

Personal Services FAQ - May 2020

Q. If a salon owner has independent contractors who are responsible for themselves, who would the owner be fined if the independent doesn't comply?

A. OSHA's first and primary goal will be education and enforcement. If an independent contractor is violating the guidance, they would be the responsible party. Owners should inform the contractors of their responsibilities and encourage compliance.

Q. What are best practices for massage therapists and their clients?

A. The personal services guidance applies to massage therapists. The American massage therapy association (amta) has a guidance page with links to applicable CDC and ISPA information:

<https://www.amtamassage.org/about/news/covid-19-resources-for-massage-therapists/>

Q. Does client screening include asking if the client has traveled/would travel outside of a 50 mile radius to attend the appointment?

A. You are not required to ask this question. (The State's guidance at this point simply discourages non-essential travel and doesn't set a particular mileage limit on travel.)

Q. If the client in the salon is a child, is a parent allowed to come in and wait with them?

A. Yes, but if the child is old enough and comfortable with the idea, you may want to encourage the parent to wait nearby. *[SEEKING CONFIRMATION.]*

Q. Are the pre appointment client screening questions needed to be asked at the time of an appointment request and then again at the time of the appointment?

A. The most important time to ask the screening questions would be the day of or immediately prior to the appointment. You may want to consider a practice of requiring a day-of-appointment confirmation call in which you could ask the screening questions.

Q. What is the need to change clothes/smock based on? Is there any scientific basis for this requirement?

A. There is still a lot unknown about the virus. It is possible that a smock could transmit the virus.

Q. Do smocks need to be long sleeve, i.e., is an apron not acceptable?

A. OHA has stated that aprons are acceptable. *[TRYING TO CONFIRM THIS.]*

Q. How often does a provider need to change (or launder) their face covering?

A. ???

Q. Would these requirement apply to a personal trainer in a gym? I know we are waiting for gym guidelines later this week, but wondering if independent contractors/ personal trainers would also need to adhere to these personal services guidelines, in addition?

A. Please see forthcoming guidance for gyms/personal trainers. *[I WOULD GUESS THAT THE GYM GUIDANCE WILL DIRECT TRAINERS TO NOT HAVE THE KIND OF*

PERSONAL/CLOSE CONTACT THAT CREATES THE NEED FOR THE EXTRA LEVELS OF PRECAUTION NEEDED IN PERSONAL SERVICES.]

Q. What is the basis for requiring EPA-registered cleaners? Where is the science for this? Are Dr's and PTs and Chiropractors and Dentists doing this too?

A. Medical facilities do have clear guidance on the types of cleaners and disinfectants to use. You will find that many cleaners are EPA-registered. There are 410 entries on the list including common products such as "Comet Disinfecting Bathroom Cleaner," "Fantastik Multi-Surface Disinfectant Degreaser," "Clorox MultiSurface Cleaner+Bleach," and many others. See: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

Q. If we have a linen closet specifically dedicated for sheets and towels only do we still need to put all of that into an airtight container?

A. A dedicated linen closet is sufficient. You may want to consider putting the linens in a trash bag or other airtight container when transporting them from the laundry to the closet.

Q. Do personal services include tattoo parlors and piercings?

A. Yes.

Q. For pedicure stations; are we allowed to put a glass or plastic separator between our pedicure stations as they are not and cannot be 6 feet apart?

A. No. If they are too close and not movable, consider using every other station. *[CHECKING ON THIS, BUT THIS IS THE ANSWER THAT HAS BEEN GIVEN FOR SIMILAR QUESTIONS IN THE CONTEXT OF RESTAURANTS.]*

Q. Can we offer clients drinks?

A. No. The guidance requires Providers to:

Remove all unnecessary items such as magazines, newspapers, service menus, and any other unnecessary items such as paper products, snacks, and beverages

Q. Do the salons have to documents and maintain records that they asked the client screening questions?

A. No, the guidance only requires that you keep for 60 days the name of the client, the date/time of their service, and the name of the provider. (Documenting the client screening questions may be a useful step for limiting your liability.)

Q. If clients see two separate stylists for two separate services do they need to come on different days?

A. No. To the extent possible, the rule of one provider for each client should be maintained. However, if the client is seeking multiple services that are only available from multiple providers, it is compliant to limit the interaction to one provider per service performed.

Q. In a spa environment, clients may have multiple services in one day. Is that a problem?

A. No. See above.

Q. I am experiencing estheticians and massage therapists that are afraid to come back to work as they still do not feel safe. What are our options? Can we delay opening?

A. Absolutely, you can remain closed. Nothing in this guidance requires providers to open. The Oregon Employment Department does provide some guidance for cases in which a business owner chooses to re-open and an employee is still reluctant to return to work:

https://www.oregon.gov/employ/Documents/Employer_Resuming_Operations-FAQs.pdf

Q. Can a stylist have more than one client at one time?

A. Possibly, but it may be challenging to do so. A provider would have to wear a different smock for each customer (and, of course, different equipment/tools) and thoroughly wash their hands each time they moved between customers.

Q. If we have a partition between the provider and the customer do we need to have a smock and a face covering?

A. A hard screen could take the place of a face shield, but would not eliminate the need for a smock or face covering. (A provider should be wearing a face covering essentially at all times.)

Q. As a nail tech are we required to wear gloves?

A. No. To the extent possible, providers should, but are not required to wear gloves.

Q. Why can you go to a store with a large number of people, but have to limit personal services to only one client at a time?

A. The risk in providing personal services, due to the proximity and the length of time involved, has a much higher risk of disease transmission.

Q. With regards to wax pots, can we empty the wax from before the closure disinfect and then refill and keep it closed when not in use?

A. Yes, if it is being refilled with new wax. Note that wax should be applied with single use applicators and disposed of in a well sealing trash can. *[CHECKING WITH OHA: IS THERE REALLY SUCH A THING AS AN AIR TIGHT TRASH CAN?]*

Q. I understood State Guidelines to require groups of 10 in public places stay 6' apart from other groups, not individuals in the groups of 10. Can you clarify? And will that extend now to groups of 25?

A. Unrelated individuals should be maintaining 6' physical distance in these kinds of situations. Yes, the maximum gathering size is increased to 25 in Phase 1.

Q. If members from the same household come in for a pedicure, are they allowed to sit next to each other since people in the same household are considered one person?

A. Yes.

Q. What are the regulations for us in a pool? i.e., lifeguard training, water fitness classes, and obviously swim lessons.

A. Swimming pools are currently closed and are not planned to be re-opened in Phase 1.

Q. Can a client bring with them their own nail file?

A. ????

Q. Do businesses need to pay attention to the 25 maximum gathering size?

A. In general, no. The maximum occupancy of a business is based on the ability to maintain social distance. A business should NOT hold an event on-site or off that includes more than 25 people.

Q. Can side by side massages be performed at the same time?

A. Probably not. If both recipients of the massage are in a related party, they could be side-by-side, but it would be very difficult for the providers to maintain social distance from each other.

Q. If you are washing your hands regularly why the need for gloves? Do stylists need to wear gloves?

A. Gloves are an extra precaution. They are not required.

Q. I am a hairdresser, after color and cut services, my client's hair is usually wet. Am I able to use blow drier and styling tools at this time?

A. ????. [NOT SURE I UNDERSTAND THIS QUESTION/WHAT THE PROBLEM WOULD BE.]

Q. Is there a scientific basis for believing the virus can linger on paperwork such that we have to take everything out of the room? Where can I read about such basis?

A. When writing the rules, there are times that decisions are made in order to keep the rules clear and easily understood. Rather than defining which non-essential items are acceptable and which are not, the rules require the removal of all non-essential items. In addition, the presence of reading materials can give customers the impression that they are invited to linger in the shop.

Q. Do you feel that by September we will be able to have an outdoor event over 100? Brides wants to know this!

A. We will be providing more information about what Phase 2 looks like as soon as we can.

Q. Do we need to provide coverings or a smock for clients to wear for a pedicure of manicure?

A. ????

Q. Can we wipe down chairs or do we have to cover them with plastic or fabric?

A. There is not a requirement that chairs be covered with plastic, but it is recommended if you have cloth or fabric chairs.

Q. Where can we find surgical masks of the type recommended for situations that require close contact (within 6 feet)?

A. N-95 masks are not necessary or recommended. Surgical masks that are rated ASTM 2 or 3 are adequate. [THESE ARE CHALLENGING TO SOURCE AT THIS TIME. BUSINESS OREGON IS WORKING ON SETTING UP A TOOL TO HELP BUSINESSES FIND THIS KIND OF PPE.]