. Frequently disinfect commonly used surfaces, including counters, credit card machines, touchscreens, buttons, doorknobs, armrests, toilets, hand washing facilities, etc.
- Disinfect shared items between each use.
- Provide hand sanitizer dispensers throughout operational areas for use by customers and workers. Remind members of the public (with signs and/or verbally) not to touch their eyes, nose, and mouth.
- Provide disposable or single-use items whenever possible, such as 3D glasses. If disposable replacements cannot be provided, properly disinfect items before and after customer use.
- Thoroughly clean and disinfect each customer activity area after every use. This can include disinfecting tables, chairs, booster seats, booths,

touch screens, etc. Allow adequate time for proper disinfection, following product instructions. Environmental Protection Agency-approved disinfectants require a minimum contact time (seconds to minutes) to be effective against human coronavirus.

- Regularly clean and disinfect surfaces shared by workers between shifts or between users, whichever is more frequent, including but not limited to working surfaces, time clocks, copy machines, keys, cleaning equipment, gaming machinery, etc. Avoid sharing equipment such as phones, tablets, office machinery, and tools wherever possible. Never share PPE.
- Provide time for workers to implement cleaning practices during their shift. Assign cleaning assignments during working hours as part of the employee's job duties. Procure options for third-party cleaning companies to assist with the increased cleaning demand, as needed.
- Equip terminals, desks, and help counters with proper sanitation products, including hand sanitizer and disinfectant wipes, and provide personal hand sanitizers to all staff directly assisting customers.
- Ensure that sanitary facilities stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer when needed.
- Provide resources to promote employees' personal hygiene. This will include tissues, no-touch trash cans, hand soap, adequate time for handwashing, alcohol-based hand sanitizers, disinfectant wipes, and disposable towels.
- When choosing disinfecting chemicals, 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 must 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.
- To minimize the risk of [Legionnaires' disease](#) and other diseases associated with water, [take steps](#) to ensure that all water systems and features (e.g., drinking fountains, decorative fountains) are safe to use after a prolonged facility shutdown.
- Adjust or modify facility hours to provide adequate time for regular thorough cleaning.
- Install and encourage the use of credit cards and hands-free devices, if

possible, including motion sensor lights, contactless payment systems, automatic soap and paper towel dispensers, and timecard systems.

- Where possible, do not clean floors by sweeping or other methods that can disperse pathogens into the air unless all persons in the area have appropriate PPE. Use a vacuum with a HEPA filter wherever possible.



Physical Distancing Guidelines

- **WARNING:** physical distancing alone is insufficient to prevent transmission of COVID-19.
- Limit customer groups to a household unit. People from the same household do not need to be six feet apart.
- Movie theaters that offer food and drink concessions should encourage customers to order online or over the phone, whenever possible, and make items available for counter pick-up. Use visual cues to ensure customers maintain physical distances of at least six feet while waiting in line. Install impermeable barriers at concession counters, if possible.
- Implement timed and/or advanced reservation ticketing systems and pre-assigned seating or activity areas, whenever possible, to stagger customer visits and help maintain physical distances. Ask visitors to wait in their vehicle until their reservation time and to arrive and leave in a single group to minimize crossflow of visitors and staff.
- Dedicate staff to manage movement of customers when activities could bring people within six feet of distance from each other, such as ushering customers to seats, preventing congregation in bottleneck areas, etc.
- Implement measures to ensure physical distancing of at least six feet between people, such as when customers are waiting in line. This can include use of physical partitions or visual cues (e.g., floor markings or signs to indicate to where workers and customers/visitors should stand).
- Install impermeable barriers where physical distancing cannot be maintained to minimize exposure between workers and customers.
- All workers should minimize the amount of time spent within six feet of guests.
- Designate separate routes for entry and exit into facilities, seating areas, work areas, etc., if possible, to help maintain physical distancing and lessen the instances of people closely passing each other. Establish one-way directional hallways and passageways for foot traffic, if possible, to eliminate workers and guests from passing by one another.
- 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).

- Reconfigure workspaces, if possible, to allow for six feet between workers. Hold smaller meetings at facilities to maintain physical distancing guidelines and consider holding meetings outside or via online platforms or telephone.
- Ensure workers can maintain physical distance in breakrooms, using barriers, increasing distance between tables/chairs to separate workers, etc. Where possible, create outdoor break areas with shade coverings and seating arrangements that ensures physical distancing. Discourage workers from congregating during breaks and ensure they are not eating or drinking without face coverings within six feet of each other.
- Place additional limitations on the number of workers in enclosed areas, such as supply rooms and counter areas, to ensure at least six feet of separation to limit transmission of the virus.
- Stagger worker breaks, in compliance with wage and hour regulations, to maintain physical distancing protocols.
- Redesign parking lots to limit congregation points and ensure proper separation (e.g., every other space, contactless payment, etc.)



Additional Considerations for Indoor Movie Theaters

- Implement a reservation system to limit the number of attendees entering the theater at a time whenever possible. Designate arrival times as part of reservations, if possible, so that customers arrive at and enter the theater in staggered groups.
- Establish directional entry and exit into theaters where possible.
- Reconfigure, close, or otherwise remove seats from use to ensure physical distancing of at least six feet between attendees. This may require seating every other row or blocking off or removing seats in a “checkerboard” style (use each row but make sure no one is directly behind other patrons) so that distances are maintained in all directions. Members of the same household may be seated together but should maintain at least six feet of distance from other households.
- Dedicate staff to help people maintain distances before and after screenings. This could include ushering to seats prior to the start of a show and dismissing customers in an orderly fashion to reduce the crossflow of traffic or crowding in exit rows.

- Consider using disposable or washable seat covers in theaters, particularly on porous surfaces that are difficult to properly clean. Discard and replace seat covers between each use.
- Prop or hold doors open during peak periods when attendees are entering and exiting facilities, if possible and in accordance with security and safety protocols.
- Consider limiting the number of people that use the restroom at one time to allow for physical distancing.



Additional Considerations for Drive-In Movie Theaters

- Reconfigure parking spaces to ensure that vehicles have at least six feet of distance between them.
- Each vehicle may only be occupied by members of the same household who have already been in close contact with each other. If not utilizing restroom facilities or picking up concessions, patrons must remain in their vehicles. Patrons cannot sit outside of their vehicles, e.g., to view a drive-in movie near their vehicle.
- Ensure regular cleaning and disinfecting of on-site restrooms.
- Cashless and touchless transactions systems are preferred wherever possible. If available, orders, reservations and payments for the drive-in business should be made in advance online or over the phone.
- Drive-in movie theater concessions should be ordered online or over the phone, if possible, and be available for curbside pick-up. Walk-up concession services should be available for pick-up of pre-ordered items. If pre-ordering items is not possible, ensure that customers maintain proper physical distancing when waiting to order food items.
- Drive-in movie theaters should suspend double-feature offerings avoid the need for intermissions.

¹ Additional requirements must be considered for vulnerable populations. Employers must comply with all [Cal/OSHA](https://www.dir.ca.gov/CalOSHA/) standards and be prepared to adhere to its guidance as well as guidance from the [Centers for Disease Control and Prevention \(CDC\)](https://www.cdc.gov/) and the [California Department of Public Health \(CDPH\)](https://www.cdph.ca/). Additionally, employers must be prepared to alter their operations as those guidelines change.

