



2020 eBook Series

Rise Above Your Risk

# Branch Reopening Playbook



Including just-in-time insights: 7 Considerations When Planning to Reopen

**Risk & Compliance Solutions**

800.637.2676

[RiskConsultant@cunamutual.com](mailto:RiskConsultant@cunamutual.com)



### What Credit Unions Should Be Considering



## 7 considerations when planning to reopen

1. Ensure compliance with federal, state, and local government orders
2. Manage employee concerns and communication
3. Implementation of administrative policy controls
4. Revisit workplace design
5. Consider screening protocols
6. Availability of personal protective equipment (PPE)
7. Guidelines for workplace cleaning



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With state Shelter-in-Place Orders expiring, credit unions should focus their efforts toward how to best reopen locations, while safely serving members, and bringing employees back to the workplace.

A purposely gradual effort should be made to reduce restrictions, and safeguard against further infection. The goal of reopening and maintaining a branch that is safe for members and employees alike should be based on a hierarchy of controls, rigorous communication, and continuous monitoring of the situation.

Making the decision to reopen offices and preparing to bring employees back to the workplace could be one of the most critical decisions you'll ever have to make.

### Challenges will exist

Spending time considering and implementing policies, procedures, and controls should help ensure your organization is well equipped to handle the transition efficiently while working through these and other challenges.

**Office / Branch Priorities** – You should have a clear understanding of the priorities in which you would like to open offices and branches.

And, reopening may not mean serving every member all at once. A phased approach could be based on geography, by member type, by transaction type, or it could be by intent. For example, some might only allow potential members to use their branches during the initial phase and some are keeping lobbies open only for existing members. Others might decide to just open to handle those transactions that cannot be completed through mobile or online.

**Member resistance** – Whether it is complying with wearing facemasks, or taking their temperature to enter a branch, or being reluctant to adopt the use of digital channels for some transactions to limit face-to-face interaction; your credit union must determine how your members will respond without putting staffing models at risk.

**Monitoring and tracking hours** employees are working outside of the office – especially those who aren't salaried and are non-exempt.

**Safe Work Environment** - Employee health and safety should remain a top priority – ensure the workplace is suitable for getting the job done without posing undue risks. What physical changes will be needed to make the workplace safer – space configuration; temporary partitions; office hygiene; and health-conscious messaging for behavior reminders for staff/members.

**Security** - Wearing masks will likely present a problem for physical security coming in the form of increased robberies, impersonation fraud, and even abusive members and threats.

# Branch Reopening Playbook and Risk Overview

## 1 Ensure compliance with federal, state, and local government orders

Reopening will be jurisdiction-specific, subject to compliance with all state and local directives as well as any industry-specific requirements.

Monitor the lifting of government Shelter-in-Place Orders to determine appropriate time frames, and phases for returning to work. The White House recently issued guidelines for "[Opening Up America Again](#)." The guidelines set forth three phases to reopen state economies, with each phase lasting a minimum of 14 days. These guidelines however do not supersede applicable state and county health orders. Just as the shutdown orders were enacted on a state-by-state basis, it appears reopening orders will follow a similarly varied approach, creating challenges, especially for credit unions who are multi-state employers.

As individual states and localities work through their various approaches to reopening, there are some general strategies that credit unions should consider as part of their reopening plans. Efforts should be made to review and comply with CDC and OSHA guidelines on safe practices in the workplace.

Each state and regional reopening pact will be unique with specific conditions and limitations possibly pertaining to credit unions within their borders. It will be important for credit unions to carefully review state- and locality-specific orders and consult with legal counsel when questions arise.



## 2 Manage employee concerns and communication

Credit unions will need to navigate through and consider multiple steps in their communication plan as they move toward reopening. A central focus should be paid to managing fears as both employees and members consider the ramifications of returning to a branch.

Set clear expectations that you will be sharing facts, not opinions related to COVID-19. You have a responsibility to provide all stakeholders with honest and accurate information, and at no time should the credit union staff or leadership be sharing personal points of view.

It is also important to provide assurances that you are reviewing your state(s) data and will implement necessary changes accordingly. Commitments should be made that you are making every effort to not put anyone in jeopardy, and that all decisions are being made with employees in mind.

Prior to reopening, a determination of which groups of employees will be allowed to return to work first and when should be made. Special consideration should be paid to potentially vulnerable individuals as defined by the [CDC](#). To the extent these employees can continue to successfully work remotely, they should be allowed to do so.

For those who will be returning to the workplace...every effort should be made to contact those individuals and inquire or interview about any specific concerns or fears they may have. Consider if the concerns expressed have already been addressed in your reopening plan, or if additional steps and/or safeguards are necessary. Engaging in these types of conversations prior to reopening may avoid or minimize the likelihood of escalation or misunderstandings.

Ultimately credit unions need to communicate that you will make every effort to operate in a safe and productive manner, while understanding the need to adjust the environment should things become unsafe for your employees.

As an employer, **consider the various employee legal entitlements** such as those imposed by EEOC, ADA, FMLA, OSHA, NLRB, Workers' Compensation policies as well as how those are impacted by new legislation such as FFCRA (Families First Coronavirus Response Act), when responding to employee concerns. Reporting procedures to express any concerns related to safety concerns or these protections should be clearly communicated to all employees and be documented in policy.

### 3 Implementation of administrative policy controls

There may be significant liability risk from lawsuits stemming from efforts to reopen certain locations. Credit unions should follow official federal, state, and local agency guidance while completing a comprehensive review of existing policies and consider filling certain gaps related to safety protocols to help prevent the spread of COVID-19.

**Flexible scheduling, staggered start times, remote work and leave policies** should be created to allow employees to stay home to care for sick family members or care for children if schools and childcare facilities remain closed. Actively encourage sick employees to stay home without fear of reprisal.

**Social distancing policies** should be documented and regularly prioritized. These should encourage employees to maintain six feet from others whenever necessary, avoid handshakes, prevent congregation in common areas, discourage or eliminate all unnecessary travel, strongly advise employees to bring their own lunch, and limit all workplace-sponsored social or professional large gatherings. Many of these provisions may also be subject to state or local guidance.

All **workplace visitor policies** should be reconsidered, with accessibility being limited to key vendors and third parties that are pre-approved by credit union management.

Updated **communication policies** should urge employees to avoid in-person meetings whenever possible and promote the use of virtual meetings, internal chat functions, and email.

**Workplace hygiene standards** should be consistently emphasized and communicated via health-conscious messaging and signage throughout the organization. The workplace hygiene standards should include but not be limited to:

- Washing hands often with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer.
- Avoid touching eyes, nose, and mouth with unwashed hands.
- Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
- Clean and disinfect frequently touched objects and surfaces.
- Stay home when you are sick - perhaps the most important message you can give to employees.

#### Plan & Policy

Credit unions should develop a written virus and disease control response plan to highlight the items listed above as well as other mandated practices employees should follow to inhibit the spread of COVID-19 as well as other infections within the workplace and community.

Two specific template policies are available within the employment practices risk management hub, [www.epl-risk.com](http://www.epl-risk.com):

- 7.11.1 Virus, Bacteria, and Disease Control” and
- 7.11.2 Social Distancing”

The website portal also provides practical and actionable resources including articles, checklists, and other template policies focused on the most relevant legislation, employment, and workplace trends.



### 4 Revisit Workplace Design

Credit union workplace environments will need to be updated in response to the COVID-19 pandemic. Employees will hesitate to return to an office that doesn't feel safe, and many high-density workplaces with shared spacing will need to be modified. This may include new layouts in the space to help promote six feet of social distancing, as well as adding new elements to workstations, like glass partitions or higher cubicle walls.

The guiding principles behind the new workspace will be managing of population density, furniture arrangements, and the adoption of barriers where feasible.

Workspaces will need to be reconfigured to accommodate distancing guidelines, while preparing for gradual return of 100% of the workforce. Layouts should be highly adaptable and capable of quick change. Desks, tables and seating areas may need to be removed with a shift toward eliminating shared desking and transitioning to more owned individual spaces. Thought should also be given to reducing face to-face orientation by turning workstations to prevent workers from working or sitting directly across or behind one another.

Removable space divisions such as screening or partitions may also be adopted to increase spacing, increase privacy and assist in meeting new health and safety requirements for a post-COVID-19 work environment.

The ability to clean and disinfect interior workplace surfaces is more important than ever. Thought should be given to replacing older wood, and steel furnishing with laminates, painted metals, and other hard surfaces that can be cleaned with commercial cleaning products specified for killing disease-carrying germs. Additionally, there are vendors that also sell adhesive push pads for doors, surface mats for high-touch areas, touchscreen overlays, and cannister wraps.



Some are considering modifications, addition of plexiglass shields, floor markers, air filtration systems, and even automatic doors. There's going to be a lot of variety.

Simple things like reorganizing and limiting access can have a positive impact on social distancing and office traffic areas without negatively impacting credit union operations.

Think about what the risks are and how to reduce that risk, because obviously you can't take risk to zero.

### 5 Consider Screening Protocols

Subject to some state plans and in efforts to ensure safety, some credit unions may introduce screening protocols for employees and third parties (member, visitors, etc.) The [Equal Employment Opportunity Commission](#) (EEOC) confirmed that the COVID-19 pandemic meets the "direct threat" standard for employee medical examinations and disability-related inquiries.

Credit unions will not violate the ADA by requiring employees to undergo medical examinations, such as temperature checks, or asking employees disability-related questions, such as whether the employees suffer from underlying health conditions that may make COVID-19 more severe for them. As with all medical information, an employee with a fever or an underlying health condition is subject to the ADA's confidentiality requirements.

For credit unions pursuing temperature screening, it is important that steps are taken to ensure factors such as safety, confidentiality, and compliance with all applicable state and local rules are complied with.

A few additional factors should be considered:

- **Decide who will be screened.** Some employers are screening only workers who were or may have been exposed to a person suspected or confirmed to have COVID-19; while others may screen all individual prior to entry. At all times, credit unions must ensure that selection for screening is done on a nondiscriminatory basis.
- **Decide who will conduct the screening.** This may be done by asking an individual to take their own temperature and showing the thermometer's results to a screener; to assigning certain employees the duty; to using third-party contractors with healthcare backgrounds. Regardless of who is completing the screening, consideration must be given to training protocols, the wearing of proper personal protective equipment (PPE), what type and how a thermometer may be used, and clearly defined decision-making protocols for allowing entrance and when to deny entry.
- **Determine where you will conduct screenings.** The CDC recommends that screenings be conducted before entry into a workplace. One option may be to consider a drive-thru screening process. In this scenario appropriate traffic controls, signs, and markings should be used to direct traffic and provide safe locations for testing. Consideration should given to not block exits or fire lines during the screening process.
- **Develop the documentation process.** Credit unions should determine what information will be documented, how it will be documented, and where such documentation will be confidentially stored.



### 6 Availability of Personal Protective Equipment (PPE)

While also subject to individual state reopening plans, credit unions should make every attempt to make Personal Protection Equipment (PPE) available to all employees.

Adequate supplies of PPE such as face coverings, masks, gloves, and hand disinfectant should be provided to employees, along with training and policy language on their most effective, safe, and expected use. Consideration should also be given for guidelines when to change PPE and how to properly dispose of PPE.

It may be important to properly define face coverings to include but not limited to cloth (e.g. homemade sewn, bandanas, surgical masks, N-95 respirators, and face shields). Credit unions should review the [Centers for Disease Control and Prevention's "Coronavirus Disease 2019 \(COVID-19\)"](#) website for information on cloth face covers and other types of personal protective equipment (PPE),

In some cases, an employee may request to use personal PPE in lieu of credit union-provided PPE. Because such requests may require the employer to evaluate the efficiency of the substitute, consideration should be given to discouraging these types of requests, absent any specific federal, state, or local guidance to the contrary.

Credit union's handle members differently per direction of the Board and senior management. Credit unions should not prohibit members from the wearing of face coverings or masks. While there is some concern regarding increased robbery risk, some considerations are:

- Post hours of operations and guidelines for safety on the outside of the building. Have a sign saying we regret any inconvenience caused, but it is credit union policy to request brief removal of anything blocking the face for safety purposes
- Have members wait outside in the vestibule to be identified by staff before being let in or have a greeter at the door identifying members before proceeding

If you are limiting number of members in the credit union at one time have space markers allowing for proper social distancing and flow of traffic outside should a line starts to form

- Encourage members to use online banking, ATMs, ITMs and drive-throughs if entry into the office is not a necessity. Allow members into the lobby by appointment only and request a driver's license or photo ID to confirm the individual.



#### Can we request that members / non-members remove masks for identification purposes?

If state protocols permit, employees may request for members to lower masks from 6 feet away to confirm their identity. Post signage indicating that you will be asking them to remove them and encourage social distancing within the building.

One practice to consider is to have an employee outside the door, not only to monitor traffic but to interview members to gauge their level of anxiety. Members that don't seem to fit the standard profile should be further evaluated by trained staff and security support. Educate your members to drop their masks and look directly at the greeter or wave to the camera before reinstating their masks and conducting their transactions.

If members are unwilling to remove masks, and credit union policies do not prohibit service to members without matching their faces to photo ID, allow them to confirm identity according to the credit union's drive-through and telephone protocols (e.g. providing photo ID, confirming account information, providing an account holder password, etc.).

## 7 Guidelines for Workplace Cleaning

The Centers for Disease Control recently updated its [guidelines](#) for cleaning and disinfecting, including those that apply to employers. These guidelines address proper disinfectant techniques and solutions, and specifically advise how to clean soft surfaces (i.e., carpeted floors, rugs, and drapes), electronics, and laundry. The CDC's guidelines also address the appropriate steps to take if an individual in your building or facility tests positive for COVID-19.



Adopt practices that reduce the possibility of exposure. Encourage employees to disinfect hard surfaces before and after they use them (copy machines, printers, ATMs, drive-up pneumatic carriers / cannisters, remote controls, elevator buttons and keyboards). Soft and porous items (cloth, and other fabrics) are more difficult to disinfect, and those items should be stored if possible. If they are necessary, they should be cleaned or laundered following the manufacturer's directions.

For items that must be cleaned and disinfected, clean first (with soap and water), then disinfect with an [EPA-approved disinfectant](#). If disinfectants are in short supply, alternative disinfectants can be used. For example, 1/3 cup of bleach added to 1 gallon of water, or 70% alcohol solutions.

Additional surfaces to consider – doorknobs / handles, light switches, counter tops, desks, phones, toilets, faucets, sanitation stations, touch screens, writing utensils, etc.

Third-party cleaning / custodial schedules should be accelerated with focus on high density high touch hard surfaces. If employees are asked to clean or disinfect surfaces make sure proper PPE is provided, and that any cleaning or disinfectant solutions are used according to manufacturer standards.

Detailed logs of cleaning efforts should be maintained in order to verify the credit unions efforts.

### What suggestions do you have for deep cleaning for office reentry and reopening?

CUNA Mutual Group has negotiated a national rate with SERVPRO® for COVID-19 cleaning for policyholders. SERVPRO® professionals are trained to perform a proactive cleanup that involves facility or structure cleaning and disinfection. Cleanup procedures generally include cleaning of porous and non-porous surfaces, disinfecting of non-porous surfaces, cleaning and disinfecting of equipment, tools, and/or supplies used for cleanup process, and disposal of waste. You can reach SERVPRO® at **1.800.SERVPRO**.

### Summary

For decades financial institutions have been shrinking the footprint of branches. Suddenly, it would seem, branches are going to be putting too many people in too small of a space. Instead of increasing space, credit unions are taking steps to control traffic in physical ways and digital ways, and will make multiple changes in branch layout, policies, and practices.

Overall visibility and communication of what the credit union is doing will be imperative to make it clear that you're taking the public's health concerns seriously.

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