Recommendations for Modifications of Self-Service Displays in the Retail Food Industry Due to COVID-19

Understanding that SARS-CoV-2 (the virus that causes COVID-19) is transmitted primarily through respiratory droplets and not known to be a foodborne virus, the following is meant to provide guidance to jurisdictions and retailers to use a risk-based approach in reopening bulk and self-service displays within the retail food industry. The easing and addition of COVID-19 restrictions for bulk self-service displays in the retail food industry will evolve as the current pandemic situation dictates from a public health perspective. Individual jurisdictions should account for the local COVID-19 infection rate and/or local ordinances when applying these recommendations. As communities move through the phases of reopening, they can work with the grocery industry to reopen facilities based on risk, customer needs, and operational controls in place.

Ongoing Control Assessment Process

Throughout the duration of the COVID-19 pandemic, the retail establishment should incorporate the most current information and guidance available regarding COVID-19. In some instances, customer expectations may exceed the public health restrictions and dictate additional preventative steps.

The following are key factors to consider:
1) Level of COVID-19 illnesses in the community.
2) Employee health and hygiene practices and adherence to recommendations from public health officials.
3) Promotion of social distancing and prevention of customer congregation.
4) Employee and public compliance with mask requirements and use of physical barriers.
5) Frequent cleaning and disinfection of common touchpoints.
6) Provide hand sanitizer stations accessible to customers.
7) To the extent possible, consider increasing outside air intake.

1) Level of COVID-19 in the Community

As the level of COVID-19 in the community increases, restrictions should be put in place accordingly. The level of restrictions should appropriately reflect the rate of disease transmission in the community. For example, during a period when the infection rate is relatively low, easing restrictions may be deemed appropriate, but as cases of COVID-19 in the community increase, restrictions may need to be reinstated. During a period of relatively high spread, it may be appropriate to suspend self-service activities or revise self-service activities commensurate with the risk assessment.

2) Employee Health and Hygiene (https://www.cdc.gov/coronavirus/2019-ncov/index.html)

The following administrative controls may be used to ensure employee health and hygiene:
- Educate employees to contact managers or supervisory individuals and not to report to work if they have any COVID-19 symptoms, if they have tested positive for COVID-19, or if they are under quarantine due to a confirmed or potential COVID-19-positive close contact.
- Screen or survey employees for COVID-19 symptoms prior to entering the worksite.
- Place signage at entrances informing about COVID-19 symptoms and that anyone with symptoms should not enter the premises (https://www.cdc.gov/coronavirus/2019-ncov/communication/print-resources.html?Sort=Date%3A%3Adesc)
- Identify and exclude employees that are close contacts of positive individuals (household members, commute together, caregiver, etc.) according to Centers for Disease Control and Prevention (CDC) guidance and definition of close contact.
- Establish policies and effective practices to prevent ill employees from working in any area of the establishment.

3) Promotion of Social Distancing and Prevention of Customer Congregation

The following approaches may be useful for effectively managing customer flow:
- Markers on floors (6 ft. intervals) indicative of proper social distancing.
- Allow adequate space around self-service display fixtures and modify traffic flow if appropriate.
- One-way traffic flow indicated by floor markers, signage, or other physical barriers, when space is limited or where feasible.
- Staff assistance when needed to direct customers.
- Audio messaging to reinforce distancing (i.e. overhead speaker announcements.)
- Plexiglass and/or other physical barriers in close service areas.

4) Employee and Public Compliance with Mask Requirements and Physical Barriers

- Based on public health recommendations and/or other scientific guidance, mask usage for employees, service personnel, delivery personnel, and contractors working in or entering the operation may be required.
- With mask requirements varying geographically, operators should strongly encourage mask usage by customers. A retailer may want to consider a consistent policy for customer mask usage across the entire brand to maintain consistency, regardless of mandates. Mask usage should comply with state or local governmental executive orders.
- See CDC mask guidance at: https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html
- Physical barriers such as plexiglass may be used in high contact areas where practical, such as check-out counters.

5) Frequent Cleaning and Disinfection of Common Touch Points

Although COVID-19 is primarily transmitted through respiratory droplets, cleaning and disinfection of common touchpoints may aid in reducing the risk of disease transmission.

- Limit direct contact with utensils and dispensers by providing deli/wax papers, disposable gloves, and trash receptacles for disposal as alternative means where feasible.
- Determine cleaning frequency based on the frequency of customer contact.
- Heightened cleaning and disinfection of utensils and other surfaces such as display door handles, etc. that are touched by customers, with additional consideration on frequency during peak business hours, should be implemented.

Risk Mitigation in Assessing Control of Self-Service Items and Areas

Based on a risk assessment the control level will vary by operation, the following matrix is an example of a tool which may be used as a guide to assess self-service displays within each retail facility. Control level for similar operations may vary by facility.

	Low Risk	Medium Risk	High Risk
Social Distancing	Unlikely customer gathering point	Consistent customer traffic; potential for gathering is low	Customers gather more frequently at certain times
Customer Contact	No direct contact with utensils	Direct contact with disposable utensils	Repeated direct contact with dispensing utensils
Packaging	Packaged or individually wrapped	Unpackaged display behind barrier (i.e. doors)	Unpackaged display
Variety of Items on Display*	Limited selection	Moderate selection	Large selection

*Variety of items offered on display needs to account for peak business times and effective social distancing.

Minimum Control Expectations

- Implement advisory signs for dispensing method changes and social distancing reminders for consumers.
- Implement disposable glove or deli/wax paper use, consider hand sanitizer station(s) and a predetermined utensil and high touch-point cleaning and disinfection frequency.
- Increase daily routine supervision and maintenance of the display.
- Ensure adequate staffing of self-service areas to facilitate effective supervision, sanitation, maintenance, and social distancing.

Considerations for Specific Types of Self-Service

- Soda and beverage stations:
  - If disposable cups are provided, store in a secured area to hand to customers with purchase or use a dispenser that only dispenses one cup, preventing customers from touching multiple cups.
  - Dispensers with buttons need more frequent disinfection on the buttons.
  - Suspend refill service and use of reusable cups where community response measures indicate it may be necessary.
  - Effectively manage social distancing.
- Bulk bins
  - Bins with gravity fed or auto-dispensing lever and other mechanisms would be considered low risk.
  - Consider pre-packing bulk ready-to-eat foods from scoop type bulk displays.
  - Require use of store provided packaging; do not allow customers to bring their own packaging or containers.
- Temperature controlled (hot or cold) self-serve food bars
  - These should only be allowed if social distancing can be maintained at all hours of operation and state or local regulatory mandates may require masks.
  - Strongly consider management of social distancing with staff direction of customer traffic especially during known peak times.
  - Consider reducing selections or having employees serve product, based on community COVID-19 levels.
  - Limit direct contact with utensils and dispensers by providing deli/wax papers and disposable gloves as alternative means where feasible.
  - Determine cleaning frequency based on the frequency of customer contact.
  - Periodically replace utensils that are touched by customers. Increase the frequency of replacement during peak times.

These are recommendations based on guidance from FDA, CDC, and local and state regulatory officials. As with many processes encountered during the COVID-19 pandemic, information changes, best practices change, customer expectations change, and we continue to learn more as scientific studies are published. Public health trends and data should be used in decision making to reopen retail self-service areas.

Additional guidance to jurisdictions proceeding with gradual re-opening of the retail food industry can be found here.

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