

Risk Alert:

Considerations for Reopening Retail Stores During a Pandemic

Pandemics create significant challenges for businesses that interact with the general public. Most retailers, especially those whose stores had to close for a period of time, are faced with challenges with not only infectious disease control but reopening stores with a workforce that may have left the retailer for other “open” employers. The ever-changing guidelines and/or requirements from the Centers for Disease Control and Prevention (CDC), the Occupational Safety and Health Administration (OSHA), and a variety of governmental authorities will mandate the minimum standards under which a retailer will be able to resume operations.

As retailers evaluate, and really re-evaluate on an ongoing basis, their revised processes and compare to current governmental guidelines, there will be situations where the scenario may not be explicitly delineated in government guidance documents. This document is intended to identify, for operational leadership teams, the activities a retailer may need to implement during the reopening of a store that mitigates the risk of infectious disease exposure to your team members (TM) and customers.

Further exacerbating the challenge, infected persons may not be symptomatic and can spread the disease for up to 14 days. Operational readiness requires several areas to be considered when reopening a store, including team member safety, customer safety, facility management, operational procedures, and vendor interaction. The following questions represent a sample of questions a retailer should consider as they prepare for reopening.

Team Member (TM)	Customer	Facility	Operations	Vendors
How will team member training be completed and documented?	How will the store manage customer noncompliance with pandemic protocols?	What are the store’s “high touch” areas?	Will the store stay open if notified of a TM positive test?	Are vendors aware of and trained at or above your protocols?
What personal protective equipment do TMs need?	How should merchandise be cleaned after being touched?	Does signage at entrances indicate the symptoms of the virus and to “Not Enter” if possessing?	How will the store evaluate the execution of pandemic protocols?	Is a change required in vendor delivery or servicing schedules?
How/when do TMs report symptoms and safety concerns to management?	What if a customer has noticeable symptoms?	How will the store be cleaned if notified of a positive test?	How and when will issues be escalated to retailer’s crisis response team?	Are the workers’ compensation (WC) healthcare providers receiving new patients?

To learn how Aon can empower results for your organization, contact:

Deborah E. Weigand
Managing Director
Casualty Risk Control
Commercial Risk Solutions
Aon
1.248.936.5217
deborah.weigand@aon.com

Rob Connery
Senior Consultant
Casualty Risk Control
Commercial Risk Solutions
Aon
1.704.315.9572
robert.connery@aon.com

Bruce Fyfe
Senior Consultant
Casualty Risk Control
Commercial Risk Solutions
Aon
1.949.697.0021
bruce.fyfe@aon.com

Prepare, Prevent and Respond

As local governments authorize businesses to reopen, retailers must be ready to meet the new demands of the workplace – and meet them in accordance with OSHA, the CDC and governmental orders and/or published guidance to businesses – to help them prepare, prevent and respond to the safety and health challenges of infectious diseases in the workplace and retail spaces.

Prepare – Post-Pandemic Start-Up Plan

Regardless of whether a business is planning to restart, ramp-up, or is already fully operational, it must have a plan to address the increased need for workplace and customer safety. This plan need not be overly complex; it can be incorporated into an organization’s broader emergency response or safety plans. At a minimum, the plan should address:

1. A post-pandemic start-up team
2. Complying with regulatory requirements and OSHA guidance
3. Prevention controls and personal protective equipment (PPE)
4. Hiring and re-hiring for safety considerations
5. Isolation and social distancing protocols
6. Housekeeping and disinfection procedures
7. Returning to the retail store and ongoing safety and health training



Prevent – Engineering and Administrative Controls

With no vaccine or widespread drug therapy, employers are implementing engineering and administrative controls to ensure worker safety. Retailers should have, at a minimum, a basic understanding of these controls, and how to apply them to their various store configurations and spaces.

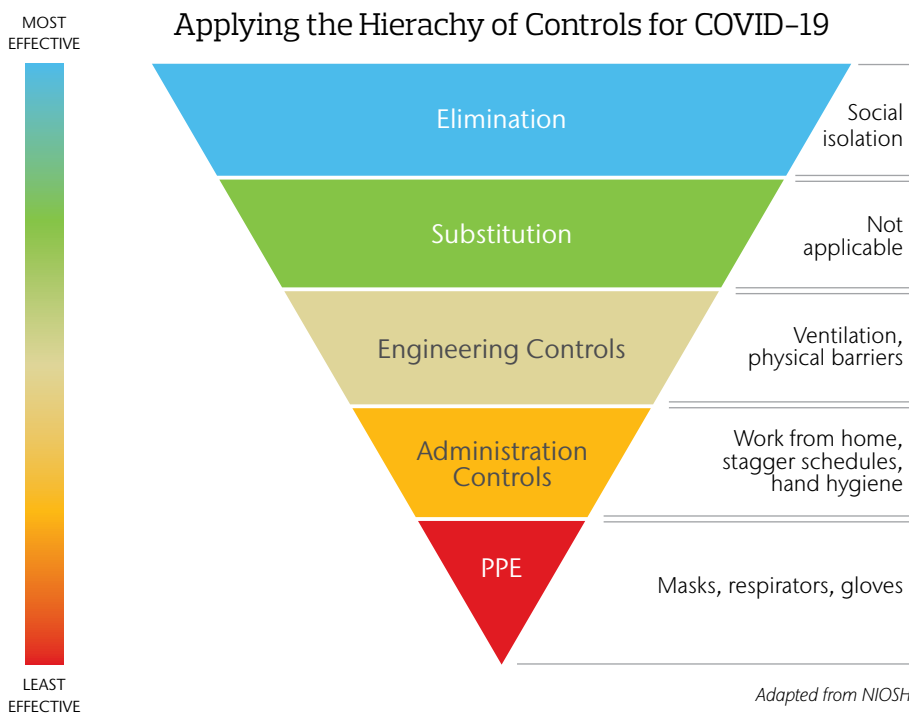


Figure 1: Applying the Hierarchy of Controls for COVID-19. Adapted from the [CDC](#) website.

Source: “Can a Mask Protect Me? Putting Homemade Masks in the Hierarchy of Controls”, April 2, 2020, Kirsten Koehler, PhD and Ana Rule, PhD, Environmental Health and Engineering, Johns Hopkins Bloomberg School of Public Health

Engineering controls – these may include changing the store layout, limiting entrances/exits, installing physical barriers and screens, creating temperature checking stations, updating HVAC systems and air filtering equipment. These options are available, but can be challenging and costly to implement.

Administrative controls – changing the worker and the customer experience, behavioral expectations of both, and their perception of risk. These controls are not specifically spelled out in OSHA standards or CDC Guidelines and present retailers with many decisions to safely reopen stores. These include:

1. Handwashing and personal hygiene – signage, policies, training, and convenient facilities to encourage proper hand hygiene,
2. Health screening – pre-shift symptom surveys, temperature checks, and “active surveillance”,
3. Stay at home policies – communications to encourage sick workers to stay at home,
4. Frequent cleaning and disinfection protocols – restrooms, fitting rooms, customer checkouts, shopping carts, and other high touch areas, the use of EPA approved cleaners to disinfect common areas, shared tools/equipment, and hard surfaces,
5. Operational procedures – review processing of returns, fitting room procedures, customer capacity, services offered, security, store layout, etc.
6. Onsite safety monitoring – regular audits and observations to ensure that social distancing and other safe work practices are being used,
7. Employee training – company pandemic protocols, personal protective equipment, illness and incident reporting, safe work practices, etc., and
8. Flex hours/staggered shifts and breaks, work from home – changes employers can make to separate workers, create breaks and promote social distancing.

Personal Protective Equipment – PPE is considered the last line of defense from health and safety hazards and is used primarily when other engineering and administrative controls are not effective or impractical. Generally considered the be the least desirable hazard control, PPE relies on the employer to provide the appropriate PPE and for the employee to properly use it.

Respond

Be prepared to respond to injury and illness claims from both team members and customers and partner with corporate stakeholders to ensure that prompt, thorough incident investigations and reports are completed. Have a process in place for coordinating appropriate isolation, medical treatment, and returning to the workplace, anticipating questions regarding work relatedness, medical leaves, and absence management. State and insurance carrier mandates on coverages and compensability may also vary. It will be important to communicate effectively on a case-by-case basis with affected carriers, employees and customers.

Additional Resources

<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>

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