



# Arizona Restaurant Association

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## Restaurant Guidance on Reopening Dining Room Operations

### **“Welcome Back to the Table”**

The Arizona restaurant industry has an outstanding safety track record and continues to meet the high standards under the FDA Food Code. The COVID-19 crisis has stressed not just our businesses and employees, but also the future of the industry. As we continue to welcome our guests back into our dining rooms, it is important to understand the new actions we can take as an industry to protect our staff, customers, and communities.

### **Introduction**

Welcome Back to the Table outlines the legal requirements for restaurants and lays out a set of guiding principles and operating protocols designed by industry to enable Arizona restaurants to operate their dining rooms in a safe and responsible manner. The Arizona Restaurant Association worked with industry leaders, public health experts, restaurant operators of all sizes, and our supplier partners to develop these guidelines to ensure customers that the restaurant industry is taking a leadership role in protecting our community.

### **Summary of Changes**

- [Added clarification on EO 2020-40.](#)
- [Specifies that all CDC, OSHA, and AZDHS guidance must be incorporated into restaurant written policies.](#)
- [Links to ARA Masks Wearing Ordinance Guide.](#)
- [Inclusion of EO 2020-47 requirements](#)
- Breakdown of [CDC](#) and [OSHA](#) Guidelines to be incorporated in policies
- [Updated Arizona specific restaurant requirements](#)
- Updated [ARA recommendations](#) to comply with recent orders
- Updated ARA recommendations to include [Outdoor Seating and Air Circulation](#) section
- [Updated resource page](#)
- Incorporated the [ARA Employee Positive COVID-19 Guidance](#)

## **Requirements for Restaurants pursuant to Executive Orders 2020-36, 2020-40, and 2020-47**

**NOTE:** *the provisions of the Governor's requirements are not repeated verbatim and have been adapted by the ARA to correct for intent.*

### **Pursuant to [EO 2020-40](#):**

EO 2020-40 contains several sections relevant to restaurants. Paragraph 3 states:

*“Businesses shall assist in efforts to ‘Contain the Spread’ by updating written policies in accordance with Executive Order 2020-36, Stay Health Return Smarter, Return Stronger, that adopt guidance from the CDC, Department of Labor, Occupational Safety and Health Administration (OSHA) and ADHS to limit and mitigate the spread of COVID-19. This provision shall be enforced by law enforcement and regulatory agencies that have jurisdiction in paragraph 5.”*

The above provision requires restaurants to update existing policies or issue new ones to incorporate relevant guidance from the CDC, OSHA, and AZDHS. It is important to remember that this guidance has been changing throughout the pandemic and that restaurants will need to adapt their policies as the guidance changes. The guidance in this document is current as of the date listed above. The reference to [EO 2020-36](#) is specific to Paragraph 5 which requires policies to be adopted by businesses that incorporate guidance from the CDC, OSHA, and AZDHS, and specifically addresses the following areas:

- Promoting healthy hygiene practices.
- Intensifying cleaning, disinfection, and ventilation practices.
- Monitoring for sickness.
- Ensuring physical distancing.
- Providing necessary protective equipment.
- Allowing for and encouraging teleworking where feasible.
- Providing plans, where possible, to return to work in phases.
- Limiting congregation of groups of no more than 10 persons when feasible and in relation to the size of the location.

Paragraph 4 of EO 2020-40 gives cities and counties the ability to adopt and enforce mask wearing ordinances. This provision has less significance for restaurants as a result of [EO 2020-47](#), but is still important. Many cities and counties have adopted their own ordinances related to mask wearing and the ARA has created a [guidance document](#) for restaurants to utilize.

**Pursuant to [EO 2020-47](#):**

EO 2020-47 limits indoor restaurant patron count to “less than 50 percent of the permitted fire code occupant load.” Importantly, restaurant employees do not count against this restriction, so the occupancy limit is only applied to patrons. Regardless of the number of people allowed within an establishment, the restaurant must still be able to separate parties of people by at least 6-feet in all directions. EO 2020-47 also requires restaurants to eliminate indoor standing room. As you will read below, the ARA recommends accomplishing this by eliminating self-seating and ensuring that each patron is seated by a member of the staff. All buffets, cafeteria style and self-serve food bars must be closed.

- Indoor occupancy is limited to less than 50 percent of the fire code occupant load – Restaurant staff are not counted against the occupancy limit
- Eliminate indoor standing room
- Close all buffets, cafeteria style and self-serve food bars (restaurants should also reevaluate their use of drink fill stations)

**Current CDC Recommendations for Restaurants & Bars**

The CDC had a [dedicated page](#) for restaurant and bar operations. In this page, the CDC identifies different levels of risk for restaurant operations, which include<sup>1</sup>:

- Lowest Risk: Food service is limited to drive-through, delivery take-out, or curbside pickup.
- More Risk: Drive-through, delivery, take-out, and curbside pickup are emphasized and encouraged, and on-site dining is limited to outdoor seating with 6-feet of separation.
- Even More Risk: On-site dining with both indoor and outdoor seating. Seating capacity is reduced to allow tables to be spaced at least 6-feet apart.

Per EO 2020-40, the CDC recommendations must be incorporated into your policies. As of the date on this document, CDC recommendations included but are not limited to:

**Promoting Behaviors that Reduce Spread**

- Educate employees about when they should stay home and [quarantine](#), and when they can return to work:
  - Actively encourage employees who are sick or have recently had a close contact with a person with COVID-19 to stay home.

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<sup>1</sup> NOTE: the risk factors are not listed verbatim and are instead adapted by the ARA to apply more narrowly to Arizona. Specifically, a fourth category of “Highest Risk” is excluded because the activity is prohibited by AZ Law.

- Develop policies that encourage sick employees to stay home without fear of reprisal, and ensure employees are aware of these policies.
- [Employees should stay home](#) if they have tested positive for, or are showing [symptoms of COVID-19](#).
- Employees who have recently had a close contact with a person with COVID-19 should also [stay home and monitor their health](#).
  - The CDC recommendations for quarantining after a close contact is to stay home for 14 days after your last close contact with a person who has COVID-19 and to monitor for symptoms.
  - Close contact means: an individual who has had contact with someone with COVID-19 within 6-feet for 15 minutes or longer.

NOTE: The CDC also has a separate set of guidance for employees that have had close contact but work in an essential industry (which includes restaurants). We discuss this later in the document.

- If an employee has had COVID-19, and experienced symptoms, they can return to work after:
  - At least 10 days since symptoms first appeared, symptoms have improved, and they have been without a fever for at least 24 hours without the use of fever-reducing medication, OR
  - All symptoms have gone away, including a fever, and they received two negative test results in a row, at least 24 hours apart.
- If an employee tested positive for COVID-19 but does not have symptoms, they may return to work after:
  - 10 days have past since the positive test, OR
  - They have received two negative test results in a row, at least 24 hours apart.
- Hand Hygiene and Respiratory Etiquette.
  - Require frequent employee [handwashing](#) with soap and water for at least 20 seconds and increase monitoring to ensure adherence.
  - Encourage employees to cover coughs and sneezes with a tissue. Used tissues should be thrown in the trash and hands washed immediately with soap and water for at least 20 seconds.
- Cloth Face Coverings.
  - Require the proper use of [cloth face coverings](#) among all staff. Face coverings are most essential in times when physical distancing is difficult.
  - Provide staff with information on [proper use, removal, and washing of cloth face coverings](#), including:
    - Wash your hands before putting on your face covering

- Put it over your nose and mouth and secure it under your chin
- Fit it snugly against the sides of your face
- Ensure you can breathe easily
- Do not put the face covering around your neck or up on your forehead
- Do not touch the face covering, and, if you do, wash your hands with soap and water for at least 20 seconds or use hand sanitizer
- When removing a face covering:
  - Untie the strings behind your head or stretch the ear loops
  - Handle only by the ear loops or ties
  - Fold outside corners together
  - Place coverings in the washing machine (or designated area by your employer if cleaned by the restaurant)
  - Do not touch your eyes, nose, and mouth when removing and wash your hands with soap and water for at least 20 seconds after removing.
- How to clean a cloth face covering.
  - If using a washing machine, include the face covering with your regular laundry, use regular laundry detergent and the warmest appropriate water setting for the cloth used to make the face covering.
  - If washing by hand:
    - Prepare a bleach solution by mixing 5 tablespoons (1/3 cup) of household bleach per gallon of room temperature water.
    - Ensure the bleach is intended for disinfection (check the label) and not past its expiration date.
    - Soak the face covering in the bleach solution for 5 minutes.
    - Rinse thoroughly with cool or room temperature water.
  - If using a dryer to dry the face covering, use the highest heat setting and leave in the dryer until completely dry.
  - If air drying, lay the face covering flat and allow to completely dry. If possible, place the face covering in direct sunlight.

Note on Face Shields: It is not known if face shields provide any benefit as source control to protect others from the spray of respiratory particles. CDC does not recommend use of face shields for normal everyday activities or as a substitute for cloth face coverings. Face shields in the restaurant space should only be used in addition to a cloth face covering. Disposable face shields should only be worn for a single use. Reusable face shields should be cleaned and disinfected after each use.

- Adequate supplies: ensure adequate supplies to support healthy hygiene behaviors, including soap, hand sanitizer containing at least 60% alcohol (placed on every table, if

supplies allow), paper towels, tissues, disinfectant wipes, cloth face coverings, and no-touch/foot pedal trash cans.

- Signs and messages.
  - Post signs in highly visible locations (e.g., at entrances, in restrooms) that:
    - [Promote everyday protective measures](#);
    - [Describe how to stop the spread](#);
    - [Describe proper hand washing](#); and
    - [Describe how to properly wear a cloth face covering](#).

### Maintaining Healthy Environments

The following is a summary of the CDC guidance for reference in restaurant policies. However, the ARA recommends that restaurants utilize the [ECOLAB COVID-19 Cleaning and Disinfecting Guidance](#).

- Cleaning and Disinfection.
  - [Clean and disinfect](#) frequently touched surfaces (e.g., door handles, cash registers, workstations, sink handles, bathroom stalls) at least daily, or as much as possible and as required by food safety requirements. Clean shared objects (e.g., payment terminals, tables, countertops/bars, receipt trays, condiment holders) between each use.
  - Continue to follow all required safety laws, regulations, and rules.
  - Use products that meet [EPA disinfection criteria](#) and that are appropriate for the surface. Allow the disinfectant to remain on the surface for the contact time recommended by the manufacturer.
  - Establish a disinfection routine and train staff on proper cleaning timing and procedures to ensure safe and correct application of disinfectants.
  - Wash, rinse, and sanitize food contact surfaces with an EPA-approved food contact surface sanitizer. If a food-contact surface must be disinfected for a specific reason, such as a blood or bodily fluid cleanup or deep clean in the event of likely contamination with SARS-CoV-2, use the following procedure: wash, rinse, disinfectant according to the label instructions for the disinfectant, rinse, then sanitize with a food-contact surface sanitizer.
  - Ensure that cleaning or disinfecting product residues are not left on table surfaces. Residues could cause allergic reactions or cause someone to ingest the chemicals.
  - Develop a schedule for increased, routine cleaning and disinfection.
  - Ensure safe and correct use and storage of disinfectants to avoid food contamination and harm to employees and other individuals. This includes storing products securely away from children.
  - Use gloves when removing garbage bags or handling and disposing of trash. Wash

hands after removing gloves.

- Shared Objects
  - Discourage sharing of items that are difficult to clean, sanitize, or disinfect.
  - Limit any sharing of food, tools, equipment, or supplies by staff members.
  - Ensure adequate supplies to minimize sharing of high-touch materials (e.g., serving spoons) to the extent possible; otherwise, limit use of supplies and equipment by one group of workers at a time and clean and disinfect between use.
  - Avoid using or sharing items that are reusable, such as menus, condiments, and any other food containers. Instead, use disposable or digital menus, single serving condiments, and no-touch trash cans and doors.
  - Use touchless payment options as much as possible, if available. Ask customers and employees to exchange cash or card payments by placing on a receipt tray or on the counter rather than by hand to avoid direct hand to hand contact. Clean and disinfect frequently touched surfaces such as pens, counters, or hard surfaces between use and encourage patrons to use their own pens.
  - Use disposable food service items (e.g., utensils, dishes, napkins, tablecloths). If disposable items are not feasible or desirable, ensure that all non-disposable food service items are handled with gloves and washed with dish soap and hot water, or in a dishwasher. Change and launder linen items (e.g., napkins and tablecloths) after each customer or party's use. Employees should wash their hands after removing their gloves or after handling used food service items.
  - Avoid use of food and beverage utensils and containers brought in by customers.
- Ventilation: Ensure that ventilation systems operate properly and increase circulation of outdoor air as much as possible, for example by opening windows and doors and prioritizing outdoor seating. Do not open windows and doors if doing so poses a safety or health risk to customers or employees (e.g., risk of falling or triggering asthma symptoms).
- Water Systems: 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., sink faucets, decorative fountains, drinking fountains) are safe to use after a prolonged facility shutdown.
- Modified Layouts and Procedures.
  - Change restaurant and bar layouts to ensure that all customer parties remain at least 6 feet apart (e.g., marking tables/stools that are not for use).
  - Limit seating capacity to allow for social distancing.
  - Offer drive-through, curbside take out, or delivery options as applicable. Prioritize outdoor seating as much as possible.
  - Ask customers to wait in their cars or away from the establishment while waiting to pick up food or when waiting to be seated. Inform customers of food pickup and dining protocols on the business' website and on posted signs.

- Discourage crowded waiting areas by using phone app, text technology, or signs to alert patrons when their table is ready. Avoid using “buzzers” or other shared objects.
- Consider options for dine-in customers to order ahead of time to limit the amount of time spent in the establishment.
- Avoid offering any self-serve food or drink options, such as buffets, salad bars, and drink stations.<sup>2</sup>
- Physical Barriers and Guides.
  - Install physical barriers, such as sneeze guards and partitions, particularly in areas where it is difficult for individuals to remain at least 6 feet apart. Barriers can be useful in restaurant kitchens and at cash registers, host stands, or food pickup areas where maintaining physical distance of at least 6 feet is difficult.
  - Provide physical guides, such as tape on floors or sidewalks and signage, to ensure that individuals remain at least 6 feet apart. Consider providing these guides where lines form, in the kitchen, and at the bar.
  - Close shared spaces such as break rooms, if possible; otherwise stagger use and clean and disinfect between use.

### Maintaining Healthy Operations

- Protections for Employees at Higher Risk for Severe Illness from COVID-19
  - Offer options for employees at [higher risk for severe illness](#) (including older adults and people of all ages with certain underlying medical conditions) that limits their exposure risk.
  - Consistent with applicable law, develop policies to protect the privacy of persons at higher risk.
- Staggered or Rotated Shifts and Sittings.
  - Rotate or stagger shifts to limit the number of employees in the restaurant or bar at the same time.
  - Stagger and limit dining times to minimize the number of customers in the establishment.
  - When possible, use flexible work hours (e.g., staggered shifts) to help establish policies and practices for social distancing (maintaining distance of approximately 6 feet) between employees and others.
- Travel and Transit.
  - For employees who commute to work using public transportation or ride sharing, encourage them to use transportation options that minimize close contact with others (e.g., walking or biking, driving or riding by car – alone or with household members only) or consider offering the following support:

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<sup>2</sup> Note: Self-serve food options are prohibited under EO 2020-47.

- Ask employees to follow the [CDC guidance on how to Protect Yourself When Using Transportation](#).
- Allow employees to shift their hours so they can commute during less busy times.
- Ask employees to wash their hands as soon as possible after their trip.
- Designate COVID-19 Point of Contact: Designate a staff person for each shift to be responsible for responding to COVID-19 concerns and ensure all staff members know who that person is.
- Communication Systems: Put in place systems for:
  - Consistent with applicable law and privacy policies, having staff self-report to the establishment's point of contact if they have symptoms of COVID-19, a positive test for COVID-19, or were exposed to someone with COVID-19 within the last 14 days in accordance with [health information sharing regulations for COVID-19](#) and other applicable privacy and confidentiality laws and regulations.
  - Notifying staff, customers, and the public of business closures, and restrictions in place to limit COVID-19 exposure (e.g., limited hours of operation).
- Leave (Time Off) Policies.
  - Implement flexible sick leave policies and practices that enable employees to stay home when they are sick, have been exposed, or [caring for someone](#) who is sick.
    - Examine and revise policies for leave, telework, and employee compensation.
    - Leave policies should be flexible and not punish people for taking time off and should allow sick employees to stay home and away from co-workers. Leave policies should also account for employees who need to stay home with their children if there are school or childcare closures, or to care for sick family members.
  - Develop policies for return-to-work after COVID-19 illness. CDC's criteria to discontinue home isolation can inform these policies. (see above)
- Back-Up Staffing Plan: Monitor absenteeism of employees, cross-train staff, and create a roster of trained back-up staff.
- Staff Training: Train all employees in safety actions and conduct training virtually, or ensure that social distancing is maintained during training.
- Recognize Signs and Symptoms: Conduct daily health checks (e.g., temperature screening and/or or symptom checking) of staff safely and respectfully, and in accordance with any applicable privacy laws and regulations.
- Support Coping and Resilience.
  - Promote employees eating healthy, exercising, getting sleep, and finding time to unwind.
  - Encourage employees to talk with people they trust about their concerns and how they are feeling.
  - Consider posting signs for the national distress hotline: 1-800-985-5990.

### **Current OSHA Recommendations for Retail Operations**

OSHA has issued two separate documents relevant to restaurant operations. The first is the [Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 \(COVID-19\)](#). Restaurants are encouraged to review this guidance but we will not be covering it here because many of the items designed to broadly apply to many industries and the other guidance we discuss here cover these areas in more detail. The second relevant piece from OSHA is the [Guidance for Retail Workers and Employers in Critical and High Customer-Volume Environments](#). Specifically, OSHA recommends:

- Engineering Controls.
  - As appropriate, such as at customer service windows and, if feasible, cash register lanes, use physical barriers to separate retail workers from members of the general public.
  - Use rope-and-stanchion systems to keep customers from queueing or congregating near work areas. For example, provide a waiting area for customers that is separated by at least 6 feet from a cash register workstation. Signage that instructs individuals waiting in line to remain 6 feet back from work areas may bolster the effectiveness of this engineering control.
- Administrative Controls.
  - Whenever possible, direct customers to self-checkout kiosks to minimize worker interaction with customers.
  - Establish protocols and provide supplies to disinfect frequently touched surfaces in workspaces and public-facing areas, such as points of sale. For example, wipe down credit card terminals and pens/styluses between each customer. Providing wipes for customers and asking them to do this themselves after each use may also reduce the chance of worker exposure resulting from this frequently repeated activity. Wipe down worker-facing touch screens, keyboards, or other equipment at least as often as workers change workstations. Frequently clean push bars and handles on any doors that do not open automatically.
  - Take steps to discourage customers from queueing at customer service lanes, cash register lanes, or other areas within the retail environment. Such efforts may include those mentioned in the Engineering Controls section, above, as well as signage.
  - Consider restricting the number of customers allowed inside the facility at any point in time. Some stores have implemented this by specifying hours dedicated to vulnerable populations (elderly people, people with underlying health conditions, etc.).
  - Employers may be able to reduce crowding in retail environments by extending store hours, particularly in critical retail environments like grocery stores and pharmacies, but should consider overall additional exposures to employees who

- must work extra shifts and take steps to mitigate that increased exposure risk.
- When developing staff schedules, consider options for additional short breaks to increase the frequency with which staff can wash hands with soap and water. Alternatively, consider providing alcohol-based hand sanitizers with at least 60% alcohol so that workers can frequently sanitize their hands.
- Employers should consider options for increasing in-store pickup or delivery to minimize the number of customers shopping in store facilities.
- Safe Work Practices
  - Workers should avoid touching their faces, including their eyes, noses, and mouths, particularly until after they have thoroughly washed their hands upon completing work and/or removing PPE.
  - Throughout the work shift, frequently wash hands with soap and water for at least 20 seconds, or, if soap and water are unavailable, use an alcohol-based hand sanitizer with at least 60% alcohol.

While many of the above-mentioned recommendations for OSHA are already covered by the CDC guidance, it is important to keep track of both agencies as one set of recommendations may change while the other stays the same. In these instances, restaurants should apply the more restrictive guidance.

### **Additional Requirements from the Arizona Department of Health Services (AZDHS)**

There are several documents released by the Governor's Office and AZDHS that contain specific requirements for restaurants. These must be incorporated into your policies and are enforceable by public health officials, local police departments, and the Arizona Department of Liquor Licenses and Control.

In addition to the CDC and OSHA requirements listed above, under all circumstances, the following precautions are required by restaurants providing dine-in services:

- Limit restaurant capacity to less than 50 percent of permitted fire code capacity, not including staff.
- Enforce physical distancing of at least 6 feet between customers in all directions
  - Maintain physical distancing of at least 6 feet between tables.
  - Limit parties to no more than 10.
  - Clearly mark tables and chairs that are not in use (consider removing these tables)
  - Maintain clearly marked 6-foot spacing signs along entrances, waiting areas, hallways, patios, and restrooms and any other location within a restaurant where queues may form, or patrons may congregate.
  - Bar top or counter seating is not allowed unless each party is spaced at least 6 feet apart.

- Continue to provide options for delivery, pick-up, or curbside service even if a location offers dine-in.
- Cloth face masks and frequent handwashing is required for all staff.
  - Develop and enforce standards for the use of non-medical grade masks or cloth face covering by employees.
  - Develop and enforce a handwashing policy for servers.
- Cloth face covering are required for all customers when not seated at their table.
- Post physical and/or electronic signage at the restaurant entrance of public health advisories prohibiting individuals who are symptomatic from entering the premises.
- Support healthy hygiene practices for both employees and customers:
  - Enforce hand washing, covering coughs and sneezes.
  - Supplies should include soap, hand sanitizer with at least 60 percent alcohol, and tissues.
  - Ensure hand sanitizer is available at or adjacent to entrances to the facility, restrooms and in employee work areas, or soap and running water readily accessible to staff and customers at marked locations.
  - Post signs on how to stop the spread of COVID-19, properly wash hands, promote everyday protective measures, and properly wear a face covering.
- Intensify cleaning, disinfection, and ventilation practices.
  - Wash, rinse, and sanitize food contact surfaces, food preparation surfaces, and beverage equipment after use.
  - Implement comprehensive sanitation protocols, including increased sanitation schedules for bathrooms.
  - Regularly open windows and doors to allow for increase ventilation.
- Restaurants should sanitize customer areas after each sitting with EPA-registered disinfectant, including but not limited to:
  - Tables
  - Tablecloths
  - Chair/booth seats
  - Table-top condiments and condiment holders
  - Any other surface or item a customer is likely to have touched
- Implement symptom screening for employees prior to the start of their shift.
  - Wellness/symptom checks, including temperature checks for all restaurant personnel, as they arrive on premises and before the opening of a restaurant.
- Eliminate instances where customers serve their own food, including salad bars and buffets.
- Avoid using or sharing items such as menus, condiments, and any other food.
  - Instead, use disposable or digital menus, single serving condiments, and no touch trash cans and doors.

- Wipe any pens, touchpads, counters, or hard surfaces between each use by a customer.
- Consider assigning duties to vulnerable workers that minimize their contact with customers and other employees.
- Train all employee in the above safety actions.
- Deep clean and disinfect the entire facility during non-operational hours at least two times per week.

### **ARA Recommendations**

Restaurants should review this guidance document and all the resources listed on the resource page to determine what additional regulations, requirements or best practices apply.

### **Preparing to Reopen**

Restaurants should consider the following steps when preparing to safely reopen their dining rooms:

- Review and understand the new rules issued by the Governor's Office
- Rehire and retrain staff to ensure:
  - All employees have current food handling training
  - All employees are trained on appropriate cleaning and disinfection, hand hygiene, and respiratory etiquette.
  - All employees have taken the [ServSafe COVID-19 Safety Training](#)
  - All employees understand your health screening protocols
- All food items that our out of date should be discarded
- Work with your suppliers to ensure enough cleaning and sanitation chemicals, and other supplies will be available to safely reopen
- Thoroughly clean and disinfect the facility – especially dining areas and other spaces that have been closed
- Consider modifying your layout and/or using signage and other equipment to comply with social distancing requirements
- Ensure an adequate supply of hot water as required by the food code
- Flush water lines at all faucets
- Clean out ice machines
- Clean/Sanitize all food contact surfaces
- Ensure you have all supplies for hand washing and sanitizing in both the food establishment and restrooms
  - Soap

- Paper towels
- Sanitizer and appropriate testing strips
- Toilet paper
- Hand sanitizer (for customers and if available)
- All equipment is operational (cold holding, hot holding, cooking, etc.)
  - Cold holding equipment is holding less than 41-degrees Fahrenheit
  - Hot holding equipment is providing a constant heat source greater than 135-degrees Fahrenheit
- Non-latex gloves are available and should not be reused or used for multiple tasks

## Restarting your Draught Beer System

- If Beer was left in lines and beer system maintenance was continued on a 14-day cycle:
  - Turn gas source/sources on (this may include CO2 and nitrogen if system uses a blender)
  - Reconnect keg couplers to kegs and engage (ensure both connection point on the keg and the keg coupler are clean and free of bacteria)
  - If Foam on Beer detectors (FOB's) are present in the system, refill via normal process
  - Pour beer until clear beer is flowing from faucet.
- If lines were clean and liquid was blown out of lines
  - Turn on gas source/sources (this may include CO2 and nitrogen if system uses a blender)
  - Adjust power pack to 29 degrees (normal operating temperature is 28-33 degrees)
  - Reconnect keg couplers to kegs and engage (ensure both connection point on the keg and the keg coupler are clean and free of bacteria)
  - If FOB's are present in the system, refill via normal process
  - Pour beer until clear beer is flowing from faucet.
- If the system was not shut down properly and has not been cleaned for an extended period of time, a deep clean process may be necessary to remove excessive bacteria growth – consult with your beer line manufacturer and/or distributor to find the best deep clean process for your system

## Rehiring Staff

Bringing staff back will be critical to any restaurant's successful reopening. When making an offer to return to work, restaurants should do so in writing and outline the new policies and procedures put in place to create a safe work environment. Employers should also include basic information in the offer letter such as job location, rate of pay, job duties, and schedule, even if this information has not changed since the employee was furloughed.

Keeping records of your communications with employees is critical when rehiring. Any acceptance or denial of a job offer should be recorded in writing. For those restaurants that have applied for the Paycheck Protection Program (PPP) this information will be essential in your loan forgiveness calculation (see below).

“As an exercise of the Administrator’s and the Secretary’s authority under Section 1106(d)(6) of the CARES Act to prescribe regulation granting de minimis exemptions from the Act’s limits on loan forgiveness, the SBA and Treasury intend to issue an interim final rule excluding laid-off employees whom the borrower offered to rehire (for the same salary/wages and the same number of hours) from the CARES Act’s loan forgiveness reduction calculation. The interim final rule will specify that, to qualify for this exemption, the borrower must have made a good faith, written offer of rehire, and the employee’s rejection of that offer must be documented by the borrower. Employees and employers should be aware that employees who reject offers of re-employment may forfeit eligibility for continued unemployment compensation.”<sup>3</sup>

## **Restaurant Reopening Responsibilities and Options**

### **Social Distancing & Masks**

Restaurants should maintain a least 6-feet between groups of patrons and limit group sizes to no more than 10. As an alternative, restaurant may install barriers between booths or tables that are within 6-feet of each other. Waiting areas should be kept clear. Restaurants are encouraged to use technology solutions that can notify guests when their tables are ready so that guests can wait in other locations (such as their cars). This will ensure that families or groups of friends are distanced from other groups while maximizing usable space. Guests entering the facility should be in masks. Restaurants should consider having hand sanitizer available for customers to use after removing their masks and discourage patrons from putting their masks on any surface once removed.

- Limit tables to groups of 10 to comply with CDC guidance on group size<sup>4</sup>
- Tables with guests should be at least 6-feet apart in all directions, or protective barriers should be placed between tables or booths – barriers should be glass or plexiglass to facilitate easy cleaning
- In waiting areas, a 6-foot distance should be maintained between parties, indoor and outdoor
- Technology solutions should be utilized to decrease the number of patrons waiting in or near the establishment
- Provide customers with hand sanitizer or quick access to hand washing after a customer

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<sup>3</sup> (Paycheck Protection Program Loans Frequently Asked Questions (FAQs), 2020)

<sup>4</sup> (Centers for Disease Control and Prevention, 2020)

removes their mask

- Encourage customers to store their masks in a personal bag and discourage customers from placing a mask on any surface.

## Employees

Restaurants should institute an employee health screening protocol in accordance with [CDC Guidance on screening employees for signs of COVID-19](#)<sup>5</sup>. This should include temperature checks of employees once their body temperature has adapted to the inside temperature of the restaurant. As an alternative, consider an offsite screening tool to check and verify an employee's temperature before they arrive on site (see FeverFree in the resource section). If an employee's temperature is equal to or greater than 100.4 degrees Fahrenheit or they are exhibiting any symptoms of COVID-19 (fever, cough, or shortness of breath), the employee should be sent home and instructed to follow [CDC guidance for individuals that are sick](#). Any employee showing symptoms of COVID-19 should not return to work until they have met the [CDC standards to end isolation](#).

Restaurants should adopt changes to their practices to ensure staff remain at least 6-feet apart. However, because of the unique environment of restaurants, maintaining a strict 6-foot separation of staff members may not be possible, especially in the kitchen area. Restaurants should adopt a policy requiring staff to wear masks during their shift.<sup>6</sup> If using cloth masks, the masks should be laundered after each use and used [in accordance with CDC guidance](#).

Restaurants should continue to follow the FDA Food code on glove usage.<sup>7</sup> The usage of gloves is only beneficial when a strict set of standards are followed in high risk activities. The idea of restaurant waitstaff wearing gloves might make a few people feel safer, but this can actually create a more dangerous environment for the spread of COVID-19. [A 2004 study](#) found that 50% of the time, those who were wearing gloves failed to notice punctures or tears in their gloves.<sup>8</sup> [A CDC study](#) reported that workers are far less likely to wash their hands when wearing gloves.<sup>9</sup> Proper glove use would require discarding gloves every time an object is touched, washing your hands, and donning a new pair of gloves. As an alternative, restaurants should adopt and enhanced handwashing schedule for front of the house employees and/or designate specific employees as food runner to lower contact points.

- Implement an employee health screening protocol that includes a temperature check after the employee has had time to acclimate to the building's temperature (ensure

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<sup>5</sup> (Center for Disease Control and Prevention, 2020)

<sup>6</sup> (Centers for Disease Control and Prevention, 2020)

<sup>7</sup> (U.S. Food and Drug Administration, 2017)

<sup>8</sup> (Michaels , 2004)

<sup>9</sup> (Green, et al., 2007)

employees stay separated during this acclimation period) – As an alternative, restaurant may use technology solutions to perform a wellness check on employees prior to their arrival at the facility *See resources page*

- Require staff to wear cloth masks and ensure the masks are laundered after each use
- Implement an enhanced hand washing schedule for front of the house staff, and continue to follow the high standards of the food code for back of the house hand hygiene

## Sanitation

Because the virus can survive on surfaces for a long period of time, restaurants will need to increase their sanitation schedules for commonly touched surfaces. Additionally, restaurants should consider alternatives to traditional reusable menus. Many options exist that can be used to decrease menu touch points including technology solutions (viewing the menu on a customer's phone), menu boards placed throughout the restaurants, single-use menus that are discarded after use, and an easily cleanable (such as fully laminated) menu that is cleaned and sanitized after each use.

Other touchpoints, such as tabletops and seats should be sanitized after each use. Normal tabletop condiments should be removed from tables and kept in a centralized location, only brought out at a customer's request, and sanitized after each use. All sanitation protocols should use an [EPA-registered disinfectant with an emerging viral pathogens claim](#).<sup>10</sup>

- Restaurants should consider alternatives to traditional reusable menus, such as single-use menus, technology solutions, menu boards, or menus that are easily sanitized after each use with EPA-registered disinfectant with an emerging viral pathogens claim
- Restaurants should sanitize customer areas after each sitting with EPA-registered disinfectant with an emerging viral pathogens claim, including but not limited to:
  - Tables
  - Tablecloths
  - Chairs/booth seats
  - Any other surface or item a customer is likely to have touched
- Increase cleaning and sanitization schedules for commonly touched hard and porous surfaces (see Appendix A)
- Perform increased training with staff and reinforce cleaning and disinfection protocols

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<sup>10</sup> (Environmental Protection Agency, 2020)

## Bars and Bar Area

Bars and bar areas of restaurants should ensure they have adapted their operations to comply with State rules on activities. Bars and bar areas should designate an area of the bar as a “prep-area” and disallow customers to be seated within 6-feet of that area. Additionally, bar seating should be set up to ensure groups are at least 6-feet apart from each other. Congregating in the bar or bar area should be prohibited and restaurants should eliminate self-seating and instead have patrons seated at the bar or bar area by a member of the staff. Patrons should be discouraged from ordering drinks directly from the bar if not seated at the bar top.

- Designate an area of the bar for preparing all food and drink items and ensure that no customer is within 6-feet of the designated area
- Separate bar seating to ensure that groups are at least 6-feet apart from each other in all directions
- Eliminate self-seating and ensure all patrons are seated by a staff member to ensure groups do not intermingle or take over areas not designated for seating
- Disallow direct drink orders from the bar unless the patrons are seated at the bar top

## Outdoor Seating and Air Circulation

As more information has become available, the importance of air flow has been highlighted as a key safety measure to prevent the spread of the virus. Restaurants should encourage outdoor seating (while still maintaining 6-feet of separation) as much as possible. Most cities and counties have adopted expedited extension of premises processes to allow restaurants to use non-patio outdoor spaces. Restaurants should review these processes in their individual cities and consider expanding their premises to encourage outdoor dining. While weather will play a key factor in this decision, restaurants are encouraged to have a plan in place to encourage as many patrons as possible to dine outside.

For indoor dining, restaurants should ensure the maximum air flow possible with the outside. Consider regular intervals of opening doors and windows throughout the day. If the weather permits, open any garage doors or patio windows to encourage outside airflow. Consult with your HVAC provider to determine if any settings on your air conditioner can be adjusted to decrease the amount of inside air that recycled. If fans are used to provide air flow from the outside, ensure that no customers are seated in front of the air flow from the fans.

- Encourage outdoor seating as much as possible
- Check with your local city and county on their procedures for extending your premises to increase outdoor seating
- Check with your HVAC provider about how to decrease the amount of recycled indoor air your system uses and instead maximize the amount of outside air utilized

- Consider regular intervals of venting your building with the outside by opening doors and windows
- If fans are utilized, ensure no customers or members of the public are downwind of the airflow

## Employee Positive COVID-19 Test Guidance

The guidelines below are focused on slowing the spread of the virus and protecting our staff and customers in the event one of our employees tests positive for COVID-19. As our State continues the process of reopening and more people begin to feel comfortable patronizing restaurants, there is increased opportunity for the exposure to the virus. It is more important than ever that restaurants continue to diligently follow the re-opening guidance with emphasis placed on employee cloth masks.

An employee testing positive for COVID-19 is of serious concern to any restaurant because of the increased likelihood of exposure. The ARA encourages all restaurants, including those without any positive cases, to review and implement the recommendations in the [CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease](#).

### What action should I take if an employee is suspected or confirmed to have COVID-19?

Follow CDC Guidance on cleaning and disinfection for all areas used by the sick employee.

- Close off areas used by the sick employee.
- Wait 24-hours before cleaning and disinfecting to minimize potential for other employees being exposed – If waiting 24-hours is not feasible, wait as long as possible and ensure all employees assigned to clean the area are provided appropriate Personal Protective Equipment (PPE).

**Note:** The 24-hour waiting period is to allow for airborne viruses in the area to settle onto a surface. Prior to 24-hours there is a risk that personnel sent into the area could still contract the virus from an airborne source.

**Note:** If possible, restaurants should consider the use of a third-party cleaning service offering COVID-19 remediation services.

- During this waiting period, open outside doors and windows to increase air circulation in these areas.
- If it has been 7 days or more since the sick employee used the facility, additional cleaning and disinfection is not necessary but you should continue to routinely clean and disinfect all high-touch surfaces.

- If it has not been 7 days, perform an additional deep cleaning and disinfection of the areas.
  - Clean dirty surfaces with soap and water before disinfecting them.
  - To disinfect surfaces, use products that meet [EPA criteria for use against the Coronavirus](#) and are appropriate for the surface type.
  - Always wear gloves and gowns appropriate for the surface.
  - Employees may need to wear additional PPE depending on the setting and disinfectant product you are using – for each product you use, consult and follow the manufacturer’s instructions for use.

Due to the nature of restaurant operations and the high mobility of employees, it is unlikely a restaurant would be able to isolate areas of the restaurant where the sick employee was working without impacting the operations of the entire restaurant. For this reason, the ARA recommends that restaurants close to patrons during the 24-hour waiting period and cleaning and disinfection period.

### **How should I handle employees who may have been exposed to COVID-19?**

The CDC has two separate set of recommendations. One is the traditional guidance for business operations and the second set of recommendations for critical infrastructure workers.

Under the traditional guidance, the CDC recommends businesses:

- Determine which employees may have been exposed to the virus.
- Inform employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the [Americans with Disabilities Act \(ADA\)](#).
- Follow the [Public Health Recommendations for Community-Related Exposure](#) and instruct potentially exposed employees to stay home for 14 days and self-monitor for symptoms.
- In all cases, employees continuing to work should go through a pre-work health screening, including a temperature check, and be required to wear masks in compliance with Executive Order 2020-40.

Restaurants may also rely on the second set of recommendations from the CDC for critical infrastructure employees. The U.S. Department of Homeland Security’s Cybersecurity & Infrastructure Agency (CISA) has identified restaurant operations as critical in their [Advisory Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response](#) dated May 19, 2020. While restaurant operations are listed in this memorandum, the

agency also states that the “...list of identified essential critical infrastructure workers is intended to be overly inclusive...” additionally, the memorandum states that critical infrastructure employers have an obligation to limit, to the extent possible, the reintegration of any person who have experienced an exposure to COVID-19 but remain asymptomatic in ways that best protect the health of the worker, their co-workers, and the general public. For this reason, the ARA cautions against restaurants relying on the CDC’s guidance for critical infrastructure employees. Nevertheless, a situation may arise which will require the adoption of this guidance over the traditional CDC guidance.

For critical infrastructure employees, the CDC states that workers may be permitted to continue to work following a potential exposure to COVID-19 provided they remain asymptomatic and additional precautions are implemented to protect them and the community. Employees who have had an exposure but remain asymptomatic should adhere to the following practices prior to and during their work shift:

- Undergo a wellness check: Employers should measure the employee’s temperature and assess symptoms prior to starting work. Temperature checks should happen prior to an individual entering the facility.
- Continuously monitor for symptoms: As long as the employee does not have a temperature or exhibit any symptoms, the employee should self-monitor throughout their shift.
- Wear a mask: The employee should always wear a face mask while in the workplace.
- Social Distance: The Employee should maintain 6 feet and practice social distancing as work duties permit.
- Disinfect and clean workspaces: Employers should ensure that all areas of employee contact are cleaned and disinfected on a regular basis.

If the employee becomes sick during their shift, they should immediately be sent home and instructed to follow the CDC’s guidance for ending self-isolation. Surfaces in their workplace should be cleaned and disinfected and information on persons who had contact with the sick employee during the time the employee had symptoms and for 2-days prior to symptoms should be compiled.

### **Should I notify the public if an employee is confirmed to have COVID-19?**

While it is not required to make a public statement or contact non-employee vendors or customers, a restaurant should consider getting in front of the issue by making a statement on their website or social media of the situation and outline the steps they have put in place to clean and disinfect their establishment and monitor employees.

**When should I allow an employee who tested positive for COVID-19 or exhibited symptoms of COVID-19 to return to work?**

Employers should instruct employees who have tested positive for COVID-19 or believe they have COVID-19 to follow the [CDC's recommendations for ending home isolation](#). In general, individuals who exhibited symptoms of COVID-19 (with or without a positive test result) may return to work after:

- 3 days with no fever (without the use of fever reducing medication), and
- Symptoms have improved, and
- 10 days have passed since symptoms first appeared.

If any employee will be tested they may return to work when they have no fever (without the use of fever reducing medication), symptoms have improved, and they have received two negative test results in a row, taken at least 24 hours apart.

If an employee has tested positive for COVID-19 but had no symptoms, the employee may return to work after 10 days have passed since the test, provided they do not develop symptoms. An employee that tested positive for COVID-19 but is not experiencing any symptoms may return to work if they received two negative test results in a row, at least 24 hours apart, and they do not develop any symptoms. If an employee does develop symptoms after a positive test, they should be instructed to follow the recommendations above.

**Employee management during and after a closure**

During the closure of a restaurant for the 24-hour waiting period and the disinfection period, restaurants should be cognizant of their responsibilities under the [Families First Coronavirus Response Act \(FFCRA\)](#), and [Arizona's Earned Paid Sick Time \(EPST\)](#). Additionally, employers should be aware of their responsibility under the FFCRA and EPST for employees that are required to self-isolate because of potential exposure to the Coronavirus.

- Employees that have been notified that they may have been exposed to COVID-19 and to self-isolate for 14-days or to seek testing need to be compensated under the FFCRA for up to 2-weeks (or 80 hours)
- If an employee has already used their 2-weeks of paid time under the FFCRA but still have EPST hours left, an employer must allow the employee to use their EPST hours during their self-isolation

## **Additional Resources**

[ARA Stop the Spread Poster](#)

## **Testing Resources**

- The [Arizona Department of Health Services](#) maintains a list of testing sites conducting public tests.
- Private laboratories (such as LabCorp and Sonora Quest) have contract services for employers to do on-site or off-site testing. Depending on your size, checking with these companies, and setting up a contingency plan to do mass testing quickly may be worth the extra expenditure.
- The ARA's Healthcare Partner, United Healthcare has released an [at-home test](#) for Coronavirus that ARA members can order at a discount. These tests usually provide results within 24 hours of the lab receiving the test.

## **National Restaurant Association**

- [ServSafe COVID-19 Training and Resources](#)
- [NRA Reopening Guidance](#)
- [Handwashing 101 Poster](#) (English and Spanish) and [Youtube Video](#)
- [Handwashing Infographic](#) (English and Spanish)
- [Before You Come to Work Poster](#)
- [Cleaning vs. Sanitizing Poster \(English & Spanish\)](#)

## **ECOLAB**

- [Operational Readiness Checklist](#)
- [Resuming Operations PPT](#)
- [Foodservice Opening Checklist](#)
- [COVID-19 Cleaning and Disinfecting Guidance for Public Spaces, Hospitality, Foodservice, and Long-term Care Facilities](#)

## **Wellness Checks**

ARA as partnered with WeeCare to provide ARA members access to their [Fever Free App](#) at a discounted price. The Fever Free app enables employers to receive wellness check information, including verified temperature checks, from their employees remotely.

## U.S. Centers for Disease Control and Prevention

- [Business and Workplace Resources](#)
- [What's New](#)
- [Latest News](#)
- [Environmental Cleaning and Disinfection Recommendations](#)
- [Restaurant and Bar Guidance](#)
- [Coronavirus Disease 2019 \(COVID-19\) Situation Summary](#)
- [Preventing COVID-19 Spread in Communities](#)
- [Hand Washing Posters](#)
- [How to Protect Yourself and Others \(Poster\)](#)
- [Coronavirus Symptoms](#)
- [Cloth Mask Guidance & Poster](#)
- [Stop the Spread \(Poster\)](#)

## Occupational Safety and Health Administration

- [Guidance on Returning to Work](#)
- [COVID-19 Guidance for Restaurants & Beverage Vendors Offering Takeout or Curbside Pickup](#)
- [Worker Exposure Risk to COVID-19](#)
- [Retail Workers and Employers in Critical and High Customer-Volume Environments](#)
- [Prevent Worker Exposure to Coronavirus \(Poster\)](#)
- [Guidance of Recording Cases of COVID-19](#)
- [Cloth Masks FAQs](#)

## Equal Employment Opportunity Commission

- [Pandemic Preparedness in the Workplace and the Americans with Disabilities Act](#)
- [What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws](#)

## Small Business Administration

- [Paycheck Protection Program FAQs](#)
- [SBA COVID-19 Funding Options](#)

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- U.S. Food and Drug Administration. (2017). *Food Code* . College Park, MD.

## **Appendix A**

### **List of High Touchpoints**

- **Back of House**
  - Door handles and push plates
  - Handles of all equipment doors and operating push buttons
  - Handles of dispensers (beverage, etc.)
  - Walk-in and other refrigerator handles
  - Walk-in refrigerator and freezer plastic curtains
  - Freezer handles
  - 3-compartment sink and mop sink handles
  - Handwash sink handles
  - Soap dispenser push plates at handwash sink
  - Cleaner dispenser push buttons
  - Towel dispenser handle at handwash sink
  - Trash receptable touch points
  - Cleaning tools
  - Buckets
  - Telephone keypad and handset
  - Computers
  - Office handles and safe handle
  - Microphone and point of sale register
  - Breakroom tables and chairs
  - Display screens on equipment
  - Ice scoops
  - All service area counter surfaces
  - All kitchen/fresh department counter surfaces
  - Hand and cold food storage
  - Steam tables
- **Dining Area & Front of House**
  - Door handles, push plates, thresholds and hand railings
  - Chairs, booths, bar stools, and tables
  - Trash receptable touch points
  - Any counter
  - Hostess desk
  - Drink and condiment dispensers
  - Display cases

- Self-service areas
- Point of sale registers/touchscreens
- Trays
- Menus
- Kiosks
- Other public areas
  - Door handles, push plates, thresholds and hand railings
  - Elevator buttons
  - Chairs and tables
- Restrooms
  - Door handles
  - Sink faucets and toilet handles
  - Towel dispenser handle
  - Soap dispenser push plates
  - Baby changing station
  - Trash receptable touchpoints
- Carpet & Upholstered Furniture
  - Remove visible contamination (if present) and clean with appropriate cleaners indicated for use on these surfaces, then
  - If the items can be laundered, launder items in accordance with the manufacturer's instructions using the warmest appropriate water setting for the items and then dry the items completely.
  - If the items cannot be laundered, use products that are EPA-approved for use against the virus and that are suitable for porous surfaces  
<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>.