

City of Chicago Unveils Reopening Guidelines, PPE Exchange Ahead of Transition to Phase 3

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Mayor Lori Lightfoot has released the City of Chicago's [industry guidelines](#) for reopening as the City prepares to transition to Phase 3 of the "Be Safe Chicago" plan. Under the City's plan, which established more strict requirements for progressing from phase to phase than the state-wide "Restore Illinois" plan, various industries will be permitted to reopen in a limited manner on June 3, 2020. City services, including park facilities west of Lake Shore Drive and libraries, will reopen on June 8, 2020. The City's guidelines are largely similar to the [statewide guidelines](#) announced by Governor J.B. Pritzker on May 24.

Concurrent with release of the guidelines, the City also has established the [Chicago PPE Market](#), an online platform that allows businesses and community and non-profit organizations to purchase personal protective equipment (PPE) directly from local suppliers.

Significantly, the City's guidelines require employers across all industries to report COVID-19 cases to the Chicago Department of Public Health when a facility "becomes aware of 2 or more cases possibly associated with an establishment over a 14 day period." It is unclear whether this requirement will apply only to cases involving employees of the facility, or to cases involving customers or employees' family members.

Additionally, all industries will be required to clean and disinfect facilities according to Centers for Disease Control and Prevention (CDC) guidelines if an employee tests positive for COVID-19.

This special report summarizes the industry-specific guidelines issued by the City for education and childcare, office and real estate, accommodation and tourism, parks and outdoor attractions, food service, retail, personal services, health and fitness, manufacturing, construction, transportation and warehousing, and healthcare.

Education and Childcare Guidelines

- Visual signage regarding hygiene, social distancing, and proper PPE should be posted throughout facilities.
- Health screenings for children should be required before classroom entry. Persons who display signs of illness or have a fever of 100.4 degrees or above must not be permitted on the premises.
- Parents and employees should be required to wear facial coverings at all times, and children should be required to wear facial coverings when outside the classroom.
- Staff should frequently disinfect facilities, including toys and other objects.
- Children should be grouped into stable cohorts with two permanent staff members assigned to each group. Group size should be limited to 10 or fewer children by age cohort in accordance with state licensing requirements.
- Doors and windows should remain open to increase ventilation, where appropriate.
- If possible, staff should change into different clothing and shoes on-site. Facilities should ensure the clothing kept on-site is laundered regularly.
- Before opening for care in Phases 3 and 4, all childcare centers must submit a reopening plan to the Department of Child and Family Services (DCFS).
- For the first four weeks of operation, childcare centers must review their reopening plan with a DCFS Licensing Representative, have at least 50 square feet per child two years and older, and add four square feet of minimum sleeping space per child for infants and toddlers to ensure cribs and cots can be placed six feet apart.
- Childcare homes must submit a reopening plan to DCFS before reopening. Licensed exempt childcare homes must return to their pre-COVID-19 group limits.

Office and Real Estate Guidelines

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Industries

- Workspaces should be separated by impermeable barriers to enhance safety, where possible.
- Individuals are required to wear face coverings at all times in common areas or where six feet of social distancing is not possible.
- Workspaces should be reconfigured to maintain appropriate distancing.
- Visual signage regarding hygiene, social distancing, and PPE should be posted throughout facilities.
- Small, high-traffic common areas should be closed to avoid large gatherings.
- Sanitation stations should be readily available for employee and customer use. Residential buildings should provide hand sanitizers and tissues in common areas. Commercial buildings should provide hand sanitizer at a minimum of one location in the main lobby of the building. Employers in commercial buildings must provide hand sanitizer at a minimum of one location at the main entry of the tenant suite.
- Employers should encourage adoption of flexible working models, including work from home strategies, phased return to work plans, and phased workdays or workweeks. Commercial buildings should limit the number of employees returning to work and vary start and stop times to promote social distancing, if possible.
- Commercial buildings should limit capacity to 25% for all indoor spaces, including tenant spaces. Gatherings of occupants in common areas (including cafeterias, meeting rooms, tenant lounges, and other gathering points) should be limited to no more than 10 people, and all gathering areas where social distancing cannot be achieved should be closed.
- Residential buildings should limit gatherings of residents in common areas and amenity spaces to no more than 10 people, and limit capacity in common areas to no more than 25% for indoor spaces or activities with occupancy restrictions.
- In residential buildings, employers must provide PPE to staff, including masks, gloves, booties, and safety glasses, as appropriate.
- Residential buildings should limit interpersonal interactions at access and choke points by closing amenities or reopening them with adjusted hours and occupancy limits, promoting contactless delivery, restricting or scheduling times when packages can be picked up by residents, and optimizing elevator occupancy.
- Residential buildings should provide virtual and self-guided tours of units, and in-person tours should be limited to amenities and model or vacant units only. Move-in processes that support social distancing should be established.

Accommodation and Tourism Guidelines

- Six-foot indicators should be placed throughout common areas to promote physical distancing.
- Face coverings are required in all common areas.
- Daily housekeeping during a customer's stay should be provided only upon request to limit staff time in guest rooms.
- Restaurants should be closed for in-house dining and offer only pickup or room service consistent with current state regulations.
- Visual signage regarding hygiene, social distancing, and proper PPE should be visible throughout facilities.
- Guests should be encouraged to use mobile keys and check-ins/check-outs.
- High-touch areas (such as elevators) should be frequently cleaned by employees.
- Gatherings in indoor common areas (such as lobbies) should be limited to no more than 25% capacity, and gatherings of employees or guests should be limited to no more than 10 individuals.
- Screening policies and protocols should be established for employees and contractors.
- Rooms should be removed from service to undergo a deep cleaning protocol if an occupant tests positive for COVID-19.
- Non-single-use items (such as decorative pillows, pens, magazines, glasses, mini-bars, coffee makers, and coffee cups) should be removed from guest rooms and guest areas in public spaces.

Parks and Outdoor Attractions Guidelines

- Runners, joggers, bikers, and walkers should be encouraged to maintain greater than six feet of distancing when exercising.
- Outdoor activities should be limited to non-contact sports in small groups only.
- Playgrounds and pools should be closed.
- Social groups should maintain physical distancing in open spaces.
- Participants and attendees of parks and outdoor attractions are required to wear face coverings at all times.
- Visual signage regarding social distancing and proper PPE should be posted throughout the parks.
- Outdoor activities should be limited to non-contact sports only, and other courts and fields (including basketball courts) should be closed.
- Gatherings in large public and private outdoor spaces should be limited to no more than 10 individuals by dedicated staff. Indoor areas (such as restroom facilities, field houses, and exhibit spaces) should be limited to 25% capacity at all times, including during inclement weather, unless barring individuals from shelter would create a safety hazard.

Food Service Guidelines

- Contactless pickup should be made available and contactless payment should be encouraged.
- Outdoor dining will be permitted with standard social distancing requirements. The guidelines

indicate that the City will be establishing an application process for restaurants and bars seeking to provide outdoor dining. Dining areas considered “outdoors” will include rooftops, rooms with retractable roofs, and indoor spaces where 50% or more of a wall can be removed by opening windows, doors, or panels, provided that dining tables are within eight feet from such openings.

- Visual signage regarding hygiene, social distancing, and proper PPE should be posted throughout facilities.
- Employees are required to wear face coverings at all times. Employers should provide gloves to follow standard food handling guidelines, and ensure dishwashers have access to equipment (including face coverings, protective glasses, and face shields).
- Guests are required to wear face coverings when they are not seated.
- Employees and diners should be encouraged to maintain six feet of social distancing. To ensure social distancing, tables should be spaced six feet apart or decommissioned, or physical barriers (such as Plexiglass) should be installed between tables if they cannot be moved. Impermeable barriers should also be used in areas such as counters, service tables, and registers where six feet of social distancing is not possible.
- Employees should disinfect facilities frequently. Highly touched front-of-house areas should be cleaned every 30 minutes.
- Employers should ensure that hand sanitizer or hand washing facilities are readily available for both customer and employee use.
- Gatherings in waiting rooms and lounge areas should be limited to no more than 10 individuals, and diners should be limited to no more than six people per table.
- Employers should provide health and safety training, including ServSafe Manager, Delivery and Takeout Training, Food Handler Training, and NRA Reopening Training.
- Disposable table items (including menus, containers, and condiments) should be provided where possible, and non-disposable table items (including menus, containers, tables, and chairs) should be cleaned and sanitized after each use. Fixed menu boards or digital menus should be used if practical. Use of self-serve food and drink stations should be discontinued.
- Bar and counter seating should be eliminated unless its primary purpose is serving food (*e.g.*, sushi bars and diner counters). All patrons must be seated and adhere to six feet of social distancing.
- If practical, employers should consider workplace modifications (including floor marking, staggered workstations, and orienting workstations) to allow workers on prep lines to face away from each other to promote social distancing.
- If practical, employers should also provide separate restroom facilities for workers and customers/third parties.
- Patrons should be encouraged to remain outdoors or in their vehicles while waiting to be seated.

Retail Guidelines

- Customers should be encouraged to maintain social distancing while in store. Six-foot indicators should be placed throughout stores to ensure customers maintain physical distancing.
- Impermeable barriers may be used to maintain separation between employees and shoppers.
- Employees should disinfect stores frequently. Fitting rooms should be sanitized after each use, public restrooms should be sanitized hourly, and display cases and checkout counters should be disinfected at least once every two hours. High-touch areas (including carts, baskets, and self-serve checkout equipment) should be disinfected between customers.
- Sanitizing products should be readily available for use.
- Customers should be encouraged to use contactless payment.
- Customer and employees are required to wear facial coverings at all times.
- Capacity in all indoor spaces (excluding staff) should be limited to 25% for non-essential retail businesses and 50% for essential retail businesses. This recommendation differs from the statewide recommendation, which provides only that all retail businesses should limit capacity to 50%, or five customers per 1,000 square feet.
- Gatherings of employees and customers in choke points (including cafeterias, meeting rooms, and fitting rooms) should be limited to no more than 10 individuals.
- Employers should provide sanitizing products for employee and customer use. Employees should be allowed at least one hygiene break per shift, which can coincide with any other break granted or scheduled during the shift, not including a scheduled lunch.
- Employees should be prohibited from handling reusable shopping bags.
- Store-issued clothing items that are kept in the store should be cleaned after each shift. If the clothing items are kept at home, employees should be encouraged to clean them after each shift.
- Employees should self-screen to ensure they have no COVID-19 symptoms before entering an establishment, and employees should not report to or be allowed to remain at work if exhibiting symptoms or reporting that they feel ill.
- Self-serve and communal food should be decommissioned, but hot or cold food bars can continue to offer packaged servings. Samples are allowed only if they are individually packaged, fully enclosed, and handed out by an employee. Food seating areas should be decommissioned.
- If only one bathroom exists on the premises, it should be reserved for employee use only. If more than one bathroom exists on the premises, one should be reserved for employee use only.
- If practical, curbside delivery, contactless payment, and self-serve checkout should be encouraged.
- If practical, full-service grocery stores should implement shopping hours for vulnerable populations at least once per week for one hour at the beginning of the day.

Personal Services Guidelines

- Businesses should ensure six feet of social distancing between individuals and in choke points. Impermeable barriers should be provided, or every other workstation should be decommissioned, if six feet of social distancing is not possible.
- Capacity should be limited to 25%, excluding staff.
- Gatherings in choke points (including break rooms and check-out areas) should be limited to no more than 10 individuals.
- Employees and customers must wear face coverings in any indoor and outdoor common spaces. Employers should provide face coverings for employees. Machine-washable aprons and capes should be cleaned after every use, and the use of disposable capes and aprons should be encouraged.
- Services that require removal of face coverings (like facials and shaves) should be decommissioned. If practical, face shields, goggles, and/or gloves should also be used by employees in close contact to guests providing make-up applications, aesthetician services, and nail services.
- Businesses should ensure hygienic interactions by providing regular training to employees and ample hand sanitizer for employees and guests. Employees should wash their hands before and after every service, or if service is interrupted. Hands should be sanitized before and after touching samples, and products should be sanitized after each customer. Use of product samples and testers should be eliminated.
- Screening measures for employees and customers should be implemented.
- Daily cleaning standards for spaces and high-touch items should be established. High-touch areas (including workstations, foot spas, massage tables, dryers, stylist chairs, and nail chairs/spas) should be disinfected/sanitized with an EPA-registered disinfectant after each customer. High-touch surfaces (such as doors, handles, and reception stations) should be disinfected at least once every two hours. All equipment should be disinfected and sanitized after each client.
- Visual guidance on hygiene standards and entry requirements should be provided.

Health and Fitness Guidelines

- Adequate space should be provided to ensure six feet of physical distancing.
- Indoor activities should be restricted to 1:1 individual training only. Total indoor capacity should be limited to 25%. Lockers rooms, sauna and steam rooms, childcare accommodations, and lounges should be closed to prevent gatherings.
- Outdoor fitness classes should be restricted to no more than 10 individuals.
- Face coverings must be worn by all trainers and participants in any outdoor and indoor common spaces and during physical activity.
- Regular sanitization of hands and high-touch areas should be ensured. Sanitization products should be provided for customer use, and employees should be required to wash hands before and after every 1:1 training or other close contact.
- Water fountains should be decommissioned, unless used to fill water bottles.
- Employee health screening protocols and daily cleaning standards should be established. Facilities should ensure that participants come to the facility dressed in exercise clothes due to closure of locker rooms. Patrons should be required to self-sanitize used equipment whenever possible with wipes provided by the facility, and nightly deep cleaning should be conducted in addition to frequent daily cleaning.
- Visual guidance on hygiene standards and entry requirements should be provided.
- Indoor cardio equipment should be rearranged or decommissioned to allow six feet of social distancing for 1:1 training, and only non-contact sports (such as swimming or tennis) with a 1:1 trainer should be allowed.

Manufacturing Guidelines

- Employees should complete health screenings before entering the facility.
- Sanitation and handwashing stations should be readily available for employee use. Employers should provide wall-mounted hand sanitizer at all entrances and restrooms.
- Workstations should be separated by six feet of distance and impermeable barriers, where possible.
- Six-foot indicators should be placed throughout the manufacturing floor, where possible.
- All employees should wear appropriate PPE, including face coverings and eyewear, where possible. Employees doing health checks must wear face shields over face coverings.
- Visual signage regarding hygiene, social distancing, and PPE should be provided.
- Gatherings in cafeterias, meeting rooms, and other gathering points should be limited to no more than 10 individuals.
- Where possible, employees should work remotely and stagger shifts and employee breaks. Employers should adjust operating schedules to match fluctuating demand and supply. Employers should also encourage use of work zones, where employees must stay in their zones.
- Visitors should be allowed inside facilities only to provide essential services, deliveries, and pickups.
- If possible, facilities should equip frequently used doors with no-hands opening and closing, and should install no-touch sinks and toilets. Employees should not be allowed to drink directly from water fountains.
- Where possible, employees should work remotely. Employers should limit shift overlap and/or implement staggered reporting and ending times.

Construction Guidelines

- To ensure social distancing is maintained, break areas, hallways, hoists, and stairways should be closed, or markers should be installed to direct movement.
- Employees should be assigned to designated work areas and physical contact between employees should be discouraged. Shared use of vehicles should also be discouraged.
- Shifts should be optimized to decrease the number of workers in the same space at the same time. To the extent possible, work should be conducted outside of hours where the public is present.
- Gatherings on the site should be limited to no more than 10 individuals.
- Face coverings should be worn in any outdoor and indoor common spaces, unless they are a safety hazard on a worksite.
- Hygiene standards should be established, including access to handwashing facilities. Employers should supply employees with their own alcohol-based hand rubs and/or disposable disinfectant wipes to carry about the jobsite.
- Subcontractors should be required to complete training and safety certification that includes information on COVID-19 topics.
- Facilities should clean sites and heavy transit areas thoroughly between every shift, at a minimum. Facilities should also clean high-touch surfaces (including shared tools, machines, vehicles, handrails, and portable toilets) every four hours, and/or after any change in personnel handling.
- In the event of a positive COVID-19 case, facilities should wait 24 hours before cleaning and disinfecting exposed areas to minimize potential for exposure to other employees, in line with CDC guidelines.

Transportation and Warehousing Guidelines

- Facilities should maintain greater than six feet of social distancing at all times, where possible. Gatherings of employees in cafeterias, meeting rooms, and other gathering points should be limited to no more than 10 people.
- Face coverings are required in any outdoor and indoor common spaces, but may not be required if wearing face coverings inhibits clear communication or vision, or cannot be done safely.
- Facilities should regularly clean the site at least once per shift.
- In the event of a positive COVID-19 case, facilities should wait 24 hours before cleaning and disinfecting exposed areas to minimize potential for exposure to other employees, in line with CDC guidelines.
- Facilities should frequently disinfect heavy transit areas and high-touch surfaces (including shared tools, machines, vehicles, handrails, and portable toilets) and ensure proper cleaning of shared vehicles.
- Employers should establish protocols for different sites based on space constraints and ability to restrict access to the site.
- When possible, employers should adjust work scheduling, hours, and shifts to reduce density at the work site, minimize contact across employees, and prevent congestion at entry points.

Healthcare Guidelines

- Six-foot indicators should be placed throughout facilities to ensure that patients maintain physical distancing.
- Employers are encouraged to provide sanitization supplies throughout facilities.
- Patients and staff are required to wear facial coverings at all times.
- Visual signage regarding hygiene, social distancing, and proper PPE should be posted throughout the facility.
- In dialysis centers, dialysis chairs should be placed at least six feet apart.
- Barriers are suggested at the front desk of mental health facilities.
- Gatherings of employees and the public in cafeterias, meeting rooms, and other gathering points should be limited to no more than 10 people.
- In line with Illinois Department of Public Health requirements, patients should be tested for COVID-19 72 hours prior to elective surgery and self-quarantine until the day of surgery. Facilities should also ensure that a patient's temperature is less than 100.4 degrees prior to surgery.
- In physician's offices, no sharing of food or drink should be allowed, and no food or drink should be allowed in clinical areas.
- In nursing homes, installation of handwashing stations, eye wash stations, and sanitization stations is encouraged.
- Visitors should be prohibited, unless necessary for an aspect of patient care or as a support for a patient with a disability. If visitors are allowed, they should be pre-screened for symptoms of COVID-19.
- If clinically appropriate, aerosolizing equipment (including air hand dryers) should be disabled.
- If available, shift-based scheduling and staggered break times should be utilized, and telehealth operations should be used as much as possible.
- Non-essential items (such as magazines and toys) should be removed from waiting rooms.

Reopening orders contain extensive requirements creating compliance issues that can vary significantly depending on the specific state or local jurisdiction. Jackson Lewis attorneys are closely monitoring updates and changes to legal requirements and guidance and are available to help employers weed through the complexities involved with [state-specific or multistate-compliant plans](#).

If you have questions or need assistance, please reach out to the Jackson Lewis attorney with whom you regularly work, or any member of our [COVID-19 team](#).

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