MICHIGAN DEPARTMENT OF
LABOR & ECONOMIC OPPORTUNITY

Department of Labor and Economic Opportunity
Employer guidance on best practices: Restaurant / Bar

PRELIMINARY AND PRE-DECISIONAL | MAY 18TH, 2020

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Eight steps for employers to keep their workers safe, within the hierarchy of controls

1 Administrative controls

2 Access control

3 Distancing

4 Sanitation

5 Hygiene

6 PPE

7 Positive case protocols

8 Facility closure

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1 **Administrative controls**

Create an exposure control plan

- Document and share written exposure control plan to mitigate employee exposure

- This plan should include an exposure risk determination for all employees, and detail measures employer will take to prevent exposure, including:

  – Administrative controls, including restaurant access

  – Engineering controls, including any steps taken to physically reconfigure the restaurant's seating arrangement / floor plan and other workspaces

  – Policies governing social distancing

  – Policies governing personal hygiene

  – Policies governing cleaning and disinfection

  – Policies governing personal protective equipment

  – Policies governing

- The exposure control plan should incorporate the latest guidance for COVID-19 from the Center for Disease Control and Prevention (CDC), and any federal requirements issued by: federal, state, county, and municipal authorities; employers; and project owners

- The exposure control plan may differentiate between workers commensurate with their exposure risk, with more stringent measures for higher risk categories

1 **Administrative controls**

Establish response owners

- Employers should designate a simple responsible party for the restaurant's COVID-19 readiness / response for each shift

- Employers should consider making this duty exclusive / freeing up other job responsibilities

Define the scope of the response team, including:

- Ensure robust implementation of safety protocols, by both employees and customers

- Ensure that operations are compliant with CDC, MiOSHA, MDHHS, and Governor's Executive Orders (as well as relevant best practices issued by industry associations like MLRA and MLBA)

- Ensure completion of daily "checklist" items, including facility cleaning and relevant food safety guidelines

- Share notice both on-site and digitally, if possible, to explain new / evolving policies with all restaurant employees

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1 **Administrative controls**

Train employees

- All employers should conduct an all-hands check-in, with each individual shift, before resumption of work

- The curriculum of this training should:

  - Explain all elements of the exposure control plan, with specific guidance on access control, distancing, sanitation, hygiene, and use of personal protective equipment

  - Include demonstration of proper use of personal protective equipment, including donning and doffing

  - Explain worker's rights and protections, including access to leave, and specify the steps that the employee can take if they feel unsafe in the workplace

- Training should be jointly led by the ranking manager on the jobsite, a labor union representative if applicable, and designated members of the COVID-19 response team
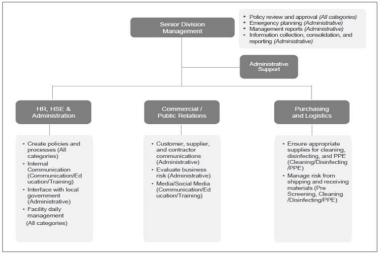
Administrative controls: example

Illustrative
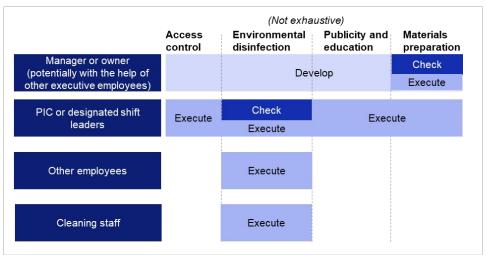
1 **Administrative controls**

Establish team or roles

Example: Large restaurant chain plan

Policy modifications can be developed at a corporate level and communicated to franchisee owners for execution (monitored by corporate field teams virtually)

Example: Small restaurant plan

(Not exhaustive)

	Access control	Environmental disinfection	Publicity and education	Materials preparation
Manager or owner (potentially with the help of other executive employees)		Develop		Check / Execute
PIC or designated shift leaders	Execute	Check / Execute	Execute	
Other employees		Execute		
Cleaning staff		Execute		

All team members likely to dedicate some, not all of their time developing/ executing health practices

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2 Access control

Limit capacity

- Limit indoor seating capacity to 50% of normal capacity

Reduce congestion at start times and entry points

- Employers should consider closing waiting areas and asking customers to wait in cars, to mitigate congestion at the front of the restaurant

- Employers should consider leveraging call-ahead seating or reservations to reduce crowding in entryways

- Employers should demarcate entryways with floor markings to enforce 6-foot spacing

Screen employee health / exposure:

- Employers should conduct daily entry self-screening protocol for all employees i.e., symptom tracking and exposure questionnaire

- Employers should take worker temperatures onsite as a condition for daily entry, if feasible

- Workers should be barred entry if they have a fever (100.4'F based on temperature checks); or otherwise if the employee identifies coughing, or shortness of breath each day before leaving for work, before the shift, mid-shift, and at end of shift

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2 **Access control**

Screen customers

- Employers should post signage at the front of the restaurant specifying that customers who are experiencing symptoms should return to their vehicle for a takeout meal

- Employers should consider administering a questionnaire outside the restaurant or in waiting areas to screen potential diners for symptoms

- Hosts should ask groups upon entry, call-ahead, or reservation if their party is in good health

- Employees should be educated on protocols if customer indicates that they are currently experiencing symptoms

Restrict entry of third parties

- Place signage on delivery doors for all to wear mask (including delivery personnel)

- Employers should have suppliers deliver / enter off peak hours, if feasible, and consider setting times that separate delivery from heavy customer traffic

If possible, modify transportation practices

- If transportation is employer owned / managed, employer should consider utilizing assigned seating to simplify contact tracing should an employee be diagnosed as COVID-19 positive

- Employers should work with transportation provider(s) to review health screening (reducing shift changeover time) and disinfection protocols for seats and other common surfaces

2 **Access control**

Access control: example

2 **Access control**

Questions:

Enter the team member EmplID (If KBS, Paramount or Serv U, enter name) * Required Response

Do you have any new and unusual of the following symptoms: fever greater than 100.4 degrees F, cough, difficulty breathing or shortness of breath, diarrhea, chills or sore throat? * Required Response

☐ Yes
☐ No

If a touchless thermometer has been provided to your store, confirm the team member's temperature below.

Select N/A if no thermometer has been provided * Required Response

☐ Yes (Temperature is > 100.4° F)
☐ No (Temperature is <= 100.4° F)
☐ N/A

Have you had or have you been notified that you have had close contact with a person that has been diagnosed with COVID-19 through a positive test result? * Required Response (does not apply to Pharmacists or Pharmacy Techs)

☐ Yes
☐ No

Have you travelled internationally or domestically (i.e. air travel or cruise) within the last 14 days?
* Required Response (does not apply to Pharmacists or Pharmacy Techs)

☐ Yes
☐ No

If "Yes" was answered to any questions above:
- The team member is not permitted to work that day
- The team member must contact ILM at 1-800-854-7062
- The team leader must enter 2 hours of pay for the team member

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3 **Social distancing**

Increase distance between people

- Employers must increase separation between tables / parties to ensure 6-foot distancing, and consider removing chairs / barstools that will not be in use

- Employers must establish sitewide requirement for social distancing in accord with CDC guidelines (6 ft) [When 6 ft distancing is not feasible, as in the kitchen, workers should leverage facial coverings; see PPE section for additional guidance]

- Employers should take steps to limit the number of employees in the kitchen (may include prep time)

- Employers should consider installing physical barriers between workers when possible (create map for guidance to employees) – restrictions for size, cleanliness, and flammability

- Employers should consider limiting the number of people in the restroom by closing stalls

- Employers should mark pathways for foot traffic, to create one-way flow of foot traffic through the restaurant if feasible

- Employers should consider establishing consistent policy for reservation only or call ahead queuing from vehicle so host stand does not get crowded

- Employers should install shields for drive thru windows

- Employers should limit shared items for customers (e.g., condiments, menus) and clean high-contact areas after each customer (e.g., tables, chairs, menus, payment tools, condiments

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Provide visual cues and physical barriers to reinforce distancing expectations

- Employers should employ visual cues to enforce distancing wherever possible (e.g., tape, ground markings, walking traffic patterns marked, physical barriers, elevator guidelines, signs with social distancing requirements)

- Employers should install physical barriers, such as sneeze guards and partitions at cash registers, bars, host stands, and other areas where maintaining physical distance of six feet may be difficult

③ Social distancing

Illustrative

3 **Social distancing**

Increase distancing for customer interaction

Examples with visual reinforcements (e.g., X's)

Increase distancing for employee to customer

Examples with visual reinforcements (e.g., X's)

4 Hygiene

Provide handwashing / sanitation options

- Employers must continue to follow all protocols for hygiene and food safety specified by FDA and MDARD

- Employers should provide soap and running water wherever possible on job sites to permit frequent handwashing

- Alcohol-based sanitizers (greater than 60% ethanol or 70% isopropanol) should be provided as a backup, only in the event that providing supply of running water is impossible

- Employers should provide individual hand sanitizer bottles to workers, and position extra hand sanitizer in areas next to shared tools, equipment, and materials

- Employers should develop policies specifying that handwashing is required for all workers at the start of the shift, breaks, bathroom trips, lunch, team huddles, at the end of the shift, and after any close contact with someone displaying cough or cold symptoms

- Employers should post signage for hygiene (wash hands, cover cough, don't touch face)

5 **Hygiene**

Conduct more frequent cleaning

- Employers should fully disinfect dining areas and common surfaces prior to site reopen

- Employers should identify responsible for party for cleaning / sanitation on each shift (e.g., one person/shift or every worker), and clearly communicate this to employees

- Employers should frequently clean and disinfect high touch surfaces on job sites

  - "High touch surfaces" will include shared tools and other equipment, handrails, doorknobs, etc. frequently, per CDC guidelines; for shared items like tools, wipe with disinfectant before being transferred

  - Employers should more frequently clean toilets and restroom areas

- If feasible, employers should ensure optimal turnover of fresh/clean air on site if enclosed (e.g. bay and other doors/windows opened where feasible)

Provide cleaning materials and establish protocols

- Employers should provide disinfecting materials, EPA-approved for emerging viral pathogens

- Employers should create policies governing cleaning shared tools among other items, and require disinfection at the beginning and end of individual usage

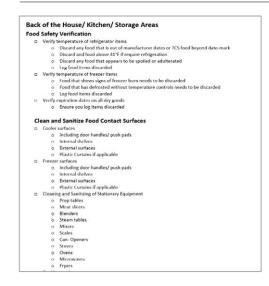- Employers should provide time for employees to clean at the start and end of shifts
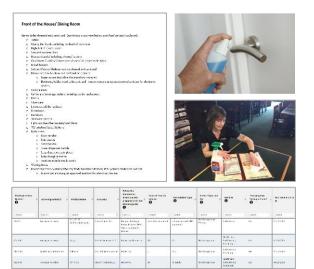
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Illustrative

5 Hygiene

Conduct frequent cleaning of kitchen

Conduct frequent cleaning of front-of-house and post protocols publicly

Supply guidance and conduct audit checks for cleaning procedures (including deep clean as needed)

https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2

http://npic.orst.edu/ingred/ptype/amicrob/covid19.html

https://www.servsafe.com/Landing-Pages/Free-Courses

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6 **PPE**

Enforce PPE use

- Employers should analyze and understand requirements (consistent with guidance and requirements issued by: Federal, state, county / municipal authorities, employers, owners)

- Employers must require employees to wear face coverings and gloves in the kitchen area when handling food, consistent with guidelines from the FDA

- Employers should require that employees use facial coverings before employees approach the facility entrance check point

- Employers should require that facial coverings be worn by all employees who cannot consistently maintain 6 ft of separation from other employees (provided by employer), as appropriate and dictated by activity

Distribute PPE

- Employers should ensure all employees (food prep, waiters, hosts, bussers) have facial coverings (e.g., distribute in the morning: 1mask/day for kitchen staff, 2mask/week or cloth masks for others – follow public health specifications)

- Employers should record and track who has received their masks (e.g., weekly allotment for employees)

6 **PPE**

Enforce PPE use in front of house

- Employers should ensure hosts and servers wear masks in the dining area to encourage safety and proper hygiene

- Employers should encourage customers wear face coverings before they get to their table (e.g., post signage)

- Employers should adapt other PPE requirements (e.g., gloves) to reflect increased risk of viral transmission

Provide guidance on PPE

- Employers should communicate guidance on PPE use while in the restaurant to individual employees

- Employers should train employees on the use of PPE (including storage, doffing and re-donning facial covering), in addition to the protective triad of personal hygiene, social distancing and frequent disinfection

- Employers should permit voluntary individual use of masks in excess of guidelines

- In case of any conflict between any of foregoing guidance, the strictest measure should apply

PPE: example

Illustrative

6 PPE

Ensure PPE (masks, hand sanitizer) is stocked

Cloth mask (form fitting to the face)

Surgical mask

Enforce mask usage in front-of-house

https://www.feedingus.org/

Enforce glove/mask usage in back-of-house

https://app1.unmc.edu/nursing/heroes/mpv.cfm?updateindex=132&src=yt

Use tamper proof packaging for delivery

7 **Case monitoring**

Define protocols for symptomatic employees

- Employers should ensure that employees with symptoms (based on self assessment, screening etc.) are sent home

- Employers should instruct that sick employees stay home in accordance with most recent Executive Orders

- Employers should ensure protocols are visible in the facility (e.g., post signage to stay at home if specified symptoms occur)

- Employers should ensure isolation protocol and areas established to isolate symptomatic employees prior to sending to medical care or home to self-quarantine

- Employers should identify and train Isolation Coordinator(s) for on-site assistance

- Employers may also provide guidance where appropriate and support for employees (e.g. virtual training, etc.)

- Employers should check in periodically with employee on symptoms and work ability

- Employer should report confirmed cases and outbreaks to state and local public health authorities, including any relevant information on circumstances of transmission and contacts of the infected worker

7 **Case monitoring**

Provide guidance to exposed employees

- Employers should follow CDC response guidelines for exposure cases

- Employers should inform team members and relevant managers of their potential exposure when employee is sent home

- Employers should enact policies to encourage workers to stay home / leave worksite (e.g., temp paid sick leave) when feeling sick, or after close contact with a confirmed positive case

- Employers should trace close contacts of the infected worker within the workplace, for 3-7 days prior to onset of symptoms (based on where employee was and whether PPE was worn). See details on how to qualify "contact" on following page

- Communicate procedures with employees

Mark off and clean spaces identified in workplace tracing

- Employer should clean appropriate areas based on tracing procedures and CDC recommendations whenever a person has been sent home for symptoms

- Employer should perform a site area deep cleaning/disinfection (e.g., misting) as well as physical disinfection of common tools and surfaces whenever a COVID-19 person has been confirmed at the site

- If feasible, employer should consider leveraging a third-party cleaning service

7 ## Case monitoring

Define protocol for symptomatic employees

IF YOU ARE AN **EMPLOYER OF WORKERS**
EXPOSED TO COVID-19

DO

- Take employee's temperature and assess symptoms prior to their starting work.
- If an employee becomes sick during the day, send them home immediately.
- Test the use of face masks to ensure they do not interfere with workflow.
- Increase air exchange in the building.
- Increase the frequency of cleaning commonly touched surfaces.

https://www.cdc.gov/coronavirus/2019-ncov/downloads/Essential-Critical-Workers_Dos-and-Donts.pdf

Provide symptom checking and guidance to exposed employees

MONITORING

Keeping Employees Safe: What to do if an employee shows flu-like symptoms

- It is highly recommended that any employees who are showing flu-like symptoms should be excluded from the operation until they are symptom free.

Keeping Customer Safe: What to do if a customer shows flu like symptoms in the restaurant

According to the CDC, the spread of COVID-19 occurs when people are in close contact (less than 6 feet) with an infected person. Some basic steps that could be taken are:

- Provide the customer with additional napkins or tissues to use when they cough or sneeze
- Make sure alcohol-based hand sanitizer is available for customers to use
- Be sure to clean and sanitize any objects or surfaces that may have been touched

Bodily Fluid Event: What to do if there is a bodily fluid event

If a customer or employee vomits or has diarrhea it is recommended (AT THIS TIME) that the operations follows protocols that are in place for Norovirus be used

- Ensure the employee who is cleaning up the area is using Personal Protective Equipment (PPE)
- Segregate the area that has been contaminated
- Dispose of any food that has been exposed
- Ensure any utensils that might have been exposed are cleaned and sanitized
- Frequently clean and sanitize the area to include the floor, walls and any other objects contaminated by the incident
- Properly dispose any of the equipment that was used to clean up the area

For additional recommendations and resources, please visit www.cdc.gov/coronavirus

ServSafe

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(8) Facility closure

Enforce appropriate shutdown / cleaning protocols

- Employers should close restaurant immediately if an employee shows multiple symptoms of COVID-19 (fever, atypical shortness of breath, atypical cough) and perform a deep clean, consistent with guidance from FDA and the Center for Disease Control. Such a cleaning may occur overnight