

**Covid-19 Industry Experts Call: Re-Opening Strategies**  
**Friday, May 8, 2020 @ 10:00 AM**

**Lacey Weaver, LCUL:**

- League website updated weekly with COVID details
- Prepping for next week's reopening announcements from Governor Edwards

**Ed Reisinger, KRP:**

- CU has flexibility of what it can require of its employees
  - Temp check of staff upon entering the parking lot
  - Verify temperature at home
  - Verify temperature periodically in the day
  - Notify management of any specified symptoms

NOTE: must pay staff for the time consumed in this process.

- 'Other Duties as Assigned' – new duties, like cleaning areas, can be added.
- Set standards:
  - Limit how many go to lunch at once
  - Limit how many go on break together
  - Multi-stall bathrooms are now considered ONE bathroom
  - Limit the number of people in our lobbies

NOTE: all new standards must be provided, in writing, to all employees

- Masks:
  - CU must provide PPE for its employees, especially if these are now new requirements
  - If employee refuses to abide by CU policy on wearing masks, they can be sent home without pay
- CDC Guidelines:
  - Determine your needs first. Then make a plan for how often this surface will be cleaned.
    - Based on how often they are touched
    - Doors, handles, seating
    - Vault, coin machine
  - CU decides how many can be permitted into the facility at once (staff & members)
  - If tracking medical information (temps & symptoms), this should be kept separate from other employee information, and must be kept confidential
- Louisiana Dept of Health has issued specific requirements for financial institutions
  - Gloves for money and card handling
  - Continual hand washing
- CU can require a doctor's note when an employee is able to return to work.
  - Does the employee continue to portray a direct health threat to the other staff?
  - Know your CU policy: a physician's note or a doctor's note? (A doctor's note may be difficult to obtain at this time)
- Consider accommodations for staff upon request:
  - Moving to a less-contact area if employee is susceptible

- Masks, gloves, goggles (do they need to be latex-free?)
- Tax Credits: There are some that your CU can ask for:
  - 80 hours of sick leave and FMLA extensions
    - CU can apply for a credit back on payroll taxes paid
      - Clearly track any sick or FMLA time paid out
  - CARES ACT
    - CU can request up to \$10K/ employee if CU is having substantial hardships
    - Via tax credits

#### **Jonathan Kudulis, KRP:**

- Verification of Members:
  - CUs must decide how to verify the members ID
- Electronic signatures are as legal as wet signatures
  - Be sure have the proper eSign disclosures
  - Be sure to verify the members identity
  - NOT legal for bank wire requests
- 'Return to Work' Law
  - CUs are identified as essential
  - The 'Phase In' guidelines are not necessarily subject to these because we are essentially 'Phase 0'
  - There's no specific mandate that said branch lobbies had to fully close. Therefore, how the lobby is reopened, can be done within their autonomous business structure.
  - What is our liability in regards to staff or members getting sick?
    - It's a grey area
    - The law does require 'causation'. And because of the extended life cycle of the virus on surfaces, 'causation' is small – and, most likely, unprovable
- Reg CC changes become effective 7/1/20
  - Hold-fund limits change
  - Disclosures must change
  - A change-in-terms notice must be issued (can be done 30 days after the change)
    - Electronically to e-members
- Reg D changes
  - Each CU can allow members to exceed the 6 transaction limit
  - Can continue the excessive fee for the additional withdrawals
- CD Rate matches
  - Be sure that the renewal rate matches the disclosures already in place

#### **Carlos Molina, CUNA Mutual Group**

- When reopening, look at safety
  - Physical, emotional well-being
    - Some will be scared to return for the additional exposure
- When reopening, look at communication
  - A rise in cases of harassment and bullying
  - Provide access to communication to all staff
    - To help steer this, poll staff for their greatest fears
    - Conduct a re-entry survey

- Cybercriminals haven't decreased
  - Large increases in Phishing attacks
    - Continue to run Phishing campaigns with staff
      - Don't test with "COVID" subject lines as it's emotional.
      - Be clear with staff that COVID emails are NOT in tests
- Be aware of local, state, national laws and orders when re-opening
  - Designate certain management members to be tracking for updates
- OSHA signage
  - Administrative – Policy control – new policies and procedures will be needed for social distancing, cleaning, certain soaps, etc
  - Engineering – changes must be made
    - No sitting across from each other
    - How are tellers to be stationed?
    - Look at surface areas (some CU's are purchasing laminate furniture because easier to clean)
    - Plexi dividers for tellers
    - Look at meeting rooms (at least for the first few weeks)
      - Fitness facilities – shut down
      - Child care – shut down
      - Common areas – reduce numbers
    - Increase email communications, not walking to a neighboring cube
  - PPE –
    - What is a face covering, what is a mask?
      - Certain material prove more effective than others
    - Be clear on how a mask can be worn
    - Consider extra accommodations (gloves) for those handling cash and mail
    - Use caution is purchasing off-brand sanitizers
- In cleaning...
  - With a 3<sup>rd</sup> party cleaning company, do due-diligence
    - Get list of cleaning agents and be sure they align with EPA
- e-signatures for wires:
  - CU can be held liable with certain loop holes
  - Wet signature best option here
- Cost-Benefit analysis for reopening:
  - Know the guidelines to reopen
  - Know how much it'll cost to reopen
  - Some facilities are remaining closed b/c cleaning is too expensive.

#### Q&A:

1. Can you tell other employees if an employee has been tested?
  - a. CU has a responsibility to tell staff that someone is tested
  - b. Do not share who was tested
  - c. Work on verbiage for communicating possible exposure to staff/ members (League has sample language for this)

2. If employee is not sick with COVID-related issues, defer back to regular employee policy and standard sick/ PTO
3. Does a staff member wear a mask behind a plexi shield?
  - a. Know your area laws – in Louisiana, face masks are required when dealing with the public
4. Can you take member temp? And turn them away?
  - a. This is acceptable. Members can access funds in other ways (online, ATM, etc)
  - b. Carlos recommends drive-by screening
    - i. Must properly provide protections for employees who will be testing
    - ii. How will they be protected?
    - iii. Consider a 3<sup>rd</sup> party vendor to reduce risk to employees
5. Board meetings?
  - a. Going virtual
  - b. Telephone and virtual meetings are a legal substitution for an in-person meeting, per NCUA guidance
6. No legal reason to keep a log of what members come in to the CU
  - a. Know your city ordinance (but it's a privacy concern)
7. 10 person limits: how do you bring in all staff?
  - a. Create A/B teams
  - b. Allow those who can work remotely to do so
8. Smell test not an adequate test for COVID. If you believe an employee may be impacted by COVID, send them home (delicately and professionally). Require a note from health care provider for a return to work.