

# COVID-19: State Reopening Status and Requirements<sup>1</sup>

May 5, 2020

In response to the threat of COVID-19 in the United States, governors across the nation issued orders closing businesses. These ranged from broad shelter-in-place orders, permitting only essential businesses to operate, to narrower orders closing only certain establishments thought to have a higher risk of spreading the virus. Some states have now begun to reopen their economies, and others have put forth plans outlining how they intend to do so. The below chart provides an overview of the status of the closing orders and reopening plans, as well as any social distancing, sanitation, and occupancy operating requirements imposed on businesses during the closures and reopenings.<sup>2</sup> The chart is a summary of the requirements; for full details, consult the relevant state orders and guidance.

If you have any questions concerning this memorandum, please reach out to your regular firm contact or the following authors

NEW YORK

**Jennifer Kennedy Park**  
+1 212 225 2357  
[jkpark@cgsh.com](mailto:jkpark@cgsh.com)

**Michael Albano**  
+1 212 225 2438  
[malbano@cgsh.com](mailto:malbano@cgsh.com)

<sup>1</sup> Thanks to Adrienne Dahrouge, Erik Bakke, Julie-Irene Nkodo, Hyatt Mustefa, Francesca Crooks, Suzannah Golick, and Allison McQueeney.

<sup>2</sup> Please also see Cleary's [Response to COVID-19: State Executive Orders](#) memo for information regarding state executive orders closing non-essential businesses, and Cleary's [Response to COVID-19: State Reopening Plans](#) memo for information regarding state reopening plans.

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State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
Alabama	<a href="#">Expired</a> April 30, 2020 at 5:00 pm	<a href="#">Yes</a> (e.g., may not knowingly allow patrons to congregate within 6 ft. of each other)	<a href="#">Yes</a> (e.g., take reasonable steps to comply with CDC and Alabama Dep't of Health sanitation guidelines)	<a href="#">Yes</a> (e.g., no more than 50% of max occupancy)	On <a href="#">April 30, 2020</a> at 5:00 pm, most businesses were permitted to resume subject to certain requirements. Entertainment venues, athletic facilities, close-contact service providers, on-premises restaurants, and bars remain closed until May 15, 2020 at 5:00 pm.	<a href="#">Yes</a> (e.g., take reasonable steps, where practicable, to maintain 6 ft. between employees and to facilitate remote work)	<a href="#">Yes</a> (e.g., take reasonable steps, where practicable, to regularly disinfect frequently used items and surfaces)	<a href="#">Yes</a> (e.g., take reasonable steps, where practicable, to avoid gatherings of 10 employees or more)	<a href="#">Retail Restaurants</a>
Alaska	<a href="#">Expired</a> April 21, 2020	<a href="#">Yes</a> (e.g., pro-actively promote social distance; take steps to enable employees to work from home)	No	No	Phase 1 of the <a href="#">reopening plan</a> went into effect on April 24, 2020 at 8:00 am, permitting businesses to resume subject to certain requirements. Bars and entertainment venues remain closed.	<a href="#">Yes</a> (e.g., cloth face covering for all employees; <a href="#">non-public facing businesses</a> should make efforts to maximize remote work)	<a href="#">Yes</a> (e.g., provide hand-washing capability or sanitizer)	<a href="#">Yes</a> (e.g., cap of the lesser of max 20 customers or 25% max occupancy for restaurants and retail)	<a href="#">Non-Essential Public Facing Businesses Generally Retail Businesses Restaurants Dine-In Services Personal Care Services Non-Essential Non-Public Facing Businesses</a>

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									<a href="#">Childcare and Day Camps</a> <a href="#">Fishing Charters</a> <a href="#">Gym and Fitness Centers</a> <a href="#">Lodging and Overnight Camping</a> <a href="#">Intrastate Travel and Outdoor Day Activity</a> <a href="#">Social, Religious and Other Gatherings</a>
Arizona	<a href="#">Yes</a> , until May 15, 2020 at 11:59 pm	<a href="#">Yes</a> (e.g., implement rules and procedures that promote social distancing of at least 6 ft.)	<a href="#">Yes</a> (must implement sanitation measures established by Dept. of Labor and Arizona Dept. of Health Services)	No	The details of a broader reopening plan have not yet been released, but under a stepped approach called <a href="#">Return Stronger</a> , on May 4, 2020, non-essential retail businesses can sell delivery or pickup merchandise, and on May 8, retail is expected to resume	N/A	N/A	N/A	<a href="#">Retail</a>

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					in-person operations with restrictions.				
Arkansas	<a href="#">No broad-based closure order</a> <sup>3</sup>	<a href="#">Yes</a> (e.g., mark off 6 ft. increments for lines)	<a href="#">Yes</a> (e.g., provide hand sanitizer)	<a href="#">Yes</a> (limit occupants such that people can easily maintain 6 ft. of distance)	No broad reopening plan has been announced.	N/A	N/A	N/A	<a href="#">Retail</a> <a href="#">Gyms</a> <a href="#">Camps</a> <a href="#">Restaurants</a> <a href="#">Cosmetology</a>
California	<a href="#">Yes</a> , until further notice	No (although the order relies on the <a href="#">CISA</a> guidelines to determine what businesses are permitted to operate, and the <a href="#">CISA</a> guidelines encourage remote work where possible)	No	No	On April 28, 2020, Governor Gavin Newsom announced <a href="#">California's Roadmap to Pandemic Resilience</a> setting forth a four stage plan to reopen the state. California is currently in Phase One of the plan, which encompasses the stay-at-home order. Further details about the subsequent reopening phases will be issued in the future.	N/A	N/A	N/A	<a href="#">General Businesses</a> <a href="#">Construction</a> <a href="#">Agriculture</a> <a href="#">Grocery Stores</a> <a href="#">Logistics</a>

<sup>3</sup> Arkansas's Executive Order 20-13 was not a broad order closing all non-essential businesses, but did provide for the closure of schools, bars, clubs, restaurants, gyms, and indoor entertainment venues. It has no expiration date.

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Colorado	<a href="#">Expired April 26, 2020</a>	<a href="#">Yes</a> (maintain 6 ft. from others)	<a href="#">Yes</a> (e.g., regularly clean high-touch surfaces)	No	On April 26, 2020, Governor Jared Polis announced <a href="#">Executive Order 2020-044: Safer at Home</a> which provides for the reopening of postsecondary institutions and phased reopenings of certain business operations. Retail and personal services can open on <a href="#">May 1, and non-critical offices can open on May 4.</a>	<a href="#">Yes</a> (e.g., discourage shared spaces)	<a href="#">Yes</a> (e.g., frequently sanitize all high-touch spaces)	No	N/A
Connecticut	<a href="#">Yes</a> , until May 20, 2020	<a href="#">Yes</a> (e.g., <a href="#">cloth face covering for all employees</a> and essential workers who are able to work from home should)	<a href="#">Yes</a> (e.g., provide hand sanitizer or soap and water)	No	On <a href="#">April 30, 2020</a> a phased plan to reopen the state was announced. Phase 1 is anticipated to begin on May 20 and will permit retail, personal services, and outdoor seating at restaurants to open. The full text and guidelines have not yet been issued.	N/A	N/A	N/A	N/A

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Delaware	<a href="#">Yes</a> , until May 15, 2020	<a href="#">Yes</a> (e.g., 6 ft. between employees; maximize telework)	<a href="#">Yes</a> (e.g., provide handwashing stations or soap and water)	No	No reopening plan has yet been published.	N/A	N/A	N/A	N/A
District of Columbia	<a href="#">Yes</a> , until May 15, 2020	<a href="#">Yes</a> (e.g., 6 ft. between employees)	<a href="#">Yes</a> (e.g., regularly clean high-touch surfaces)	No	Has not yet published a reopening plan.	N/A	N/A	N/A	N/A
Florida	<a href="#">Expired</a> April 30, 2020	No	No	No	On <a href="#">April 29, 2020</a> Florida announced its plan to reopen the state. Phase 1 of reopening began May 4 and will permit retail and restaurants to open in most counties.	<a href="#">Yes</a> (e.g., restaurant seating must have 6 ft. social distance between parties)	No	<a href="#">Yes</a> (e.g., retail and restaurants limit to below 25% capacity)	N/A
Georgia	<a href="#">Expired</a> April 30, 2020 (4.02.20.01)	<a href="#">Yes</a> (e.g., prohibiting handshakes and unneeded person-to-person contact; using telework for all possible)	<a href="#">Yes</a> (e.g., requiring hand washing or sanitation by workers within the business location) (4.02.20.01)	No	<a href="#">Restrictions began easing</a> on April 24, 2020, when certain businesses, including gyms, bowling alleys, and personal service providers (e.g., hair salons, massages, estheticians) were allowed to reopen with restrictions. On	<a href="#">Yes</a> (e.g., increasing physical space between workers' worksites to at least 6 ft.; using telework for all possible)	<a href="#">Yes</a> (e.g., thoroughly clean high contact areas) (4.23.20.02)	<a href="#">Yes</a> (e.g., limit retail businesses to 50% occupancy or 8 patrons per 1,000 sq. ft.) (4.23.20.02)	<a href="#">General Business Restaurants</a> ( <a href="#">4.27.20.01</a> )

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		workers) (4.02.20.01)			April 27, 2020, <a href="#">theaters and restaurants</a> were allowed reopen with certain restrictions.	workers) (4.23.20.02)			
Hawaii	<a href="#">Yes</a> , until May 31, 2020	<a href="#">Yes</a> (e.g., marking with signage 6 ft. spacing for employees and customers; persons may only travel to essential businesses if their function cannot be performed remotely)	<a href="#">Yes</a> (e.g., make hand sanitizer readily available)	<a href="#">Yes</a> (e.g., businesses determine the maximum number of customers)	No comprehensive reopening plan yet announced.	N/A	N/A	N/A	N/A
Idaho	<a href="#">Expired</a> April 30, 2020	<a href="#">Yes</a> (e.g., maintain 6 ft. distance)	<a href="#">Yes</a> (e.g., wash hands with soap and water)	No	On May 1, 2020, Stage 1 of the <a href="#">reopening plan</a> commenced, permitting most non-essential businesses to resume work subject	<a href="#">Yes</a> (e.g., establish protocol to maintain 6 ft. distance; encourage telework	<a href="#">Yes</a> (e.g., disinfect surfaces and objects regularly)	No	N/A

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					to certain requirements.	whenever possible)			
Illinois	<a href="#">Yes</a> , until May 30, 2020	<a href="#">Yes</a> (e.g., designate 6 ft. distancing with signage; provide online and remote access where possible)	<a href="#">Yes</a> (e.g., have hand sanitizer available for employees and patrons)	No	A broad reopening plan has not been announced, but effective May 1, 2020, greenhouses, garden centers, nurseries, and pet groomers were <a href="#">added to the list of essential businesses</a> , and elective medical procedures were allowed to resume.	N/A	N/A	N/A	N/A
Indiana	<a href="#">Expired</a> , May 1, 2020 at 11:59 pm	<a href="#">Yes</a> (e.g., designate with signage 6 ft. distancing; allow as many employees to work from home as possible)	<a href="#">Yes</a> (e.g., have sanitizing products available for employees)	No	<a href="#">Stage 2</a> of the Back on Track plan began May 4 for most counties, allowing manufacturers, retail and commercial businesses, shopping malls, personal services and restaurants and bars to open.	<a href="#">Yes</a> (e.g., comply with CDC social distancing guidelines; allow as many employees to work from home as possible)	<a href="#">Yes</a> (e.g., <a href="#">enhance abilities of employees, customers and clients to wash hands</a> )	<a href="#">Yes</a> (e.g., retail at 50% capacity)	<a href="#">Manufacturing and Industrial Retail Office Settings Restaurants Gyms Personal Services</a>
Iowa	<a href="#">Expired</a> April 30, 2020 at 11:59 pm, for all but	No	No	No	On May 1, 2020, non-essential businesses, including restaurants, gyms,	<a href="#">Yes</a> (e.g., reopening businesses including restaurants,	<a href="#">Yes</a> (reopening businesses must implement	<a href="#">Yes</a> (fitness centers, malls, libraries, retail	<a href="#">Restaurants Fitness Centers Malls Libraries</a>

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	22 listed counties <sup>4</sup>				retail stores and malls, could <a href="#">resume</a> operations in 77 of the state's 99 counties.	fitness centers, and malls must implement social distancing measures)	increased hygiene practices)	stores, and restaurants must limit number of customers to 50% of legal capacity)	<a href="#">Race Tracks</a> <a href="#">Other Retail</a>
Kansas	<a href="#">Expired</a> May 3, 2020 at 11:59 pm	<a href="#">Yes</a> (e.g., maintain 6 ft. social distancing; to the extent possible use telework capabilities to avoid meeting in person)	No	No	A <a href="#">phased reopening plan</a> has been announced. Phase 1 of reopening began May 4, 2020, allowing childcare facilities and libraries to reopen, but continuing to strongly encourage telework in businesses permitted to operate.	<a href="#">Yes</a> (e.g., maintain 6 ft. distances between work stations; encourage telework for all employees when possible)	<a href="#">Yes</a> (e.g., best public health practices for the industry must be followed)	<a href="#">Yes</a> (more than 10 individuals not allowed where impossible to maintain 6 ft. of distance)	<a href="#">Self-Service Food</a> <a href="#">Food Service Establishments</a> <a href="#">Transit</a> <a href="#">General Employers</a> <a href="#">Personal Service Providers</a>
Kentucky	<a href="#">Yes</a> , until rescinded by further order	<a href="#">Yes</a> (e.g., 6 ft. separation for employees and patrons)	<a href="#">Yes</a> (e.g., regular access to hand sanitizer)	No	Kentucky has announced <a href="#">its phased reopening plan</a> . Phase 1 of reopening will begin on May 11, with manufacturing, construction, vehicle dealerships, office-	<a href="#">Yes</a> (e.g., enforce social distancing)	<a href="#">Yes</a> (e.g., sanitizer/hand wash stations)	No	<a href="#">Meatpacking Facilities</a>

<sup>4</sup> Iowa's order applied only to certain specified non-essential businesses, was a more limited order closing only select businesses, and did not define what constituted an "essential" business.

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					based businesses, horse-racing, and dog-grooming allowed to resume operations				
Louisiana	<a href="#">Yes</a> , until May 15, 2020	<a href="#">Yes</a> (e.g., employees working with the public required to wear masks)	No (although employers are <a href="#">suggested</a> to post signage urging hand hygiene and cough and sneeze etiquette, etc.)	<a href="#">Yes</a> (e.g., 10-person limitation on gathering size applies to certain business operations non-essential businesses permitted to continue to operate)	If the state meets certain criteria by May 15, it will move into <a href="#">Phase 1</a> , which lifts the Stay at Home Order (in place through May 15) and eases restrictions on certain public spaces (e.g., houses of worship, restaurants) and open some non-essential businesses. The full details of Phase 1 have not yet been announced.	N/A	N/A	N/A	<a href="#">Funerals and Handling of Bodies</a> <a href="#">Restaurant</a>
Maine	<a href="#">Expired</a> April 30, 2020	<a href="#">Yes</a> (e.g., 6 ft. separation; post signage instructing customers to maintain distance)	<a href="#">Yes</a> (disinfect cart and basket handles)	<a href="#">Yes</a> (e.g., limitations based on size of retailer, including max 5 customers in any place of	Effective May 1, 2020, under the <a href="#">Together, We Are Maine: Restarting Maine's Economy plan</a> , healthcare providers, personal services (e.g., barber shops, hair salons,	<a href="#">Yes</a> (e.g., maintain 6 ft. physical distancing for staff, customers, and vendors; facilitate	<a href="#">Yes</a> (e.g., provide access to hand washing areas for staff, vendors, and	No	<a href="#">General Business</a> <a href="#">Drive-In Theaters</a> <a href="#">Healthcare</a> <a href="#">Golf</a> <a href="#">Outdoor</a> <a href="#">Marinas</a> <a href="#">Cosmetology</a>

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				business less than 7,500 sq. ft.)	pet groomers), certain religious services, outdoor recreation activities, auto dealerships and car washes can re-open	telework for vulnerable employees)	customers; post signage urging hand hygiene)		<a href="#">Dog Grooming</a> <a href="#">Auto Dealership</a> <a href="#">Car Wash</a>
Maryland	<a href="#">Yes</a> , until further notice	<a href="#">Yes</a> (follow any social distancing guidelines provided by the <a href="#">Maryland Department of Health</a> )	No	No	A date has not been announced for when the state will begin to reopen but has previewed a draft <a href="#">phased re-opening plan</a> .	<a href="#">Yes (e.g., continue with telework plans; 6 ft. of social distancing)</a>	N/A	N/A	N/A
Massachusetts	<a href="#">Yes</a> , through May 18, 2020	<a href="#">Yes</a> (social distancing protocols consistent with guidance provided by the <a href="#">Department of Health</a> )	No	No	A date has not yet been provided a date for when it will begin to reopen.	N/A	N/A	N/A	N/A
Michigan	<a href="#">Yes</a> , through May 15, 2020	<a href="#">Yes</a> (e.g., 6 ft. separation between employees and	<a href="#">Yes</a> (increasing standards of facility cleaning)	<a href="#">Yes</a> (e.g., restricting the number of workers to no more	The state has not yet released its full reopening plan. However, it has taken some steps to ease restrictions.	N/A	N/A	N/A	N/A

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		patrons; promote remote work)		than strictly necessary)	Effective April 24, 2020, bicycle maintenance shops, garden stores, groundskeepers, and storage operations, among others, have been <a href="#">allowed to resume</a> operations.				
Minnesota	<a href="#">Yes</a> , until May 18, 2020	<a href="#">Yes</a> (e.g., should comply with CDC social distancing guidelines)	<a href="#">Yes</a> (e.g., should comply with CDC guidelines on hygiene)	No	Effective April 26, 2020 at 11:59 pm, <a href="#">Executive Order 20-40 Allowing Workers In Certain Non-Critical Sectors to Return to Safe Workplaces</a> allows workers at industrial and manufacturing businesses and office-based businesses were allowed to return to work. <a href="#">Executive Order 20-48</a> further allowed additional workers in non-critical sectors to return to work, including retail businesses operating without customers	<a href="#">Yes</a> (e.g., implement a plan that establishes social distancing policies; facilitate remote work)	<a href="#">Yes</a> (e.g., establish hand hygiene policies for workers; establish cleaning and disinfection protocols)	No	N/A

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					entering the place of business.				
Mississippi	<a href="#">Expired</a> April 27, 2020 at 8:00 am	No	No	No	Effective April 27, 2020 at 8:00 am, <a href="#">Executive Order 1477</a> permitted many businesses, excluding gyms, clubs, tattoo parlors, salons, and other personal care facilities.	<a href="#">Yes</a> (in common areas, businesses shall maintain 6 ft. of distance to the extent possible)	<a href="#">Yes</a> (enforcing regular hand washing)	<a href="#">Yes</a> (retail businesses shall limit customers to 50% of store capacity)	N/A
Missouri	<a href="#">Expired</a> May 3, 2020 at 11:59 pm.	<a href="#">Yes</a>	<a href="#">Yes</a>	<a href="#">Yes</a> (e.g., 25% or less of capacity for stores with less than 10,000 sq. ft.; 10% or less of capacity for larger stores <sup>1</sup> )	On April 27, 2020, the first phase of the <a href="#">Show Me Strong Recovery Plan</a> was announced, which will begin May 4, 2020. Non-essential businesses may resume activities in accordance with certain guidelines.	<a href="#">Yes</a> (e.g., maintain 6 ft. of space between individuals where possible; enhanced precautions where 6 ft. is not possible)	<a href="#">Yes</a> (e.g., disinfect commonly touched surfaces; disinfect high-traffic areas)	<a href="#">Yes</a> (e.g., 25% or less of capacity for stores with less than 10,000 sq. ft.; 10% or less of capacity for larger stores)	<a href="#">Restaurants</a>
Montana	<a href="#">Expired</a> April 24, 2020	<a href="#">Yes</a> (e.g., designate 6 ft. distances and employ telework or other remote	<a href="#">Yes</a> (have hand sanitizer and sanitizing products readily available)	No	On April 27, 2020, the Governor's <a href="#">April 22, 2020 Directive</a> permitted most businesses to resume subject to certain requirements.	<a href="#">Yes</a> (e.g., develop and implement appropriate policies regarding social	<a href="#">Yes</a> (e.g., develop and implement policies regarding sanitation)	No	<a href="#">Outdoor Recreation</a> <a href="#">Restaurants and Bars</a> <a href="#">Personal Care</a>

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		working where feasible)			Restaurants, bars, and casinos remain closed until May 4, 2020. Gyms, pools, theaters, bowling alleys, and music halls remain closed through the end of the emergency.	distancing and continue to encourage telework whenever feasible)			
Nebraska	<a href="#">Expired</a> May 3, 2020 <sup>5</sup>	No	No	No	The state does not have a broad reopening plan, but the Governor has <a href="#">announced</a> that, following the expiration of the closing order, businesses reopening on May 4, 2020 will be subject to certain restrictions, based on their industry.	N/A	N/A	N/A	<a href="#">Salons</a> <a href="#">Childcare</a> <a href="#">Restaurants</a> <a href="#">Dental Practices</a>
Nevada	<a href="#">Yes</a> , through May 15, 2020	<a href="#">Yes</a> (e.g., disallowing the formation	<a href="#">Yes</a> (implement sanitation and	No	On or before May 15, 2020, the <a href="#">United Roadmap to Recovery</a> allows	<a href="#">Yes</a> (e.g., close common areas and	<a href="#">Yes</a> (e.g., individuals must wear	No	N/A

<sup>5</sup> Nebraska's Directed Health Measure of April 9, 2020 was not a broad order closing all non-essential businesses, but provided for the closure of beauty and nail salons, barber shops, massage therapy services, indoor theaters, tattoo parlors and studios, gentlemen's clubs, bottle clubs, and restaurants and bars for on-premises consumption. Those businesses were permitted to reopen May 3, 2020, with the exception of theaters and gentlemen's clubs, which the governor has [announced](#) must remain closed through May 31, 2020. The order imposes additional restrictions, such as the closure of on-premises food and liquor consumption, for certain counties through May 11, 2020.

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		of queues where people congregate)	disinfection policies that comply with CDC sanitation guidelines)		some businesses to resume subject to certain restrictions. Smaller businesses will be allowed to open first. Bars, nightclubs, malls, and sporting events remain closed.	encourage telework whenever feasible)	face coverings)		
New Hampshire	<a href="#">Expired</a> May 4, 2020 at 12:01 am	<a href="#">Yes</a> (create procedures to follow CDC social distancing guidance)	No	No	The Governor has announced a phased reopening plan titled Stay-at-Home 2.0. It includes <a href="#">COVID-19 Reopening Guidance</a> containing requirements for all employers and employees. On May 11, retail, drive-in theater, golf, and grooming businesses can expand services. On May 18, restaurants can expand their services.	<a href="#">Yes</a> (e.g., allowing employees to work from home as much as practical)	<a href="#">Yes</a> (e.g., regular sanitation of high-moderate touch surfaces at least every 2 hours)	No	<a href="#">Retail</a> <a href="#">Drive-In</a> <a href="#">Movie Theater</a> <a href="#">Golf</a> <a href="#">Grooming</a> <a href="#">Restaurants</a>
New Jersey	<a href="#">Yes</a> , effective until modified or revoked	<a href="#">Yes</a> (e.g., keep 6 ft. apart and allow telework	<a href="#">Yes</a> (e.g., frequent use of sanitizing products on	<a href="#">Yes</a> (e.g., essential retail limited to 50% max capacity)	The Governor has announced that the “Road Back” reopening plan is being developed, but	N/A	N/A	N/A	<a href="#">Retail</a> <a href="#">Restaurants</a>

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		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
		arrangements wherever practicable)	common surfaces)		not the timing or details of that plan.				
New Mexico	<a href="#">Yes</a> , through May 15, 2020	<a href="#">Yes</a> (e.g., 6 ft. social distancing to the greatest extent possible)	<a href="#">Yes</a> (e.g., ensure all surfaces are cleaned routinely)	<a href="#">Yes</a> (e.g., places of lodging shall not operate at more than 50% capacity)	Although the Governor has announced the easing of some restrictions, such as by allowing curbside retail delivery, it has not yet announced a comprehensive reopening plan.	N/A	N/A	N/A	N/A
New York	<a href="#">Yes</a> , through May 15, 2020	<a href="#">Yes</a> (e.g., must use to the maximum extent possible any telework procedures that they can safely utilize)	<a href="#">Yes</a> (e.g., using isopropyl alcohol wipes)	No	On April 26, 2020, the broad strokes of the first two phases of the <a href="#">reopening plan</a> were announced. Additional details are still forthcoming, but during Phase One, construction and manufacturing/wholesale supply chain businesses will be able to operate, and select retail will be able to use curbside pickup.	N/A	N/A	N/A	N/A

State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
North Carolina	<a href="#">Yes</a> , through May 8, 2020 at 5:00 pm	<a href="#">Yes</a> (e.g., maintain at least 6 ft. distancing to the extent practicable and direct employees to telework to the maximum extent possible)	<a href="#">Yes</a> (e.g., regularly cleaning high-touch surfaces to the extent practical)	No	On April 23, 2020, the Governor announced a <a href="#">three-phased reopening plan</a> that will go into effect upon the satisfaction of certain gating criteria related to decreased Covid-19 cases over a 14-day period.	<a href="#">Yes</a> (e.g., implement appropriate employee and consumer social distancing; employers encouraged to facilitate telework)	<a href="#">Yes</a> (e.g., implement enhanced hygiene and cleaning protocols)	No	N/A
North Dakota	<a href="#">Expired</a> May 1, 2020 at 8:00 am <sup>6</sup>	No	No	No	On May 1, 2020 at 8:00 am, previously closed businesses, apart from certain recreational and entertainment businesses, were <a href="#">permitted to reopen subject to certain conditions</a> .	<a href="#">Yes</a> (e.g., cloth face covering for all employees)	<a href="#">Yes</a> (e.g., provide sanitizer, so and water, or disinfectant at or near entrances)	<a href="#">Yes</a> (e.g., limiting the number of people occupying the facility to ensure 6 ft. of distance is possible)	<a href="#">Restaurants and Bars</a> <a href="#">Fitness Centers</a> <a href="#">Personal Services</a> <a href="#">Movie Theaters</a>
Ohio	<a href="#">Expired</a> May 1, 2020 at 11:59 pm	<a href="#">Yes</a> (e.g., designate 6 ft. spacing for employees)	<a href="#">Yes</a> (e.g., have hand sanitizer and sanitizing)	No	Beginning May 4, 2020, manufacturing, distribution, and construction	<a href="#">Yes</a> (e.g., cloth face covering for all employees)	<a href="#">Yes</a> (e.g., clean and sanitize workplaces throughout)	<a href="#">Yes</a> (establish maximum capacity at 50%)	<a href="#">Manufacturing Distribution &amp; Construction</a> <a href="#">Consumer</a>

<sup>6</sup> North Dakota's Executive Order 2020-06.1 order of March 27, 2020 was not a broad order closing all non-essential businesses, but provided for the closure of on-premises dining at restaurants/bars, recreational facilities (e.g., gyms, theaters), cosmetology businesses, and elective personal care services (e.g., tattoo parlors).

State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
		and customers in line and allow as many employees as possible to work from home)	products readily available for employees and customers)		businesses as well as general office environments <a href="#">may reopen</a> . Beginning May 12, 2020, consumer, retail and services may reopen. Schools, dine-in restaurants and bars, personal services, adult daycare, entertainment, recreation, and gyms remain closed.		workday and at the close of business or between shifts)		<a href="#">Retail &amp; Services</a> <a href="#">General Office Environments</a>
Oklahoma	<a href="#">Expired</a> April 30, 2020	No	No	No	Beginning April 24, 2020, personal care businesses and state parks were <a href="#">permitted to reopen</a> . Beginning May 1, 2020, dining, entertainment, sporting venues, gyms, tattoo parlors, and places of worship may reopen. Bars remain closed until May 15.	<a href="#">Yes</a> (e.g., implement appropriate policies regarding social distancing and PPE)	<a href="#">Yes</a> (e.g., adhere to CDC guidance which includes providing hand-washing capability or sanitizer)	No	<a href="#">Museums</a> <a href="#">Bars</a> <a href="#">Entertainment</a> <a href="#">Personal Care</a> <a href="#">Gyms</a> <a href="#">Outdoor Recreational Facilities</a> <a href="#">Pet Grooming</a> <a href="#">Spas</a> <a href="#">Tattoos</a>
Oregon	<a href="#">Yes</a> , until terminated by	No	No	No	The reopening plan is not in force yet but the state has	N/A	N/A	N/A	N/A

State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
	subsequent Order <sup>7</sup>				previewed a draft phased <a href="#">reopening plan</a> .				
Pennsylvania	<a href="#">Yes</a> , until May 8, 2020 at 12:01 am	<a href="#">Yes</a> (e.g., provide masks for employees to wear at work)	<a href="#">Yes</a> (e.g., for employees interacting with the public, schedule hand wash breaks for at least every hour)	<a href="#">Yes</a> (e.g., 50% max occupancy for public facing businesses)	The reopening plan is not in force yet but the state has published its phased <a href="#">reopening plan</a> .	<a href="#">Yes</a> (e.g., continue to maintain social distancing and to continue telework where feasible)	<a href="#">Yes</a> (follow CDC and DOH cleaning guidelines)	No	N/A
Rhode Island	<a href="#">Yes</a> , until May 8, 2020	No	No	No	The reopening plan is not in force yet but the state has published its phased <a href="#">reopening plan</a> .	<a href="#">Yes</a> (e.g., cloth face covering for all employees and promoting work from home)	<a href="#">Yes</a> (e.g., hand-washing and increased cleaning)	No	N/A
South Carolina	<a href="#">Expired</a> , May 4, 2020	<a href="#">Yes</a> (e.g., prohibiting customers to congregate within 6 ft.	<a href="#">Yes</a> (e.g., requiring businesses to comply with CDC and DHEC	<a href="#">Yes</a> (e.g. occupancy not to exceed five customers per 1,000 ft.	The state has announced <a href="#">accelerateSC</a> , a <a href="#">Coordinated Economic Revitalization Plan</a> ,	<a href="#">Yes</a> (e.g., keeping customers 6 ft. apart)	<a href="#">Yes</a> (e.g., follow CDC guidelines, which include	<a href="#">Yes</a> (e.g. limiting occupancy so as not to exceed 5 customers	<a href="#">Restaurants</a>

<sup>7</sup> Oregon's Executive Order No. 20-12 did not close all non-essential businesses, but provided for the closure of certain retail (e.g., furniture, jewelry), entertainment businesses, gyms, on-premises restaurants/bars, and personal services; businesses permitted to operate were to facilitate telework as much as possible.

State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
		of one another and encouraged to use work from home options)	sanitation guidelines)	or 20% of maximum occupancy)	and, beginning April 20, 2020, some retail businesses were permitted to <a href="#">reopen</a> , subject to certain restrictions.		providing hand-washing capability or sanitizer)	per 1,000 ft. or 20% of maximum occupancy)	
South Dakota	No closure order <sup>8</sup>	No	No	No	The <a href="#">reopening plan</a> went into effect on April 28, 2020 asking employers to begin transitioning employees back to the workplace. The plan notes that no business in South Dakota was ever required to close.	No (although precautions such as <a href="#">masks</a> are suggested)	<a href="#">Yes</a> (e.g., employers should encourage good hygiene and sanitation practices)	No (although businesses can consider <a href="#">restricting</a> occupancy)	N/A
Tennessee	<a href="#">Expired</a> April 29, 2020 at 12:01am	<a href="#">Yes</a> (take steps to enable and permit remote working)	<a href="#">Yes</a> (e.g., follow CDC hygiene guidance)	No	Beginning April 29, 2020 at 12:01am, under <a href="#">Executive Order 30</a> most businesses were permitted to reopen subject to restrictions, but close-contact personal services, entertainment,	<a href="#">Yes</a> (e.g., implement social distancing guidelines and modify schedule)	<a href="#">Yes</a> (e.g., implement workplace cleaning and disinfect practices)	No	<a href="#">General Businesses</a> <a href="#">Restaurants</a> <a href="#">Exercise Facilities</a> <a href="#">Retail</a>

<sup>8</sup> South Dakota [Executive Order No. 2020-08](#) did not close businesses, but recommended the suspension or modification of service of enclosed retail businesses that promote public gatherings (e.g. any enclosed facility, operating as a bar, restaurant, brewery, cafe, casino, coffee shop, recreational or athletic facility, health club, or entertainment venue). Such businesses were encouraged to alter operations if their business required that 10 or more people be in an enclosed space with less than 6 ft. of distance between them.

State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
					recreational, and venues must remain closed through May 29, 2020, at 11:59 pm.				
Texas	<a href="#">Expired</a> April 30, 2020	<a href="#">Yes</a> (e.g., essential services provided through remote telework where possible)	<a href="#">Yes</a> (e.g., practice good hygiene and observe CDC guidance)	No	On April 27, 2020, the Governor released his <a href="#">Report to Open Texas</a> . Beginning May 1, 2020 at 12:01pm, pursuant to <a href="#">Executive Order No. GA-18</a> , all retail stores, restaurants, movie theaters, malls, museums, and libraries are permitted to reopen but must limit their capacity to 25% of their listed occupancy until May 15, 2020.	<a href="#">Yes</a> (e.g., employees maintain at least 6 ft. separation from others)	<a href="#">Yes</a> (e.g., train all employees on hand hygiene)	<a href="#">Yes</a> (e.g., limit retail to 25% occupancy)	<a href="#">Retail</a> (p. 23) <a href="#">Restaurants</a> (p. 27) <a href="#">Movie Theaters</a> (p. 31) <a href="#">Museums and Libraries</a> (p. 35) <a href="#">Outdoor Sports Participants</a> (p. 38) <a href="#">Churches/ Places of Worship</a> (p. 39) <a href="#">Single-Person Offices</a> (p. 42)
Utah	<a href="#">Expired</a> April 30, 2020 <sup>9</sup>	<a href="#">Yes</a> (e.g., enhancing social distancing)	<a href="#">Yes</a> (e.g., provide hand soap, hand	No	Effective May 1, 2020 at 12:01am, pursuant to <a href="#">Executive Order No.</a>	<a href="#">Yes</a> (e.g., 6 ft. separation)	<a href="#">Yes</a> (e.g., hand sanitation,	No	<a href="#">Phased Guidelines address:</a>

<sup>9</sup> Utah did not have an order widely closing Non-Essential Businesses. On April 17, 2020, Utah released Version 2 of its [Utah Leads Together](#) plan for economic recovery, and, as an addendum, included [Phased Guidelines](#), which establish tiered health and safety recommendations based on risk level. Until April 30, 2020, Utah was at High Risk, which provided for closures of gyms and fitness facilities and the dine-in portion of restaurants, as well as limited operations for personal service businesses (e.g., barbers, nail technicians). Effective May 1, 2020, the state is at “Moderate Risk.”

State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
		by grouping employees and volunteers into cohorts of no more than ten individuals that have limited contact with other cohorts in the workplace)	sanitizer, or sanitizing wipes)		<a href="#">2020-19</a> , restaurant dine-in services, personal services businesses (e.g. barbers, nail technicians), and fitness centers and gyms may open in strict compliance with health and safety guidelines.		disinfect surfaces)		Restaurants, bars, convenience stores; Retail; Hospitality; Events and entertainment; Personal Services; Home Repair; Gyms and Fitness Centers; Construction, General; Contractors; Day Care
Vermont	<a href="#">Yes</a> , until May 15, 2020	<a href="#">Yes</a> (6 ft. separation; use remote work whenever possible)	<a href="#">Yes</a> (wash hands and disinfect)	No	<a href="#">Effective April 20, 2020</a> , outdoor workers, manufacturers, distribution operators, interior construction, supporting services and retailers may resume operations pursuant to certain restrictions.	<a href="#">Yes</a> (e.g., 6 ft. separation; use remote work whenever possible)	<a href="#">Yes</a> (e.g., easy and frequent access to handwashing, disinfecting of common spaces and equipment)	<a href="#">Yes</a> (e.g., max. 2 people in one vehicle when conducting work)	N/A
Virginia	<a href="#">Yes</a> , through	<a href="#">Yes</a> (adhere to	<a href="#">Yes</a> (enhanced	No	The full reopening plan has yet been	N/A	N/A	N/A	N/A

State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
	May 14, 2020	social distancing recommendations; use remote working as much as possible)	sanitizing practices on common surfaces)		published but the state <a href="#">has indicated</a> that it intends to move forward with a phased reopening strategy.				
Washington	<a href="#">Yes</a> , until May 31, 2020	<a href="#">Yes</a> (must implement social distancing guidelines from OSHA and <a href="#">WA State Dep't of Health</a> , which advises remote work)	<a href="#">Yes</a> (must implement sanitation measures from OSHA and the <a href="#">WA State Dep't of Health</a> )	No	An overview of the <a href="#">four-phase reopening strategy has been presented and is</a> set to begin on May 5, when certain existing construction projects, landscaping, automobile sales, retail (curb-side and pick-up order only), car washed, and pet walks may resume business.	N/A	N/A	N/A	N/A
West Virginia	<a href="#">Expired</a> May 4, 2020	No	No	No	The <a href="#">reopening plan</a> commenced on April 30, 2020. The plan is divided into weeks, with tentative dates on which to relax restrictions. Small	<a href="#">Yes</a> (e.g., practice physical distance, use face coverings)	<a href="#">Yes</a> (implement sanitizing steps)	No	<a href="#">Small Businesses Restaurants Religious Entities and Funeral Homes</a>

State	Order Closing Non-Essential Businesses				Reopening Plan				
	In Effect?	Requirements for Businesses Permitted to Remain Open			Reopening Status	Requirements for Reopening Businesses			Industry Specific Guidelines
		Social Distance	Sanitation	Occupancy Limits		Social Distance	Sanitation	Occupancy Limits	
					businesses, professional services, and outdoor dining service can resume on May 4, 2020 at 12:00 am.				<a href="#">Professional Services</a>
Wisconsin	<a href="#">Yes</a> , until May 26, 2020 at 8:00 am	<a href="#">Yes</a> (maintain 6 ft. separation; use remote working to greatest extent possible)	<a href="#">Yes</a> (e.g., wash hands with soap and water for at least 20 seconds as frequently as possible)	No	No broad reopening plan has yet been released.	N/A	N/A	N/A	N/A
Wyoming	<a href="#">Expired</a> April 30, 2020 <sup>10</sup>	No	No	No	<a href="#">Effective May 1, 2020</a> , gyms, barber shops, hair salons and other personal care services were permitted to reopen under certain operating conditions.	No	No	No	<a href="#">Gyms Personal Care Services</a>

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<sup>10</sup> Wyoming's relevant Statewide Public Health Orders were not a broad order closing all non-essential businesses, but provided for the closure of on-premises dining at restaurants, bars/cigar bars, gyms, theaters, child care (except those servicing the children of Essential Personnel, as defined in the order), and personal services (e.g., nail salons, massage parlors).

Cleary Gottlieb has established a [COVID-19 Resource Center](#), providing information and thought leadership on developing events. In addition, we have a [COVID-19 Task Force](#) that is acting as a repository for practical solutions, best practice and issue-spotting to help our clients by sharing market experience, insight and advice from across our global presence.

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