



Missoula City-County Health Department

ENVIRONMENTAL HEALTH

301 West Alder Street | Missoula MT 59802-4123
www.missoulacounty.us/HealthDept

Phone | 406.258.4755
Fax | 406.258.4781

DATE: 4/29/2020
TO: Missoula County Food and Drink Establishments
FROM: Jeanna Miller, RS, MPH
Environmental Health Manager
RE: Limited Re-opening of restaurants and bars

Well done, Missoula!

We have sacrificed our “normal” to flatten the curve. As businesses begin to open to the public, we are entering the next stage in protecting ourselves and our community. We are your partners in public health and food safety, and we want to continue to be your local trusted resource in these unprecedented times.

This guidance document outlines:

- **minimum requirements** that must be in place before you resume on-premise dining on May 4 or later, and that must be adhered to throughout Phase 1,
- a list of **recommendations** that we hope you also incorporate into your business and service model to further protect the community, and
- some **ideas and strategies** you could consider when making your individualized plan.

These requirements and recommendations are straight from the Governor’s 4-22-20 directive and the Missoula City-County Health Officer Order issued on 4-24-20. From the outset, it is important to know that “open for business” is not “business as usual”. We all have a social responsibility to do the best we can for our neighbors. Your business is unique, so there is not a one-size-fits-all plan. Each operator will have to figure out how these concepts and recommendations will look in your establishment.

I will be hosting a Facebook live session on Thursday at 4:00 p.m. to talk about these requirements in more detail. I will address re-opening questions or concerns that we have gotten from operators and give some examples that will give context to this guidance. This live broadcast will also be recorded, so if you aren’t able to join in real time, you can still view it. We will not be able to answer questions during the live session, but you will have the ability to type questions into the comments box. We will do our best to work through them after the session and get back to you.

MINIMUM REQUIREMENTS

1. Reduce maximum occupancy of your seating area to 50% of normal operating capacity.

- The first step is determining what your normal operating capacity was (pre-closure), and then reduce that by half.
- This will mean removing chairs or tables, or otherwise marking them or roping them off to make it clear to staff and customers that they cannot sit there.
- Know your new, temporary maximum capacity. It's a good idea to post the number in conspicuous locations, making staff and customers aware of the new limit. Devise a plan so you do not exceed your maximum capacity whenever you are open.
- Outdoor seating areas may be taken into consideration when determining your normal (pre-closure) operating capacity.
 - If you have outdoor seating, configure the seats so that your customers will be at least 6' away from people passing by in the adjacent sidewalk or parking lot areas.
 - If you are considering adding new outdoor seating areas, or expanding your existing outdoor seating area, you still must get approval from all necessary agencies, for example the parking commission or the Department of Revenue.

2. Provide 6' distance between customers and groups of customers, including those sitting at booths, in waiting areas, and in outdoor spaces.

In addition to reducing your capacity to 50%, you have to provide 6' between customers. Note that even if your establishment has available space to spread your tables and chairs, you are still required to limit your total occupancy.

- You must ensure your customers, or groups of customers, are at least 6' apart. **This includes customers sitting in back-to-back booth seats.** The governor's directive allows customers to sit directly next to others in back to back seating, HOWEVER, the local Health Officer Order is more restrictive, requiring all customers or groups of customers to be 6' apart, regardless of the type of seat they are in or what direction they are facing.
- The distance required is between seated customers in your establishments, not measured between table edges or seat-to-seat.
- The physical distance must be planned for and maintained in all public areas of your establishment, not just the dining area.

3. Table seating capacity is limited to six (6) people.

- Any group of diners/drinkers must be limited to no more than six people per table. In

other words, the only customers that can be closer than 6' to each other are those in their group, and groups are limited to a maximum of six people.

- To re-iterate the requirement in #2 above, each group of six people or fewer must maintain a distance of at least 6' from all other customers or groups.
- 4. Bar and counter service and seating is prohibited.**
 - You must remove, or somehow disallow or disable, seats at a bar or counter.
 - Standing or ordering at a bar or counter is prohibited.
 - In facilities with bars, drinks and food that will be consumed on-premise must be served to customers at the table.
 - 5. Self-service buffets are prohibited.**
 - This includes salad bars, meal buffets, olive bars, self-serve condiments, create-your-own dessert areas, etc.
 - 6. Drink re-fills (same cup) are not allowed.**
 - 7. Available gambling machines must be spaced at least 7' on center. You may space them out or disable/power-off some of the machines to achieve this spacing minimum.**
 - 8. Your establishment must be completely closed, with all customers out, by 11:30 p.m., or by an earlier time required by license type (breweries/distilleries).**
 - 9. You must develop and implement an enhanced cleaning and sanitizing plan, and all employees must be trained in COVID-19 specific cleaning practices.**
 - Surfaces must be cleaned and disinfected between customers.
 - Before you reopen, identify all the common surfaces in your business. Common surfaces include, but aren't limited to menus, table and counter tops, chairs, booths, highchairs, restroom surfaces, and all door handles.
 - It is recommended that you remove all table items, like condiments, menus, napkins, and décor, but if you do not remove these items, they must be cleaned and sanitized between customers.
 - All refillable or reusable containers (growlers, mugs, etc) must be cleaned before being refilled.
 - Gambling machines must be cleaned and disinfected between users.
 - You must ensure that all employees know about and can implement the enhanced cleaning and sanitizing plan.
 - For non-food contact surfaces, you must use an approved sanitizer at an effective concentration. The CDC has a list of disinfectants that will kill COVID-19. Pay attention to labels, manufacturer instructions and warnings.
 - For all food contact surfaces, follow the Food Code requirements for cleaning and sanitizing.

10. You must conduct pre-shift health assessments of your employees, and sick employees must be excluded from the facility.

The employee health assessments are a way to screen employees for symptoms associated with COVID-19. While this is a protective measure that might prevent virus spread from symptomatic employees, remember that an employee might have the disease but not show signs of it. This is why it is extremely important to follow all other protective measures. Current CDC guidance indicates that people infected with COVID-19 may have the following symptoms:

- fever over 100.4° Fahrenheit
- shortness of breath or difficulty breathing
- chills or repeated shaking with chills
- new loss of taste or smell
- diarrhea
- cough
- sore throat
- unexplained muscle pain
- vomiting

Employees experiencing any of the above symptoms must be excluded from work until they have been symptom-free for at least three days. In addition, any employees with symptoms should be tested for COVID-19. Testing centers in Missoula have recently expanded the criteria for testing eligibility. There currently nine testing sites available in Missoula County, and the contact information is available on our website. If you are viewing this document online, Please click [HERE](#) for the testing site contact information.

Additional considerations related to employee health checks:

- If you choose to record the information gathered as part of employee health assessments, be aware that personal health information should be kept confidential. Consider using individual slips filled out by employees and submitted to only a shift manager, creating a health screening space that has privacy, or use of unique/confidential identifiers (rather than employee name) if you incorporate some sort of shared reporting form.
- In addition to this COVID-19 specific health assessment, **managers and employees must comply with the employee health and sick worker exclusion rules in Section 2-201 of the 2013 FDA Food Code.**

RECOMMENDATIONS

Now that you know what you **must** do in order to open your bar or restaurant, here are a list of things that you **should** consider doing or implementing to add additional layers of protection during this first phase of operation. Again, items 1-10 above are **required** by the Governor's directive or the local Health Officer Order. The items below are **recommended** by the Governor's directives, by MCCHD, or by the CDC.

- Continue to promote and encourage to-go, curbside pick-up, and delivery. This is still the most protective way to provide food to your customers.
- Cloth face coverings are strongly recommended for staff and customers. We realize that people are there to eat and drink and that you can't do that with cloth over your mouth. Cloth face coverings should be worn to the extent possible.
 - NOTE: A cloth face covering is not a surgical or N-95 mask, those are being reserved for health care workers. Please visit the Department website for a description of the proper way to wear and launder face coverings.
- Consider expanding sick leave allowances and benefits for staff. Reduce the negative impact (financially, and otherwise) that missing work has for employees.
- Provide or require employee training in COVID-19 specific issues, like ways the virus is transmitted. When people understand that underlying reasons behind policies and rules, they are much more likely to follow them. We are compiling a list of training resources that you may find useful. The resource list will be available soon on our website.
- Set up additional, convenient, hand wash stations for staff. Staff must wash hands frequently, especially after touching used dishes or glassware, etc. This is a Food Code requirement, but extra emphasis on handwashing is critical.
- Eliminate the "seat yourself" model, even in quick-service and fast-casual establishments. Ensure that customers do not sit at a table that employees haven't yet cleaned and disinfected.
- Cups, straws, and lids for fill-your-own drink stations should be kept behind the counter.
- Place hand sanitizer in locations that are not only available to staff, but also patrons. Hand sanitizer is only effective if it is 60% or more alcohol. We recognize that hand sanitizer is hard to find. Remember that sanitizer is not a substitute for handwashing by employees.
- Keep self-service cups, straws and lids behind a counter to hand out to customers.
- Seek out industry best-practices.
- Make all reasonable accommodations for vulnerable employees.

ADJUSTMENTS OR STRATEGIES TO CONSIDER

Every establishment is unique, and that meeting the requirements and incorporating the recommendations will look different from one place to the next. The following list briefly describes some of the ideas that we have seen in our community or heard about from various operators.

- Encourage opening on a reservation-only model. This will reduce waiting area crowding and reduce the complication of eliminating crowding among wait-listed patrons.
- Manage the movement of patrons through your establishment by designating one entry door, and one exit door (create one-way flow). This will maximize physical distance at points of ingress/egress.
- Eliminate as many common surfaces as possible. This may include: posting one large

menu in plain view so that ordering can happen without passing out individual menus; propping open some interior doors to eliminate the need to touch a handle; using an app or texting to let waiting customers know their table is ready (rather than passing out devices that light up/vibrate to waiting customers).

- If customers order or pay at a common window or counter, consider installing a physical barrier between the customer and the employee. You have probably seen examples of these barriers around your community. We understand that plexiglass is getting harder to find.
- Consider limiting your menu to fewer items, or simpler foods. Your staff will have a lot to manage, and any simplifications will be helpful. Also, a simpler menu will reduce time between ordering and eating/drinking. This may help you move customers through your limited seating more quickly and maximize your profits.
- Assign continual cleaning and sanitizing of surfaces to one (or a few) staff members. These staff may elect to wear protective gear (gloves) since they would be dipping their hands in a strong sanitizer solution and/or wiping with sanitizer almost constantly.
- Designate one employee to handle money (cash/card) transactions.
- Post signage that reminds staff and patrons of their obligation to maintain 6' separation.
- Limit music or entertainment. The idea is to ease in to expanded dining options, but still limit people's interactions with other groups and the amount of time they spend in a public space. For that reason, concerts and music/entertainment not associated with dining, or that would encourage people to stay longer than a meal should not be allowed in this limited re-opening phase. Musicians must maintain 6' min distance from patrons and staff.
- Consider limiting the number of drinks or the amount of time people can spend in bars to something that would be about the length of a normal meal.

We are committed to making Missoula County's re-opening phases both flexible and protective. Please tailor this guidance to fit your establishment. Again, this describes the requirements and recommendations for the first phase of a larger re-opening process. The duration of Phase 1 will be evaluated by the governor and our Health Officer and depends on case numbers and trends.

Call 258-4755 or email envhealth@missoulacounty.us if you have questions about what this might look like in your establishment, or if you would like to talk through your plan with a sanitarian. We will do our best to respond in a timely manner, knowing that May 4 is approaching quickly, and that we have hundreds of businesses navigating their what re-opening needs to look like for them.