Summary of Operating Conditions for Curbside Retail and Related Manufacturing and Warehouse

May 14, 2020

Overview: This summary provides local businesses and the community with information regarding expected changes to the Stay-Safe-At-Home Order (Health Officer Order C19-07c) and related guidance that will be issued on Monday, May 18, 2020, assuming conditions continue to be appropriate for these revisions. The requirements below are not final until the order is revised and related final guidance is issued, but substantial changes are not expected. Listed below are:

1) Details of the requirements for businesses that are not already permitted to operate under the Stay-Safe-At-Home Order that will qualify to provide curbside pickup and related retail supply chain services;
2) Details of the information that each curbside pickup retailer must include in its Health and Safety Plan prior to opening for curbside pickup;
3) Details of requirements for other retail supply chain services; and
4) Some questions and answers about these changes.

Part 1 - General Requirements for Additional Businesses to Operate:

The “Additional Businesses” listed below may begin operating, subject to the requirements set forth in the Order and to any additional requirements set forth below or in separate industry-specific guidance by the Health Officer. These businesses were selected to implement an initial measured expansion of commercial activity based on health-related considerations including the risks of COVID-19 transmission associated with types and modes of business operations, the ability to substantially mitigate transmission risks associated with the operations, and related factors, such as the following:

- **Increase in mobility and volume of activity**—the overall impact the reopening will have on the number of people leaving their homes and traveling to work at or access the business;
- **Contact intensity**—the type (close or distant) and duration (brief or prolonged) of the contact involved in the business;
- **Number of contacts**—the approximate number of people that will be in the setting at the same time;
- **Modification potential**—the degree to which mitigation measures can decrease the risk of transmission.

To mitigate the risk of transmission to the greatest extent possible, before resuming operations, each Additional Businesses must:
a. Prepare, post, implement, and distribute to their Personnel a Social Distancing Protocol as specified in the Order for each of their facilities in the County frequented by personnel or members of the public; and
b. Prepare, post, implement, and distribute to their Personnel a written health and safety plan that addresses all applicable best practices set forth in relevant Health Officer directives.

As relates to these general requirements, “Personnel” means the following people who provide goods or services associated with the Additional Business in the County: employees; contractors and sub-contractors (such as those who sell goods or perform services onsite or who deliver goods for the business); independent contractors (such as “gig workers” who perform work via the Additional Business’s app or other online interface); vendors who are permitted to sell goods onsite; volunteers; and other individuals who regularly provide services onsite at the request of the Additional Business.

Also, each Additional Business must comply with Social Distancing Requirements as well as all relevant state guidance and local directives. Where a conflict exists between the state guidance and local public health directives related to the COVID-19 pandemic, the most restrictive provision controls.

**List of Additional Businesses**

For purposes of the Order, Additional Businesses include the following based on the summarized health risk related rationale:

(1) **Retail Stores and Retail Supply Chain Businesses**

a. **Basis for Addition.** Curbside pickup of goods at retail stores has low contact intensity and a moderate number of contacts where interaction between the businesses’ Personnel (as defined below) and customers occur in the outdoors. Businesses that involve outdoor interactions carry a lower risk of transmission than most indoor businesses. Also, curbside pickup at these stores should result in only a relatively modest increase in the number of people reentering the workforce and the overall volume of commercial activity and mitigation measures can meaningfully decrease the resulting public health risk.

b. **Description and Conditions to Operate.** The following businesses will be permitted to operate, beginning at 10:00a.m. on May 18, 2020, subject to the stated limitations and conditions:

   i. Retail stores may operate subject to the following limitations:

      1. Retail stores may operate for curbside/outside pickup of goods, customers may not enter the store;
      2. No more than 10 Personnel may be on site in the retail facility at any time;
      3. The stores must have direct access to immediately adjacent sidewalk, street, alley, or parking area for pickup by customers using any mode of travel, without blocking pedestrian access or causing pedestrian or vehicle congestion; and
4. Retail stores in an enclosed indoor shopping center that do not have direct access to adjacent sidewalk, street, parking lot, or alley area may not reopen at this time.

   ii. Businesses that manufacture the goods sold at retail stores covered in category (i) above and have no more than 50 Personnel on site in the facility at any time.

   iii. Businesses that provide warehousing and logistical support to the retail stores covered in category (i) above and have no more than 50 Personnel on site in the facility at any time.

For clarity, the limits on the total number of Personnel in categories (i), (ii) and (iii) are subject to Personnel maintaining at least six feet of physical distance at all times; that is, if a facility does not have enough space to provide at least six feet of physical distance between the maximum number of Personnel then it may only have the number of people on site that does allow for such physical distancing. Also, those maximum limits on Personnel in categories (i), (ii) and (iii) do not apply to any facility that has been operating as an Essential Business. Operation of retail stores for curbside pickup under category (i) applies only to the sale of goods and not the provision of services. The exchange of goods between the store’s Personnel and its customers must take place in the outdoors, though the exchange may be through a door or open window.

**Part 2 – Health and Safety Plan Requirements for Retail Businesses with Curbside Pickup:**

In addition to preparing, posting, and implementing the Social Distancing Protocol required by the Stay-Safe-At-Home Order, each owner, operator, manager, or supervisor of a Retail Business with Curbside Pickup that operates in the City must create, adopt, and implement a Health and Safety Plan that addresses each item below.

**Requirements:**

1. **Section 1 – Signage and Education:**
   
   1.1. Post signage at each public entrance of the facility or location (if any) to inform all Personnel and customers that they must: avoid entering the facility or location if they have a cough or fever, maintain a minimum six-foot distance from one another while in the facility or location, wear a face covering or barrier mask (a “Face Covering”) at all times, and not shake hands or engage in any unnecessary physical contact. Criteria for Face Coverings and the requirements related to their use are set forth in Health Officer Order No. C19-12, issued on April 17, 2020 (the “Face Covering Order”). Sample signs are available online at [https://sf.gov/outreach-toolkit-coronavirus-covid-19](https://sf.gov/outreach-toolkit-coronavirus-covid-19).

   1.2. Post a copy of the Social Distancing Protocol at each public entrance to the facility or location. A fillable form version of the protocol is available online at [https://www.sfdph.org/dph/alerts/coronavirus-healthorders.asp](https://www.sfdph.org/dph/alerts/coronavirus-healthorders.asp) (search for “Social Distancing Protocol”).
1.3. Post a copy of the Health and Safety Plan at each public entrance to the facility or location. A fillable form version of the requirements for the Health and Safety Plan will soon be available online at [https://www.sfdph.org/dph/alerts/coronavirus-healthorders.asp](https://www.sfdph.org/dph/alerts/coronavirus-healthorders.asp).

1.4. Distribute to all Personnel copies of the Social Distancing Protocol and the Health and Safety Plan (or a summary of each item with information on how copies may be obtained) and any educational materials required by the Health and Safety Plan.

1.5. Educate all Personnel of the requirements of the Social Distancing Protocol and the Health and Safety Plan that apply to them.

1.6. Update the Health and Safety Plan as appropriate while the Directive is in effect.

2. **Section 2 – Personnel and Customer Protection and Sanitation Requirements:**

2.1. Instruct all Personnel orally and in writing not to come to work or the facility if they are sick.

2.2. Provide a copy of the attachment to these requirements, titled “Information for Personnel (Employees, Contractors, Volunteers) of Additional Business and Other Businesses Permitted To Operate During the Health Emergency” (the “Attachment”), to all Personnel in hardcopy format or electronically. PDF and translated versions of the Attachment can be found online at [www.sfcdcp.org/covid19](http://www.sfcdcp.org/covid19) (open the “Businesses and Employers” area of the “Information and Guidance for the Public” section). If the Attachment is updated, provide an updated copy to all Personnel.

2.3. Review the criteria listed in Part 1 of the Attachment on a daily basis with all Personnel in the City before each person enters work spaces or begins a shift. If such a review is not feasible because the Retail Business with Curbside Pickup does not directly interact with some Personnel onsite daily, then that Retail Business with Curbside Pickup must for those Personnel (1) instruct such Personnel to review the criteria before each shift in the City and (2) have such Personnel report to the Retail Business with Curbside Pickup that they are okay to begin the shift such as through an app, website, email, text message, or phone call.

   Instruct any Personnel who answered yes to any question in Part 1 of the Attachment to return home or not come to work and follow the directions on the Attachment.

2.4. Instruct Personnel who stayed home or who went home based on the criteria listed on the Attachment that they must follow the criteria as well as any applicable requirements from the quarantine and isolation directives (available online at [www.sfdph.org/dph/alerts/coronavirus-healthorders.asp – Directive Numbers 2020-02 and 2020-03](https://www.sfdph.org/dph/alerts/coronavirus-healthorders.asp)) before returning to work. If they are required to self-quarantine or self-isolate, they may only return to work after they have completed self-quarantine or self-isolation. If they test negative for the virus (no virus found), they may only return to work after waiting for the amount of time listed on the Attachment after their symptoms have resolved. Personnel are not required to provide a medical clearance letter in order to return to work as long as they have met the requirements outlined on the Attachment.

2.5. In the coming weeks the Department of Public Health is likely to issue guidelines requiring Retail Businesses with Curbside Pickup and other permitted businesses to comply with COVID-19 testing requirements for employers and businesses. Businesses should be given advance notice before testing requirements go into effect. At least weekly, check the following website for any testing requirements for employers and businesses:
www.sfcdcp.org/covid19. If requirements are added, ensure that the Health and Safety Plan is updated and that the Retail Business with Curbside Pickup and all Personnel comply with testing requirements.

2.6. If an aspect of the Retail Business with Curbside Pickup is allowed to operate and is covered by another directive (such as for delivery of goods, which is covered by Directive No. 2020-06), then the Retail Business with Curbside Pickup must comply with all applicable directives, and its Health and Safety Plan must include all applicable components from those directives. Copies of other directives are available online at https://www.sfdph.org/dph/alerts/coronavirus-healthorders.asp.

2.7. Instruct all Personnel and customers to maintain at least six-feet distance from others, including when shopping on behalf of customers, except when momentarily necessary to facilitate or accept payment and hand off items or deliver goods. Note that if the Retail Business with Curbside Pickup cannot ensure maintenance of a six-foot distance within the facility between Personnel, such as by moving work stations or spreading Personnel out, it must reduce the number of Personnel permitted in the facility accordingly. The maximum number of Personnel permitted by Appendix C-1 to the Stay-Safe-At-Home Order may be too high for such an entity to safely operate.

2.8. Provide Face Coverings for all Personnel, with instructions that they must wear Face Coverings at all times when at work, as further set forth in the Face Covering Order. A sample sign is available online at https://sf.gov/outreach-toolkit-coronavirus-covid-19. Allow Personnel to bring their own Face Covering if they bring one that has been cleaned prior to the shift. In general, people should have multiple Face Coverings (whether reusable or disposable) to ensure they use a clean one each day. The Face Covering Order permits certain exceptions, and the Retail Business with Curbside Pickup should be aware of those exceptions (for example, children 12 years old or younger or based on a written medical excuse). When Personnel do not wear a Face Covering because of an exception, take steps to otherwise increase safety for all.

2.9. If customers wait in line outside any facility or location operated by the Retail Business with Curbside Pickup, require customers to wear a Face Covering while waiting in line outside the facility or location. This includes taking steps to notify customers they will not be served if they are in line without a Face Covering and refusing to serve a customer without a Face Covering, as further provided in the Face Covering Order. The Retail Business with Curbside Pickup may provide a clean Face Covering to customers while in line. For clarity, the curbside transaction must be aborted if the customer is not wearing a Face Covering. But the Retail Business with Curbside Pickup must permit a customer to obtain service who is excused by the Face Covering Order from wearing a Face Covering, including by taking steps that can otherwise increase safety for all.

2.10. Create and implement an education plan for all Personnel covering all items required in the Social Distancing Protocol and the Health and Safety Plan.

2.11. Provide a sink with soap, water, and paper towels for handwashing, for all Personnel working onsite at the facility or location. Require that all Personnel wash hands at least at the start and end of each shift, after sneezing, coughing, eating, drinking, smoking (to the extent smoking is allowed by law and the facility), or using the restroom, when changing tasks, and, when possible, frequently during each shift. Personnel that work off-site, such as driving or delivering goods, must be required to use hand sanitizer throughout their shift.

2.12. Provide hand sanitizer effective against COVID-19 at points of purchase for all customers and elsewhere at the facility or location for Personnel. Sanitizer must also be provided to
Personnel who shop, deliver, or drive for use when they are shopping, delivering, or driving. If sanitizer cannot be obtained, a handwashing station with soap, water, and paper towels will suffice for Personnel who are on-site at the Retail Business with Curbside Pickup’s location. But for Personnel who shop, deliver, or drive in relation to their work, the Retail Business with Curbside Pickup must provide hand sanitizer effective against COVID-19 at all times; for any period during which the Retail Business with Curbside Pickup does not provide sanitizer to such shopping, delivery, or driving Personnel, the Retail Business with Curbside Pickup is not allowed for that aspect of its service to operate in the City. Information on hand sanitizer, including sanitizer effective against COVID-19 and how to obtain sanitizer, is available online from the Food and Drug Administration here: https://www.fda.gov/drugs/information-drug-class/qa-consumers-hand-sanitizers-and-covid-19.

2.13. Provide disinfectant and related supplies to Personnel and require Personnel to sanitize all high-touch surfaces under their control, including but not limited to: shopping carts and baskets used by Personnel; countertops, food/item display cases, refrigerator and freezer case doors, drawers with tools or hardware, and check-out areas; cash registers, payment equipment, and self-check-out kiosks; door handles; tools and equipment used by Personnel during a shift; and any inventory-tracking or delivery-tracking equipment or devices which require handling throughout a work shift. These items should be routinely disinfected during the course of the day, including as required below. A list of products listed by the United States Environmental Protection Agency as meeting criteria for use against the virus that causes COVID-19 can be found online here: https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2.

2.14. Ensure that all shared devices or equipment are cleaned and/or sanitized by Personnel on frequent schedules, not less than at the beginning and end of each Personnel member’s work shift and during the shift.

2.15. Direct all Personnel to avoid touching unsanitized surfaces that may be frequently touched, such as door handles or credit cards, unless protective equipment such as gloves (provided by the Retail Business with Curbside Pickup) are used and discarded after each use or hand sanitizer is used after each interaction.

2.16. Frequently disinfect any break rooms, bathrooms, and other common areas. Create and use a daily checklist to document each time disinfection of these rooms or areas occurs.

2.17. For any facility or location operated by the Retail Business with Curbside Pickup that has shopping carts or baskets for use by Personnel, assign Personnel to disinfect shopping carts and baskets after each use and take steps to prevent anyone from grabbing used carts and baskets before disinfection.

2.18. For any facility or location operated by the Retail Business with Curbside Pickup that has shopping carts or baskets for use by Personnel, provide disinfecting wipes that are effective against COVID-19 near shopping carts and shopping baskets. A list of products listed by the United States Environmental Protection Agency as meeting criteria for use against the virus that causes COVID-19 can be found online here: https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2.

2.19. Establish adequate time in the work day to allow for proper cleaning and decontamination throughout the facility or location by Personnel including, but not limited to, before closing for the day and opening in the morning.
2.20. Suspend use of any microwaves, water coolers, drinking fountains, and other similar group equipment for breaks until further notice.

2.21. When possible, provide a barrier between the customer and the cashier such as a plexi-glass temporary barrier. When not possible, create sufficient space to enable the customer to stand more than six feet away from the cashier while items are being scanned/tallied and bagged.

2.22. Provide for contactless payment systems or, if not feasible, sanitize payment systems, including touch screens, payment portals, pens, and styluses, after each customer use. Customers may pay with cash but to further limit person-to-person contact, Personnel should encourage customers to use credit, debit, or gift cards for payment.

2.23. For any larger facility or location, appoint a designated sanitation worker at all times to continuously clean and sanitize commonly touched surfaces and meet the environmental cleaning guidelines set by the Center for Disease Control and Prevention.

2.24. If an employee or other Personnel tests positive for COVID-19, follow the guidance on “Business guidance if a staff member tests positive for COVID-19,” available online at sf.gov/business-guidance-if-staff-member-tests-positive-covid-19.

2.25. Post signs to advise customers of the maximum line capacity in order to ensure that the maximum number of customers in line is not exceeded. Once the maximum number of customers is reached, customers should be advised to return later to prevent buildup of congestion in the line.

2.26. Place tape or other markings on the sidewalk at least six feet apart in customer line areas outside the facility with signs directing customers to use the markings to maintain distance.

2.27. When stocking shelves, if any, ensure that Personnel wash or sanitize hands before placing items on shelves, making sure to again wash or sanitize hands if they become contaminated by touching face or hair or being exposed to other soiled surfaces.

2.28. Ensure that all Personnel who shop or select items on behalf of customers wear a Face Covering when shopping, packing, and/or delivering items.

2.29. Require Personnel to wash hands frequently, including:

- When entering any kitchen or food preparation area
- Before starting food preparation or handling
- After touching their face, hair, or other areas of the body
- After using the restroom
- After coughing, sneezing, using a tissue, smoking, eating, or drinking
- Before putting on gloves
- After engaging in other activities that may contaminate the hands

2.30. Assign Personnel to keep soap and paper towels stocked at sinks and handwashing stations at least every hour and to replenish other sanitizing products.

3. Section 3 – For Curbside Pickup:
3.1. Prohibit customers from entering the Business with Curbside Pickup. The transaction must occur outside the building, such as in the doorway, through an exterior window, or at a small table set up at the front of the facility.

3.2. Instruct all Personnel involved in curbside pickup to wash their hands frequently and to use hand sanitizer (provided by the Retail Business with Curbside Pickup) before and after handing items to a customer.

3.3. If possible, provide a specified delivery location and contact method to allow for delivery without direct interaction, except as necessary to accept payment. When possible, provide options to accept payment through contactless technologies, in advance via phone, an app, or the internet, or verbally (such as reading a credit card number and required information).

3.4. Remind Personnel to wear a Face Covering at all times, including when interacting with customers who are picking up items.

3.5. When necessary for the curbside pickup processes, modify or eliminate (if possible) customer signature-capture procedures so Personnel may maintain a safe, appropriate distance and/or avoid sharing of signing equipment such as pen or stylus and avoid shared handling of devices or equipment. If not feasible, sanitize such equipment or devices before and after each use in order to protect each customer.

3.6. For those businesses in relation to which there is a nearby parking lot, the curbside transaction may occur without the customer exiting their motor vehicle if they are parked in the parking lot. In such situations, the vehicle should be parked with the motor turned off. The customer should provide the vehicle’s make, model, color, and license plate number during the initial, offsite/remote sales transaction so as to clearly identify the vehicle for Personnel. For this kind of pick-up, the customer should contact the Retail Business with Curbside Pickup when they are parked. Personnel may then load the purchased item into the vehicle’s trunk compartment when feasible. If the handoff of the ordered items requires an interaction between the customer and Personnel, such as handing off the item into the vehicle’s backseat or through a window, the Customer and delivery person must each be wearing a Face Covering during the interaction. The Customer should be advised, such as through a hand-held sign, to put on the Face Covering before the delivery person approaches the vehicle. A Face Covering may not need to be worn otherwise while waiting in the car. A similar procedure may be used for other modes of transportation, such as bicycles or motorcycles.

3.7. Limit the number of customers waiting in line for curbside pickup at any one time to a number that allows for customers and Personnel to easily maintain at least six foot distance from one another and allows sufficient sidewalk space to allow safe pedestrian right-of-way at all times. One possible way to ensure this is to offer time windows during which customers may schedule time to pick up items in order to disperse customer traffic throughout the day.

3.8. The Retail Business with Curbside Pickup should consider the local street, sidewalk, and building context and the risks associated with customer, traffic, pedestrian, and bicyclist safety based on its new or expanded curbside pickup. It should ensure that it does not: encourage customer and Personnel exposure to traffic and bike lanes, block visibility of other travelers (whether vehicle, pedestrian, or bicyclist), block ADA-compliant public access to sidewalks, and encourage overlap of lines outside the facility with lines from other neighboring stores or businesses. For example, the business should not deliver items to double-parked cars or in bike lanes and should limit the number of customers who may stand in line in order not to overlap with the line of a neighboring retail business.
Part 3 – Health and Safety Plan Requirements for Other Retail Supply Chain Services:

In addition to preparing, posting, and implementing the Social Distancing Protocol required by the Stay-Safe-At-Home Order, each owner, operator, manager, or supervisor of another retail supply chain service (such as logistics and warehousing facilities and manufacturing facilities) that operates in the City must create, adopt, and implement a Health and Safety Plan that addresses each item listed below.

To start, address Items 1.1 through 1.6 and 2.1 through 2.30 listed above except to the extent that any item relates to customers. In addition, the business should also address the issues listed in applicable guidance provided by the State of California for the following types of retail businesses in its Health and Safety Plan:


For more information from the State of California on these topics, you may go here: [https://covid19.ca.gov/industry-guidance/](https://covid19.ca.gov/industry-guidance/).

Part 4 – Some Questions and Answers About These Changes:

**My retail store is located in an enclosed shopping center (e.g., Stonestown Galleria or the Ferry Building). Can I open for curbside pickup?**

If your store has an entrance that opens directly to an adjacent sidewalk, street or alley, it may open for curbside pickup. If your store does not have an entrance that opens directly to the outside—i.e., if the only way to enter the store is by going through an indoor space—it may not open for curbside pickup at this time.

**My retail store is small—can I still have 10 personnel on site to handle curbside pickup?**

No. If your retail business cannot safely maintain a six-foot distance between personnel, you must reduce the number of personnel accordingly. Ten people may be too many for a particular entity to safely operate.

**My retail store is large enough to accommodate more than ten employees at a time while maintaining adequate social distancing. Can I have more than ten people on site to handle curbside pickup?**

No. You may not have more than people on site to handle curbside pickup at this time.
I already had 15 people working in my retail store to facilitate deliveries. Can I have more people come into the facility to handle curbside pickup?

Yes, if you were operating for delivery before May 18, those personnel don’t count against the 10 person limit. You may have up to ten more people come into the facility for purposes of facilitating curbside pickup, assuming the facility is large enough to maintain adequate social distancing.

I already had 100 people in my warehouse handling food or sanitation products. Can I have more people come into the facility to handle goods that can now be sold curbside at retail stores?

Yes, if you were operating before May 18, those personnel don’t count against the 50 person limit, which applies to additional workers being added to the site.

I run a shoe repair shop that also sells goods (e.g., shoe polish and shoe laces). Can customers hand me shoes to repair curbside? Can I sell my goods curbside?

Operation of retail stores for curbside pickup applies only to the sale of goods and not the provision of services. So you may sell goods at the door, but cannot exchange shoes to be repaired at this time.

There’s a metered parking space immediately outside the entrance to my store. How can I provide for use of that space for curbside pickup?

You can request that the adjacent street parking be converted to temporary loading zone to help encourage physical distancing and reduce crowding. To do so, you can submit an online application to the MTA here.