

# Phase 1 Curbside Retail COVID-19 Requirements

For the purposes of this document, this does not include requirements for in-store retail activity. In-store retail activity is not authorized under these Phase 1 requirements.

## Safety and Health Requirements

All curbside retail establishments have a general obligation to keep a safe and healthy facility in accordance with state and federal law, and comply with the following COVID-19 worksite-specific safety practices, as outlined in Governor Jay Inslee's "Stay Home, Stay Healthy" Proclamation 20-25, and in accordance with the Washington State Department of Labor & Industries [General Requirements and Prevention Ideas for Workplaces](#) and the Washington State Department of Health Workplace and Employer Resources & Recommendations at <https://www.doh.wa.gov/Coronavirus/workplace>.

Employers must specifically ensure operations follow the main L&I COVID-19 requirements to protect workers, including:

- Educate workers in the language they understand best about coronavirus and how to prevent transmission and the employer's COVID-19 policies.
- **Maintain minimum six-foot separation between staff and customers in all interactions at all times.** When strict physical distancing is not feasible for a specific task, other prevention measures are required, such as use of barriers, minimize staff or customers in narrow or enclosed areas, stagger breaks, and work shift starts.
- Provide personal protective equipment (PPE) such as gloves, goggles, face shields and face masks as appropriate or required to employees for the activity being performed. **Cloth facial coverings must be worn by every employee on the jobsite unless their exposure dictates a higher level of protection under Department of Labor & Industries safety and health rules and guidance.** Refer to [Coronavirus Facial Covering and Mask Requirements](#) for additional details. A cloth facial covering is described in the Department of Health guidance, <https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/ClothFacemasks.pdf>.
- Ensure frequent and adequate hand washing with adequate maintenance of supplies. Use disposable gloves where safe and applicable to prevent transmission on tools or other items that are shared.
- Establish a housekeeping schedule that includes frequent cleaning and sanitizing with a particular emphasis on commonly touched surfaces.
- Screen employees for signs/symptoms of COVID-19 at start of shift. Make sure sick employees stay home or immediately go home if they feel or appear sick. Cordon off any areas where an employee with probable or confirmed COVID-19 illness worked, touched surfaces, etc. until the area and equipment is cleaned and sanitized. Follow the [cleaning guidelines set by the CDC](#) to deep clean and sanitize.

A site-specific COVID-19 Supervisor shall be designated by the employer at each job site to monitor the health of employees and enforce the COVID-19 job site safety plan.

A worker may refuse to perform unsafe work, including hazards created by COVID-19. And, it is unlawful for their employer to take adverse action against a worker who has engaged in safety-protected activities under the law if their work refusal meets certain requirements.

Employees who choose to remove themselves from a worksite because they do not believe it is safe to work due to the risk of COVID-19 exposure may have access to certain leave or unemployment benefits. Employers must provide high-risk individuals covered by Proclamation 20-46 with their choice of access to available employer-granted accrued leave or unemployment benefits if an alternative work arrangement is not feasible. Other employees may have access to expanded family and medical leave included in the Families First Coronavirus Response Act, access to use unemployment benefits, or access to other paid time off depending on the circumstances.

### **Curbside Retail Operations specific requirements**

1. In-store operations should be limited to those employees who are responsible for the operations required for curbside delivery. Employees should adhere to all social distancing, hygiene, and sanitation guidelines.
2. Customer transactions may be handled through multiple channels, including phone transactions, on-line transactions, or point-of-sale transactions.
3. Designated employees will deliver products directly to the customer through curbside drop-off.
  - a. Products should be placed directly in a customer's vehicle when possible.
  - b. If delivered to a home or business, merchandise should be placed on the doorstep or another agreed upon location outside of the residence or business.
  - c. Customers are urged to use face coverings during delivery to the curb, residence, or business.
  - d. All delivery tools (e.g. hand trucks and dollies) shall be sanitized frequently throughout the day.
4. Designated pickup areas may be determined by the shopping center or by the specified retailer for safe transfer of merchandise and delivery to the customer. Downtown or main street retailers may offer curbside delivery options.
  - a. Drop off areas can be color-coded or marked in a manner that allows customer to easily locate the delivery area.
5. The customer will notify the retailer by text message, email, or phone once they arrive. The customer should be asked to remain in their vehicle until the store employee safely delivers the purchase.
6. Retailers must develop individualized store guidelines based on their merchandise, store footprint, location, and curbside/parking options.

### **Curbside Retail Specific Health Protocols**

7. Sanitation
  - a. Providing disinfectant and sanitation products for workers to clean their workspace, equipment, tools, and common areas.

- b. Placement of hand sanitizer at check-out counters and distributed throughout the retail business, storage areas, and administrative offices.
- c. Frequent sanitization of working surfaces, particularly check-out counters, electronic pin pads, and other areas contacted by customers and employees.
- d. Require hourly hand washing or sanitation by employees.
- e. No physical contact with a customer, vendor, or supplier is permitted under any circumstances.

#### 8. Employees

- f. Stagger shifts to limit the number of employees in the business at one time.
- g. Prohibit gatherings of employees:
  - i. Stagger break time, limit the number of people in break rooms, and rearrange break room furniture as needed to abide by distancing standards;
  - ii. Permit workers to take breaks and meals outside, in their office or personal workspace, or in such other areas where proper social distancing is attainable.
- h. Encourage “working from home” for all employees who can perform needed functions remotely.
- i. Hold all meetings and conferences virtually, wherever possible.

#### 9. Payment

- j. Retail establishments must use electronic payment methods to reduce handling of currency between employee and customer whenever possible. If payment by currency is the only possible method of transaction, employees must adhere to social distancing and sanitation standards in this document.

#### 10. Returns and Exchanges:

- k. Modify return and exchange policies to establish procedures for processing, handling, and disinfecting returns and exchanges such as:
  - i. Require returned items to be sealed and stored separately.
  - ii. Employees who process returned items need proper PPE.
  - iii. Disinfect items and store them in isolation for a safe time period before returning them to active inventory.

### **Sick Employee Plan**

- 11. Screen all workers at the beginning of their day by asking them if they have a fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell.
- 12. Ask employee to take their temperature at home prior to arriving at work or take their temperature when they arrive. Thermometers used shall be ‘no touch’ or ‘no contact’ to the greatest extent possible. If a ‘no touch’ or ‘no contact’ thermometer is not available, the thermometer must be properly sanitized between each use. Any worker with a temperature of 100.4°F or higher is considered to have a fever and must be sent home.
- 13. Create policies which encourage workers to stay home or leave the location when feeling sick or when they have been in close contact with a confirmed positive case. If they develop symptoms of acute respiratory illness, they must seek medical attention and inform their

employer.

14. Have employees inform their supervisors if they have a sick family member at home with COVID-19. If an employee has a family member sick with COVID-19, that employee must follow the isolation/quarantine requirements as established by the State Department of Health.
15. Instruct workers to report to their supervisor if they develop symptoms of COVID-19 (e.g., fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell). If symptoms develop during a shift, the worker should be immediately sent home. If symptoms develop while the worker is not working, the worker should not return to work until they have been evaluated by a healthcare provider.
16. If an employee is confirmed to have COVID-19 infection, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA). The employer should instruct fellow employees about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure.

### **Training**

17. All on-site employees must be trained on the worksite's policies, these requirements and all relevant sanitization and social distancing protocols. They must also be trained about COVID-19 and how to prevent its transmission. This can be accomplished through weekly safety meetings, where attendance is logged by the system, supervisor, or COVID site supervisor.

**No curbside retail establishment may operate until they can meet and maintain all the requirements in this document, including providing materials, schedules and equipment required to comply. Additional considerations are made as suggestions and may be adopted, as appropriate.**

All issues regarding worker safety and health are subject to enforcement action under L&I's Division of Occupational Safety and Health (DOSH).

- Employers can request COVID-19 [prevention advice and help](#) from L&I's Division of Occupational Safety and Health (DOSH).
- Employee Workplace safety and health complaints may be submitted to the L&I DOSH Safety Call Center: (1-800-423-7233) or via e-mail to [adag235@lni.wa.gov](mailto:adag235@lni.wa.gov).
- General questions about how to comply with the agreement practices can be submitted to the state's Business Response Center at <https://coronavirus.wa.gov/how-you-can-help/covid-19-business-and-worker-inquiries>.
- All other violations related to Proclamation 20-25 can be submitted at <https://bit.ly/covid-compliance>.