

Best Practices for Mall and Shopping Center Operators to Prevent Transmission of COVID-19

Malls and shopping centers are public venues that often draw large crowds in common areas and are commonly enclosed buildings. COVID-19 is spread most commonly from person-to-person, primarily through inhalation of respiratory droplets from close contact (within about 6 feet) or, less commonly, through airborne transmission (particularly in enclosed spaces with inadequate ventilation). It can also spread when someone touches a contaminated surface, and then touches their nose, mouth, or eyes.

For workers employed by mall vendors such as retail stores, salons, and restaurants, see guidance specific for those industries on preventing virus transmission and providing other protections, such as personal protective equipment. Suggested best practices for mall and shopping center operators to prevent transmission of COVID-19 among workers and customers are provided below.

Follow Local and State Guidelines

- The COVID-19 pandemic is dynamic and is constantly evolving; mall operators should be aware of changing conditions, such as infection rates in their community.
- Stay up-to-date with local, state, and federal requirements, mandates, and guidelines related to malls and shopping centers, and incorporate those changes into facility operations and communications.



Install Engineering Controls

- Consider installing physical barriers in areas where physical distance cannot be maintained (e.g., utilizing clear plastic barriers at information desks).
- Consider using rope and stanchion systems to keep crowds away from workers in areas outside restaurants and stores.
- Consider working with a heating, ventilation, and air conditioning (HVAC) professional to optimize building ventilation, as per OSHA guidelines.

 Use HVAC system filters with a Minimum Efficiency Reporting Value (MERV) rating of 13 or higher, where feasible.

Implement Administrative Controls

- Display large and clear signage at mall and store entrances directing workers and customers to stay at least 6 feet from each other. Consider additional signage within stores or common areas to serve as additional safety reminders. Provide signage in additional languages, if feasible.
- Install floor markers and other signage to control traffic flow.
- Display signage at elevators, escalators, and restrooms that limit the number of occupants or users, and consider blocking off every other bathroom stall/urinal.
- In accordance with state and local requirements, limit the number of individuals allowed in the mall at a given time to ensure space for physical distancing.
 - Monitor entrances to ensure capacity limits are not exceeded.
 - Install controls, such as markings or barriers, to ensure individuals waiting to enter the mall keep 6 feet apart from each other.
 - Encourage stores and vendors to limit the number of patrons allowed within their space at a given time.
- Only allow vendor carts or kiosks to operate in aisles or walking areas if they do not interfere with updated foot traffic measures or inhibit physical distancing requirements.
- Remove or rearrange seating to allow for physical distancing and to discourage gathering.
- Close children's play areas, carousels, rides, or arcades, if required by state or local laws, or if adequate physical distancing cannot be maintained.
- Encourage all dining establishments and food court tenants to keep tables at least 6 feet apart and block off tables when necessary.

Wear Face Coverings

- Follow local or state mandates for workers and visitors to wear face coverings over their mouth and nose, and if such mandates do not exist, encourage use of face coverings according to CDC guidelines.
- Post signs about face coverings and their proper use at all entrances and throughout the mall.

Clean High-Touch Surfaces Frequently

- Establish a regular schedule of cleaning and disinfecting high-touch surfaces using disposable gloves and Environmental Protection Agency (EPA)-registered disinfectants.
- High-touch surfaces can include:
 - o ATMs
 - o Banisters & railings
 - Benches & other hard seating surfaces
 - Child play areas (if open)
 - Door knobs and handles
 - o Elevator buttons
 - Worker breakrooms
 - o Restrooms
 - Food court tabletops, chairs, and trash receptacles
 - Point of sale systems
 - Public address system
 - o Stair and escalator handrails
 - Touchscreen signs and kiosks
 - o Trash receptacle touch points
 - Shared transportation equipment (e.g. wheelchairs, strollers)

Promote Hand Hygiene

- Display signs encouraging proper and frequent handwashing for workers and for customers.
- Provide hand sanitizer (containing at least 60% ethanol or 70% isopropanol) at mall entrances, touch-screen kiosks, vending machines, food courts, and store entrances.
- Consider promoting electronic payment for goods/services over the use of cash transactions in order to minimize hand contact/interactions with cash.

Personal Protective Equipment (PPE)

- For normal job tasks that require PPE (e.g., gloves for cleaning and disinfecting), provide PPE in accordance with the OSHA PPE standard (29 CFR 1910.132).
- If respirators are required to protect mall workers (e.g., janitors exposed to vapors from disinfectants) follow the requirements of the OSHA Respiratory Protection standard (29 CFR 1910.134).

Communicate with Workers and Other Employers

- Develop a plan to ensure all procedures or changes are clearly communicated with workers, customers, mall tenants, delivery workers, and contracting or temporary agencies suppling labor (e.g., security personnel and cleaning staff). Share information using multiple platforms, including written communications, signs, pre-recorded intercom announcements, the mall or shopping center website, and social media. Communicate the plan in multiple languages, if appropriate.
- Encourage workers to self-monitor for COVID-19 symptoms and stay home when sick. Post signs reminding workers and mall visitors to stay home when sick.

Collaborate with Mall Tenants, Contractors, and Temporary Agencies

Encourage mall tenants, contractors, and temporary agency employers to:

- Develop COVID-19-specific procedures for health and safety including worker attendance policies. Policies should address illness (e.g., sick leave polices; return to work after illness or quarantine; plans for cooperating with local health authorities and informing workers if they contact another worker or customer with COVID-19; if and how symptom screening will be done).
- Develop and implement curbside pick-up protocols to decrease the number of visitors entering the facility. Mall operators could dedicate and mark-off certain areas to facilitate curbside-pickup.
- Set capacity limits based on each store's volume and in accordance with state and local requirements.

Holiday Considerations

- Implement creative solutions to limit contact between workers and the public (e.g., virtual visits with holiday characters).
- Avoid events such as performances and concerts that could draw large crowds or that could encourage people gathering in an area.

This guidance is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards. The recommendations are advisory in nature, informational in content, and are intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with safety and health standards and regulations promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, the Act's General Duty Clause, Section 5(a)(1), requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.

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1-800-321-OSHA (6742)

TTY 1-877-889-5627)