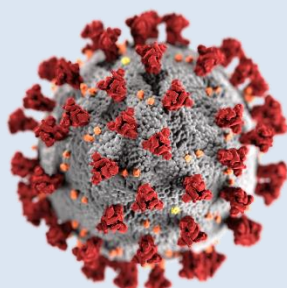


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RETAIL
MERCHANTS
OF HAWAII

HAWAII'S RETAIL RE-OPENING GUIDELINES & CHECKLIST FOR SHOPPING SAFE DURING COVID-19



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HAWAII'S RETAIL RE-OPENING SUGGESTED GUIDELINES FOR SHOPPING SAFE DURING COVID-19

The current pandemic situation is unique that no business was prepared for and will have a lasting impact on business recovery and operations. Hawaii's essential retailers have been on the front lines of this pandemic with grocery stores, pharmacies, home improvement and other essential retailers working hard to ensure every family has what they need as our customers stayed and worked from home. However, the majority of the retailers throughout our state were mandated to shut down their storefronts and furlough thousands of workers in order to protect our communities and stop the spread of the novel coronavirus.

As always, retailers' primary objective remains the health and safety of employees and customers, from distribution centers to stores. We have been learning from each other throughout this crisis, sharing leading practices and protocols to keep stores clean and sanitized, and keeping customers and employees as safe as possible. We will continue to ensure a safe retail environment through promoting healthy habits, encouraging physical distancing, enhanced cleaning procedures, adjusted operating hours, encouraging employee use of person protective equipment, and establishing vendor guidelines to name a few.

A single statewide standard is the best way to make sure the reopening of the economy is safe, efficient, and productive for all. While we recognize that each island is unique, we need to have uniform statewide protocols for retailers to adopt. The key to this approach is adopting a simple blueprint that puts in place uniform statewide rules of operations that will accomplish three key objectives:

- (1) **Protect Our Community**
- (2) **Allow for the Safe Reopening of Retail**
- (3) **Establish Clear Expectations for Employees & Customers**

This approach also allows businesses to open to the public with the confidence that all retailers will adopt the physical distancing, hygiene, and sanitization practices necessary to keep customers, employees, and the entire community safe.

Hawaii needs to open its doors in phases to ensure the safety of not only our community and customers, but especially for our employees who are the true backbone of business.

Phase 1 – Allow Curbside Pickup & Delivery

- We would like to see non-essential retailers be allowed to open their indoor retail space as soon as possible that would allow for at least shop online or via phone with curbside pickup as well as shopping by appointment or reservation with limited customers in the stores.
- This is something that could be done immediately.

Phase 2 – Re-Open Stores to the Public, with Physical Distancing Protocols & Reduced Occupancy

- Retailers encourage state governments to consider the CDC recommendations, state health departments, and other health experts to determine when to move to start opening.
- It is imperative that businesses open in ways that allow more commerce than the current status as soon as possible.
- During this phase, retailers will open stores to the public with protocols in place to ensure COVID-19 does not revert to protect the health and safety of employees and customers and mitigating the spread of the virus.

Phase 3 – Establish Protection, Then Lift All Restrictions

- We also ask the State to continue to establish personal responsibility expectations for citizens as they move about in public spaces, such as requiring cloth face coverings, washing hands frequently, and staying home when ill.



HAWAII'S RETAIL REOPENING SUGGESTED CHECKLIST FOR SHOPPING SAFE DURING COVID-19

The protocols we propose are based on the National Retail Federations recommendations that were developed in accordance with CDC guidelines and benchmarking between leading retailers who have shared their operational experiences.

This is for general informational purposes only and only regarding the COVID-19 pandemic. The following checklist represents ONLY a guidance that is building upon already existing best practices and is intended to highlight key topics to consider as retailers seek to re-open operations. This is not intended to be government mandates, rules or regulations, or legal advice.

We also recognize that there are many categories of retailers from grocers to convenient stores to kiosks, apparel stores to hardware stores, to crack seed shops to department store to big box stores... Because of this, operations, limitations and the setup of every store vary. Hawaii retailers' facts and circumstances are unique compared to other businesses.

EMPLOYMENT

The heart of returning to work is the workforce. The need to plan ahead is not limited to the initial transition back to work, but rather includes preparing for likely employee relations scenarios that will arise after returning to work. While some of these employee relations issues may be unique to COVID-19, others will not be novel, but how an employer needs to respond very well may be. Assessment of current policies and practices should be undertaken to ensure they meet the needs of the workforce and business during this transition back to work, along with the creation of new policies. In particular, development of a protocol to limit the spread of COVID-19 and how to respond if an employee contracts COVID-19 is essential. Likewise, employers should plan for how to respond to employees who are in vulnerable populations or are fearful of returning to work. Employers would also be well-served to assess factors competing with an employee's ability or interest in returning to work, such as child or elder care responsibilities or generous unemployment insurance benefits.

APPOINT RETURN TO WORK TEAM:



Consider HR, IT, facilities, health and safety team, office managers and senior management who can make company-wide decisions; identify new roles and responsibilities.



If your corporate office has created a COVID-19 "playbook", revisit the document frequently to ensure that practices and protocols are updated based on changing conditions and guidance.

DETERMINE TRANSITION PLAN:

- rmh Consider whether to
 - Reopen operations and get employees back to work as quickly as permitted under the applicable law **OR**
 - Implement a slow or phased approach. Develop a process to handle re-integration logistics. Recognize your approach may differ if you have locations on various islands or in different locations island wide.

DETERMINE WHICH SHELTER-IN-PLACE LAW AND ORDERS APPLY:

- rmh Make sure you are still in compliance with all Federal, State and County laws and codes (i.e. Fire, Food Safety...)
- rmh Monitor and follow all applicable employee and customer safety directives.
- rmh Provide employees with the tools to engage with law enforcement to the extent practices at the retail location are questioned.





IDENTIFY WHO RETURNS TO WORK AND WHEN:

- rmh Consider timing issues (e.g., bringing back all employees, or staggering return to work dates)
- rmh Amount of notice to provide employees
- rmh How many employees will be allowed in store at once
- rmh Determine if individual employees are safe to return to work by implementing screening measures
- rmh Consider plans for “at-risk” employees.
- rmh Evaluate whether any roles that have traditionally been performed in store can and should be performed remotely now.



WORKPLACE POLICIES AND OTHER PRACTICES; TRAINING:

- rmh Develop new or update existing policies and other practices and consider how such policies or protocols will be communicated to employees, including formal training.
- rmh Make sure you are still in compliance with all Federal, State and County laws and codes
- rmh Policies to consider include:
 - Leaves of absence and accommodation requests, including whether medical certification needs to be obtained.
 - Encourage employees who feel sick to stay at home.
 - Complaint procedure, including conducting remote investigations.
 - Whistleblower protections, with a particular emphasis on protocols for responding to employee complaints of violations of COVID-19 laws.
 - Suspend business travel and encourage the use of digital meetings where possible.








TRANSITION FROM FURLOUGH:

-  Prepare a communication plan for calling employees back to work.
-  Review state laws concerning recall and worker retention rights.
-  Prepare strategy for securing onboarding paperwork, including I-9s, for employees who were laid off
-  Create a plan for notifying local unemployment agency of furloughed employees who refuse to return to work.



DETERMINE HOW TO HANDLE REFUSAL TO WORK AND REQUESTS FOR ACCOMMODATIONS:

-  Consider issues around “at-risk” groups, accommodations due to logistical and other barriers to returning to the worksite, exceptions and processes for parents/caregivers when schools are closed or other caregivers are unavailable, etc.
-  Plan for swift transition to Human Resources if an employee’s rationale for not wanting to return to work or requesting an accommodation warrants engagement in the interactive process.





ESTABLISH WELL-DEFINED PROTOCOL FOR DEALING WITH SUSPECTED AND CONFIRMED CASES OF COVID-19:

-  What specific information is the employee required to disclose and to whom?
-  With whom will the information be shared?
-  Determine if there is any requirement to notify any government agencies, public authorities, or third parties.
-  If possible, implement workforce contact tracing protocol to identify and inform individuals who have been in close contact with the affected employee, and ensure such protocol complies with privacy and disability discrimination laws.
-  Plan ahead for the need to contact trace by limiting scope of employee contact through scheduling and limiting workspaces.
-  Develop protocol for how long employees with suspected or confirmed cases of COVID-19, as well as the individuals in contact with those employees, must remain away from work.
-  Consider how to respond if the contact is from a customer or a close contact of an employee.

CONSIDER SCREENING/TESTING MEASURES:



-  Consider different screening processes and protocols.
-  Should you decide to screen your employees
 - Create a policy
 - Know what type of equipment is needed and is reliable
 - Role and safety of staff performing the checks
 - Employee privacy
 - Record keeping policies
 - Protocol for when elevated temperatures are discovered, employees are ill or have been exposed.
 - Encourage employees who are feeling sick to stay home.

DETERMINE RULES FOR VISITORS, VENDORS AND OTHER WORKERS IN THE WORKPLACE:




-  Determine how or to what extent the above policies, practices, and protocols will be applicable to temporary workers, staffing agency workers, independent contractors, vendors, delivery workers, and other visitors when they are in the workplace.
-  Ask temporary workers, staffing agency workers, independent contractors, vendors, delivery workers, and other visitors to wear appropriate face coverings and other PPE.
-  Create a plan & guidance for employee who must engage with visitors, including customers, who are not adhering to the required employer or state/local mandates.
-  Expand direct store delivery windows to spread out deliveries and prevent overcrowding.

CONSIDER POTENTIAL CHANGES IN PAY, HOURS, SCHEDULES, DUTIES, WAGE/HOUR.

DETERMINE WHICH WORKPLACE SAFETY LAW AND ORDERS APPLY:

-  The law is likely to impose different requirements for masks, physical distancing protocols, cleaning and requirements, in addition to related notices.
-  Include in your consideration the impact of physical distancing requirements on shared employee spaces, such as the break room.

EVALUATE HIRING PRACTICES/HIRING NEEDS IN LIGHT OF COVID-19:

-  Evaluate the need to hire additional employees due to increased business needs or unavailability of current employee pool.
-  Assess ability to conduct applicant screening and onboarding remotely.
-  Develop recruiting checklist and interview guidelines that specific address avoiding questions about an applicant's health or health history to avoid the appearance of discriminatory practices.

LOGISTICS/OPERATIONS

A returning workforce needs a place to return to and goods to sell. This section will highlight various key considerations to keep in mind as you seek a return to normal (or quasi-normal) operations for your distribution centers, stores, and supply chains.

APPOINT RETURN TO WORK TEAM:

- rmh Consider HR, IT, facilities, health and safety team, office managers and senior management who can make company-wide decisions; identify new roles and responsibilities.
- rmh If your corporate office has created a COVID-19 “playbook”, revisit the document frequently to ensure that practices and protocols are updated based on changing conditions and guidance.

FACILITIES: DECIDING WHICH TO OPEN

- rmh **Economic Analysis:** Pre-crisis performance vs. re-opening projections; also, cost of lease termination should a given location no longer prove viable post-COVID.
- rmh **Co-Tenancy Considerations:** Have COVID-19 closures implicated one or more co-tenancy provisions in your portfolio? If so, have you taken any necessary steps to claim the relief provided under your lease(s)?
- rmh **Evaluate the Landlord/Tenant Relationship:** Is this a multi-site Landlord with cross-default considerations? Is this a location where we did not pay (or short-paid) April or May rent? If so, has a strategy been devised to restore that relationship?
- rmh **Sublease / Assignment / Give Back / Repurposing Opportunities:** Is this a site where it might make more sense to seek an alternative user or convert to a support use (e.g., ghost kitchen, BOPIS, curbside delivery, or dark store)? Do you have rights in your lease to “give back” square footage and shrink your footprint?
- rmh **Retrofit:** Do the costs of post-COVID retrofits (to meet new health and safety requirements - including physical distancing) render a site no longer financially viable?

FACILITIES: PREPARING THE STORE FOR OPENING

- rmh For leased properties, work with your landlord to obtain early access to store location to ready it for return-to-work to include by not limited to deep cleaning, retrofitting as necessary for new regulations, installation of new signage.
- rmh Thoroughly inspect facilities for any damage or issues caused by vacancy including mechanical, air, and water systems.
- rmh Clean and prepare equipment for startup
- rmh Consider installing protective measures, as necessary and/or required (i.e. stanchions, plastic sneeze guards, signage...)
- rmh Identify which vendors and/or distribution centers are functioning, and the extent to which they may be delayed or limited in their operations. Establish contingency plan for vendor disruptions.

FACILITIES: PREPARING THE STORE FOR OPENING CONTINUED

- rmh Establish protocol for monitoring store occupancy in compliance with any applicable laws.
 - If you do not have available technology to help with monitoring capacity limits, prepare to have an employee to physically monitor traffic in and out of store
 - If you are at capacity – 2 customers leave, 2 customers can enter.
- rmh If applicable, establish procedure for use of escalators and elevators to avoid crowding.
 - Have signage or floor decals indicating where customers are to stand while waiting for to access as well as in/on the escalators and elevators.

SIGNAGE TO EDUCATE EMPLOYEES, CUSTOMERS AND VISITORS

- rmh Familiarize yourself with new signage requirements & needs (occupancy, physical distancing, customer flow, By Online Pickup In Store, etc.).
- rmh Post signs at entrances notifying customers to STOP if they are sick and not to enter the store.
- rmh Signage should be in the back of the house reminding employees about physical distancing and hygiene guidance.
- rmh Consider the public relations and health & safety concerns related to any promotional signage you might otherwise normally employ.
- rmh Do you need to limit quantities of certain items or implement other anti-hoarding signage?

SUPPLY CHAIN & INVENTORY

- rmh Assess supply needs and explore options for sourcing additional supplies required for business operations; assess how to best leverage existing relationships with vendors.
- rmh Create a plan for how you will source and distribute cleaning products and PPE, accounting for existing and/or future shortages.
 - Establish a protocol to monitor this on a frequent basis as rules and health guidance ebb and flow with the prevalence of the virus.
- rmh If you have international operations, consider current challenges with respect to shipping certain products (such as face masks, hand sanitizers...) across borders. You may have to modify your traditional supply chain routing.
- rmh Establish procedure for regularly disinfecting inventory and newly received deliveries.
- rmh Establish protocols for handling and processing shipping and receipts (including disinfection).
- rmh Evaluate current situation as it relates to ports of entry and trucking logistics for your product. Will this impact your ability to timely re-supply, both now and in the medium term? Keep an eye out for future legislation which might have the effect of requiring truck drivers to quarantine upon crossing state-lines, etc., thereby further disrupting the supply chain.

BUSINESS HOURS

- rmh Adjust store hours of operation, as necessary, to support physical distancing efforts by limiting store traffic.
 - Ensure that if you have new hours to post them on your social media page as well as on your website.
- rmh Ensure staff has sufficient time to rest, sanitize and restock inventory.
- rmh Offer Kapuna and other high-risk individuals' exclusive early hours before the store is open to the public.
- rmh Consider increasing pickup hours to serve more online customers, promote physical distancing and reduce the size of the crowds in the store.

ESTABLISH PROTOCOL FOR VENDORS & NON-EMPLOYEES

- rmh Notify vendors of re-opening, and any revised protocol as it relates to store entry, deliveries, paperwork, etc.
- rmh Consider implementing measures to ensure vendor safety, including:
 - Transitioning to contactless signatures/e-signatures for deliveries.
 - Adjusting store delivery windows to spread out deliveries.
 - Requesting that vendors accessing your store locations to direct their employees follow all physical distancing guidelines and health directives issued by the applicable public authorities.

SECURITY OPERATIONS

- rmh Revise security protocol to conform to local & state health directives.
- rmh Consider in-store announcements to remind customers of proper traffic flow and queuing protocols.
- rmh Review and update your anti-shoplifting procedures
- rmh Consider employee training in safe de-escalation – both in the case of shoplifting as well as customer violation of health and safety rules.

PROMOTE “CONTACTLESS” SHOPPING OPTIONS

- rmh On-line shopping of By Online Pick Up at Store
 - Be prepared for demand and adjust online availability if items become unavailable or place limits on items.
 - Limit location pick ups or delivery only to minimize employee/customer contact
- rmh Contactless payment options (e.g., RFID credit and debit cards, Apple Pay, etc.).
- rmh Self-checkout.
- rmh Pickup and delivery services.

MERCHANDISE



Returns and Exchanges

- Consider suspending or modifying return and exchange policies.
- If you are accepting returns, establish procedures for processing, handling, and disinfecting returns and exchanges.
- Consider requiring returned items to be sealed and stored separately, requiring employees to use PPE to process, handle and disinfect returns, and storing returns in isolation for a safe time period before returning them to sales floor.



Fitting Rooms

- Decide whether to re-open fitting rooms or re-open only a select few.
- If you decide to open them, ensure fitting rooms are “customer ready” by cleaning prior to any customer usage.
- Similarly, ensure that fitting room is properly sanitized after each customer use.
- Encourage customers to use hand sanitizer/wipes before trying on items and to keep protective mask on during fitting.
- Determine procedure for disinfecting fitting room items (not just clothing, but also jewelry, eyewear, etc.). For example, consider having items that have been tried on segregated and steamed, and wait a safe time period before putting items back on sales floor.



Product Sampling and Beauty & Fragrance Testing

- Prohibit customers from being able to access product samples and beauty & fragrance testers on their own.
- Have employees distribute product samples; and/or apply the fragrance and beauty testers using a clean applicator for each individual use as well as disinfecting the testers after every use.
- Consider removing product sampling and testing from the sales floor.

HEALTH POLICY

A returning workforce needs appropriate health polices, practices, engineering controls, and protective equipment. Employer practices should be designed to discourage contagious employees and customers from entering the store, screen those who enter, and mitigate the effect of contagious individuals in the store. This section will highlight various key health protections and safeguards to keep in mind as you seek a return to normal (or quasi-normal) operations for your distribution centers, stores, and supply chains.

PHYSICAL DISTANCING



Place signage in conspicuous locations throughout the store (i.e. high-traffic areas such as entrances and exits, checkouts, fitting rooms, etc.) Signage may include:

- Asking customers and employees not to enter the store if they are sick or have felt sick within the last 72 hours.
- Encouraging customers and employees to maintain physical distancing at all times.
- Floor markers to help with physical distancing where customers are likely to linger or gather (i.e. registers, service counters furniture displays and waiting areas...)
- Entrance-exit or one-way only signs.
- Signage on recommended hygiene practices, how to stop the spread of germs.
- Signage promoting frequent and thorough handwashing in all restrooms.
- Requesting customers temporarily cease using reusable bags, or to bag their own purchases if they choose to use reusable bags, and to clean reusable bags
- Information on pick-up/carryout options.
- Health screening of employees or third-party contractors and turning away anyone with fevers or showing signs of illness.



Capacity limits have been implemented, consider distance markers outside of the store for customer to maintain physical distance and having employee(s) to assist customers with waiting to enter.



Consider programming in-store audio messaging to frequently remind employees and customers to follow CDC guidance on hygiene and physical distancing.



Consider widening high-traffic areas if the configuration of the store allows.



In-store bars and public seating areas should also have physical distancing. These areas should include but are not limited to shoes, barber and beauty shops, restaurants and patios.



For checkout counters that do not allow adequate distance between the customer and employee, consider

- Installing Plexiglas or a plastic sheet “sneeze-guards”, portable barriers, or using face shields.
- To the extent possible, stagger use of point-of-sale terminals and other workstations.
- Encourage use of contactless options for transactions
- Have payment options if available for employees and patrons
- Contactless signatures for deliveries. If contactless signature for deliveries is not possible, require employees to use own pen.
- Encourage employees to practice physical distancing during pickup and delivery by
- Talking to the customer through a passenger window
- Loading items directly into the customer’s trunk without contact or leaving items at their door.



Where possible, employee shifts and meal breaks have been staggered to avoid crowding.



Employee break rooms or areas should also have physical distancing seating.

FACE MASKS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

- rmh Require employees and customers to wear facial coverings while in the store.
- rmh Consider providing gloves and other personal protective equipment (PPE) if possible.
 - If employees are permitted to use their own face masks and PPE set terms and conditions to include what is appropriate and expected daily cleaning.
 - Designate receptacles for discarded face masks and other PPE products

CLEANING / SANITIZATION

- rmh Obtain cleaning products that are on the EPA's List N: Disinfectants for Use Against SARS-CoV-2. When EPA approved disinfectants are not available, alternative disinfectants should be used (for example, 1/3 cup of bleach added to 1 gallon of water, or 70% alcohol solutions).
- rmh Cleaning "kits" including disinfectant wipes or sprays, disposable gloves, paper towels, masks, hand sanitizer and other cleaning supplies are readily accessible throughout store, including point of sale terminals and other stations that will be cleaned periodically throughout the day.
- rmh Implement a cleaning regime that targets frequently touched surfaces and spaces, which are most likely to result in the transmission of communicable diseases:
 - General:
 - ✓ Shopping carts and baskets: Clean carts and shopping baskets after every use
 - ✓ Door and drawer handles.
 - ✓ Light and other power switches (consider signage to keep lights on at all times or utilizing exiting motion sensor capabilities).
 - ✓ Shared tools such as pricing guns, pallet jacks, tape guns, box cutters, etc.
 - ✓ Chairs, tables, and benches.
 - ✓ Vending machines and self-serve kiosks.
 - ✓ Refrigerators, microwave, and other frequently touched objects and surfaces in employee breakroom.
 - ✓ Time clocks
 - ✓ Handheld devices, equipment and machinery
 - Point of sale/checkout:
 - ✓ Cash register, including touch screens, keyboards, mouse.
 - ✓ PIN Pads (touch screen, keypad, and pen).
 - ✓ Checkout counter and/or conveyor belt.
 - ✓ Cabinet and drawer pulls.
 - ✓ Checkout dividers.

CLEANING / SANITIZATION CONTINUED

- Restrooms (consider temporarily closing restrooms to public, if possible):
 - ✓ Door handles and flush levers.
 - ✓ Toilet bowl and toilet paper holder.
 - ✓ Sinks and faucets.
 - ✓ Paper towel holders and/or air dryers.
 - ✓ Diaper-changing stations.
 - ✓ Restock bathrooms more frequently
- Sales floor:
 - ✓ Fixtures with handles or pulls.
 - ✓ Any other identified “high-touch” surfaces.
- Back of the House:
 - ✓ Pallet jacks, ladders, supply carts, rolling clothing racks
 - ✓ Any other identified “high-touch” surfaces.



Hand sanitizer

- Available for customers at least at the store entrance
- Available for employees use especially at checkouts, when having to deal directly with the public, in employee breakroom and areas.

EMPLOYEE TRAINING



Prepare talking points and tips for leaders to use when communicating COVID-19 information and that encourages and reminds employees to follow physical distancing guidelines and recommended hygiene practices of cleaning hands, wearing a face mask, cleaning procedures...



Post signage at time clocks, in breakrooms and employee restrooms about the importance of practicing hygiene, physical distancing and healthy habits.



Regularly communicate the latest safety protocol as well as have easy to access resource documents that help to ensure your guidelines are understood and followed.



Remind employees on how to properly wear, remove, and dispose of face masks and other types of personal protection equipment.



Guidance on how to launder cloth face masks and uniforms if having to do it at home.



Cleaning protocol, including how to safely and effectively use cleaning supplies.



Remind employees that preexisting safety rules and regulations must continue to be observed.

- Be flexible in the routine to mitigate COVID-19 risks while continuing to follow all health and safety regulations currently in place