COVID-19
ENVIRONMENTAL HEALTH GUIDANCE FOR RE-OPENING TRIBAL NON-ESSENTIAL BUSINESSES
WORKING PAPER 1.1

The purpose of this document is to provide Tribal leaders with some resources and information to guide their decision-making around reopening businesses and resuming community operations. These decisions should be guided by cultural values, non-maleficence, and grounded in public health principles.

Public Health Principles

Tribes should consider initiating the reopening process when the following are met:
1. downward trajectory of number of new cases for at least 14 days;
2. rapid diagnostic testing capacity is sufficient to test, at minimum, all people with COVID-19 symptoms, including mild cases, as well as close contacts and those in essential roles;
3. the healthcare system is able to safely care for all patients, including providing appropriate personal protective equipment for healthcare workers; and
4. there is sufficient public health capacity to conduct contact tracing for all new cases and their close contacts.

Tribes should also have a plan in place for what to do when the number of new cases rises again and/or they discover a case has visited one of their establishments.

Risk assessments should be integrated into the decisions around reopening. Risk assessments are formalized processes to evaluate risks and hazards. Assessing the risks of easing social distancing measures and restarting parts of the economy requires a measurement of the likelihood of increased transmission and the consequences of that transmission. Likelihood in this case means the probability that reopening a business, school, or other organization where people congregate will cause significantly increased transmission. Consequence is the impact that increased transmission could have on individuals or communities if a business, school, or other organization reopens or eases social distancing measures.

In addition, there are mitigation measures that can decrease both the likelihood and consequences of transmission. Hierarchy of controls is a concept used by the National Institute for Occupational Safety and Health as a framework for identifying controls for potentially harmful workplace hazards. Using a modified hierarchy of controls, COVID-19 mitigation measures can look like:

- Physical Distancing — wherever possible having people work or access the business from home; this should include restructuring responsibilities to minimize the numbers of workers that need to be physically present, and reducing the number of patrons allowed in the business
- Engineering controls — creating physical barriers between people (e.g., clear plastic panels between cashiers and customers)
- Administrative controls — redistributing responsibilities to reduce contact between individuals, using technology to facilitate communication
- PPE — having people wear nonmedical cloth masks

Regardless of business specific considerations, there are measures that can be taken to mitigate the risk of infection to protect individuals:

- Use of nonmedical cloth masks
- Incorporating engineering controls such as physical barriers where possible
- Reconfiguring space to enable people to be located apart (ideally, at least 6 feet)
- Supporting and allowing employees to remain at home if they are unwell or have been in close contact with someone who is sick

Food Service Specific Considerations

1. Make sure employee health policies are in place, updated, communicated to employees, and easily understood. Consider employee temperature screening if necessary.
2. Maintain or increase frequent cleaning of high touch surfaces within your facility
3. Look at your operating procedures for sanitizing and disinfecting. Make sure workers have proper training, proper equipment, and access to products according to EPA's registry of disinfectants.
4. COVID 19 cannot be transmitted through food. Practice safe food preparation practices to avoid foodborne illness.
   - Follow the 4 key steps to food safety: Always — Clean, Separate, Cook, and Chill.
   - Observe established food safety practices for time/temp control, preventing cross-contamination, hand washing, exclude sick workers, storage of food, etc.
5. **Specific Mitigation Measures**
   - Strict physical distancing of customers (> 6 feet between people); consider limiting the amount of time each customer spends in the facility.
   - Limit the number of customers to keep physical distancing (≤10 customers)
   - Consider installing temporary clear plastic barriers around table/booth settings, at host stands, registers, other points of interface with customers
   - Use a chalkboard menu or disposable menus
   - Discontinue buffets, salad bars, and beverage stations
     - If buffets remain open:
     - maintain physical distancing by only allowing one person at a time through buffet
     - an attendant should monitor the buffet (wearing a face mask and gloves)
     - the attendant should bring a plate and serving utensils to all patrons at their table for single use self-service
   - Re-design the layout and use a pick-up window for food if available
   - All servers and attendants should wear a face mask and gloves
   - All hosts/greeters, cashiers, and anyone with direct interface with customers should wear a face mask
   - Assign specific tasks to chefs and food handlers, and establish food prep and cook stations to maintain physical distancing
   - Install hand sanitizers at the point of entry and near each table setting for customers
   - Ensure extra napkins and facial tissues are available for customers
   - Increase outdoor air ventilation as much as possible and improve HVAC filtration to MERV-13 or the highest level achievable
   - Cleaning and disinfecting plan – standard table cleaning after each customer finishes and deep cleaning after closing

References and Attachments:
- Johns Hopkins University, Public Health Principles for a Phased Reopening During COVID-19, https://www.centerforhealthsecurity.org/our-work/pubs_archive/pubs-pdfs/2020/reopening-guidance-governors.pdf
- FDA, https://www.fda.gov/food/food-safety-during-emergencies/best-practices-retail-food-stores-restaurants-and-food-pick-updelivery-services-during-covid-19
- National Restaurant Association, https://restaurant.org/Downloads/PDFs/business/COVID19-Reopen-Guidance.pdf
- CDC, Cleaning and Disinfecting Your Facility, https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html
- ASHRAE, Position Document on Infectious Aerosols, https://www.ashrae.org/file%20library/about/position%20documents/pd_infectiousaerosols_2020.pdf
- NPAIHB, Food Service Standard and Inspection Form