As restaurants and food operations reopen during the COVID-19 pandemic, owners and managers must put controls in place to limit the risk of infection for both employees and customers.

Establishments are encouraged to follow state and federal guidelines, including those published by OSHA, the Occupational Safety and Health Administration. OSHA developed a COVID-19 planning guidance based on traditional infection prevention and industrial hygiene practices. OSHA is tasked with investigating workplaces where there is the potential for SARS-Cov-2 infection.

As part of the OSHA guidance for food retail establishments, titled "Retail Workers and Employers in Critical and High Customer-Volume Environments", employers have been asked to assess their operation and implement controls to reduce the risk of infection. While there is no requirement for a written assessment, there are many advantages to having a documented assessment.

COVID-19 Risk Assessment Form for OSHA Guidelines (2020-05)

One advantage is that it allows the manager or owner to visualize what procedures need to be in place. This is especially beneficial for operations with multiple operating units where it may be easier to miss some element within a given operation. Conducting an assessment will show due diligence regarding liability in the event of an infection outbreak centered at the establishment.

It is important to remember that each operation is different, thus the types of controls used will vary depending on the specifics of a given operation. There are physical controls, or what OSHA calls Engineered Controls, that are physical elements such as plexiglass shields between the customer and the person taking the order. Another category of controls is termed Administrative and these are procedural in nature, for example, limiting the number of people in a food establishment. Finally, there are personal protective equipment, or PPE controls, which includes the use of face coverings and gloves.

It is best to have written procedures that provide more consistent application of the procedure over time and allow for more standardized training of employees. All employees should be trained, and this training should be documented.

OSHA appears to be getting more involved in workplace-related COVID-19 cases. The agency has recently announced that operations should determine whether employee COVID-19 illnesses are work-related and thus recordable when employees come down with infection. Having a solid plan for preventing infection and then implementing that plan with documentation will go a long way to making a safer workplace without the need for OSHA enforcement.

Webinar

Preparing a COVID-19 Prevention Plan for Retail Food Establishments This webinar will provide information on preparing a written COVID-19 Prevention Plan. Learn how to conduct a risk assessment with appropriate controls that minimize the risk of SARS-CoV-2 infection for customers and employees to complete the prevention plan.

Reference

- FDA. Best Practices for Retail Food Stores, Restaurants, and Food Pick-Up/Delivery Services During the COVID-19 Pandemic.
- OSHA. Retail Workers and Employers in Critical and High Customer-Volume Environments.