

## **COVID-19 Reopening Checklist for Credit Unions**

The following list is designed to assist credit unions with their branch and office reopening plans during the COVID-19 pandemic. This list is not meant to be comprehensive, but rather to be used as resource for credit unions leaders to use in their reopening plans. Many of the individual line items have additional thoughts and conversation points in the pages following this checklist.

### **Communicating with Staff and Members**

- Has the credit union identified reputable resources that will be relied upon for making decisions affecting operations?
- Has the leadership identified the individuals that will address the concerns that may arise for members and/or staff?
- Has leadership outlined the talking points on how the credit union is addressing the COVID-19 pandemic?
- Are staff members aware of the cleaning, disinfecting, and sanitation plans for the offices?
- How will changes in future operations be addressed with staff and members?
- How will staff members be scheduled in the office?
- Have the members been notified through various channels how the credit union is reopening, and what protocols have been implemented?

### **Preparing the Office and Maintaining Safety**

- Does the office have a formal plan for maintaining a sanitary work environment?
- What guidelines are being used to maintain social distancing?
- What personal protective equipment (PPE) will be required and/or recommended for staff and membership?
- Are the expectations different for staff and members and has this been outlined?
- If members are wearing face coverings, or have a personal preference for wearing face coverings, how will the credit union verify their identity?

- Is there a written plan, communicated with members and staff, on how the credit union will be as “touchless” as possible?
- Has the credit union identified critical or essential third-party organizations or vendors that will need access to the credit union, and has it made those people aware of the credit union’s expectations for on-site safety?

### **Supplies**

- Disinfecting solutions
- Latex and non-latex gloves
- Face coverings
- Single-use paper toweling
- Hand sanitizer
- Acrylic barriers
- Social distancing markers
- Signage (see check list below)
- Facial tissues
- Additional wastebaskets

### **Signage**

- Has the credit union posted handwashing signs in restrooms and kitchens?
- Does the credit union have respiratory etiquette signs posted in conspicuous locations?
- Is there signage at the entrance advising members and staff to not enter the credit union if they are not feeling well or if they have a fever?
- Have signs regarding employment law been reviewed for compliance?
- Are these signs multilingual?

### **Engagement with the Staff**

- Does the staff understand the benefits that could be available to them during the crisis?

- Is the staff aware of the protocol if they are to become ill, or should they encounter a person that is ill (inside and outside the credit union)?
- What are the expectations/requirements that staff will need to adhere to for personal travel?
- Does the credit union have a plan to address employees' mental and physical health and shared the resources with the staff?
- Who should employees contact at the credit union with questions or concerns?
- Will staff be able to attend credit union-related functions, conferences, or other activities?
- Have employees been advised on what will happen should the credit union need to close again, or another safer-at-home advisory is issued?

### **Multiple Offices**

- Will the standards for all offices/branches be the same?
- Will employees return to the office at the same time, or will staff be staggered?
- Has the credit union considered the nuances of each municipality and county in their reopening plans?
- If one office has suffered from illness or community spread, how will this affect the operations at other offices and those employees?

### **Compliance Considerations**

- Are the protocols compliant within the Families First Coronavirus Response Act (FFRCA)?
- Has the credit union reviewed its Board approved policies regarding remote working, time off, accrual of vacation time, etc.?
- Is the credit union compliant with all human resources rules and regulations?
- Have unique considerations or instances been addressed with the Office of Credit Unions and/or NCUA?
- Has the Office of Credit Unions been notified if there has been a branch closure?
- Has your credit union rescheduled its Annual Meeting and has this been communicated with the membership?

## Communicating with Staff and Members

*Has the credit union identified reputable resources that will be relied upon for making decisions affecting operations?*

It is important that the credit union relies on organizations that can provide non-partisan, unbiased, fact-based solutions for helping in deciding when to open or close their operations. Many resources encourage decision makers to avoid information that appears to be an opinion, is not from a subject matter expert, or is not properly vetted.

Examples include: [Centers for Disease Control \(CDC\)](#), [Wisconsin Department of Health Services](#), [Local Public Health Departments](#), [Occupational Health and Safety Administration \(OSHA\)](#).

*Has the leadership identified the individuals that will address the concerns that may arise for members and/or staff? Has leadership outlined the talking points on how the credit union is addressing the COVID-19 pandemic? How will changes in operations be addressed with staff and members? Have the members been notified through various channels how the credit union is reopening and what protocols have been implemented?*

It is important that the credit union identifies the person/persons responsible for sharing information surrounding the pandemic. This ensures that the staff and the membership is getting their information from a single source at the credit union and this will reduce the opportunity for misinformation, or incorrect information.

It will be important for the leadership to have talking points ready for staff and the communications team if members have questions or if information needs to be shared on websites, social media, etc.

Signage and guidance in the office will be an important way to communicate your plans with your staff and members while they are in the office. More information is listed below.

*Are staff members aware of the cleaning, disinfecting, and sanitation plans for the offices?*

There are many resources that the credit union can rely on for information sanitation best practices. CDC, OSHA, WDHS, and local health departments have many resources to help, as do third-party vendors.

*How will staff members be scheduled in the office?*

Some credit unions have taken a staggered approach to staffing their offices. Some employees will continue to work remotely, and others will come back to the office. At other credit unions, the staff has been divided into teams to ensure that not all staff members are exposed to viral risks at the same time. It will be up to the individual credit

unions to determine what plan works best for their operations, but it is important that the plan is disseminated to the staff in a clear and concise manner.

## **Preparing the Office and Maintaining Safety**

*Does the office have a formal plan for maintaining a sanitary work environment?*

The credit union will need to consider a variety of issues with making sure that the offices are cleaned and disinfected. According to the [CDC](#), cleaning is defined as removing germs, dirt, and impurities from a surface. This is done by using soap or detergents along with water to physically remove the germs. Disinfecting kills germs on surfaces or objects. This is done by using chemicals to kill the germs, but does not necessarily clean the dirty surface, or remove the germs. It is important to do both cleaning and disinfecting.

A few other items to consider is that the credit union should have a schedule of when sanitation tasks are done, and by whom. Consider what supplies are needed to maintain a healthy office and have those readily on hand. Be sure to outline the expectations of how the office will be kept safe before, during, and after members and staff are present.

The credit union should also make sure their heating, ventilation, and air conditioning (HVAC) systems, along with their filtration, will not spread illness. Offices that have been vacant should be assessed for rodents and/or pests, mold growth, stagnant water, etc. CDC has [an office building](#) guide for best practices.

A sample list of supplies is listed on page two, and the CDC has provided [this list](#) to help with cleaning and disinfecting.

*What guidelines are being used to maintain social distancing?*

As offices reopen, it is important to be familiar with the [CDC's Social Distancing](#) guidelines and how they should be implemented in the office. Close contact should be limited in all cases, and especially in instances when people may interact with [people at higher risk](#). Many businesses have already marked the floor and/or workspace with social queues, such as markings on the floor, crowd control ropes, etc. It will be important to decide before reopening how this will be designed for members and staff.

Consider also how to maintain social distancing in office areas of the credit union, such as departments with shared workspaces, cubicles, and conference rooms. Ideally, social distancing doesn't just end in the lobbies of branches, but extends to ensure that people are maintaining a distance of six feet, at minimum.

*What personal protective equipment (PPE) will be required and/or recommended for staff and membership?*

Each organization will need to determine what products will be necessary to remain safe at their credit union. OSHA has [prevention guidance](#) on their website that covers PPE as well as other sanitation issues.

The credit union needs to outline their expectations for face coverings as well. According to the CDC, the guidance is that [it is recommended](#) to wear a face covering, even when asymptomatic, to prevent the spread of illness. It should also be determined if the credit union will expect and/or encourage members to wear a face covering in the building, when and how a face covering will be worn (only when interacting with others, in close spaces, etc.) and will it be the responsibility of the credit union or the staff member or membership to have a face covering.

Leadership also needs to understand and create a plan for staff members that cannot wear a face covering. According to the American Lung Association (ALA), COVID-19 is a lung disease, and those with pre-existing conditions are at higher risk. People suffering from asthma, chronic obstructive pulmonary disease (COPD), mobility issues, autism, and many other conditions, cannot wear face coverings because of the limitations of breathing. The ALA has a [lung health and COVID-19 page](#) that can help assist those suffering from compromised breathing and help employers in making their workplace decisions. Employers are encouraged to work with these employees to continue to work remotely and limit their contact with others.

*If members are wearing face coverings, or has a personal preference for wearing a face covering, how will the credit union verify their identity?*

Several credit unions around the country have noted on their website how they will be working with members as they enter the office while wearing a face covering. Some credit unions will have a staff member greeting members at the door, and this is where they will verify their identity (as well as reminding members if they do not feel well to use the drive-up), and other credit unions are asking members to briefly remove their mask inside the office so the security systems can notice their presence.

It will be up to each credit union to determine how best to identify their members, but make sure that the direction is clear to both staff and members so there is no confusion.

*Is there a written plan, communicated with members and staff, on how the credit union will be as “touchless” as possible?*

Here are several items to consider in reducing the number of touch points in the credit union:

Will pens be single-use, or disinfected after each member uses them?

Have staff and members been reminded to not touch their faces?

How will currency be handled hygienically? Some people wet their fingertips before counting cash. This should be strongly discouraged.

How will the signing and sharing of paper documents be handled?

Will member contact areas be cleaned and disinfected after each interaction, such as teller windows, member service desks, reception areas, etc.?

Will restrooms be restricted and only used for emergencies, and how will those rooms be sanitized after use?

Have stairwells (if applicable) been designated for one-way traffic, for example one flight for going up, and another flight for going down? Be sure to check with local fire officials to ensure compliance with local fire safety rules.

Have capacity restrictions been placed on elevators? How will elevators be sanitized?

How will interactive teller machines (ITMs), automated teller machines (ATMs), self-service coin counters, touch screens, handrails, countertops, signature pads, etc., be sanitized? It is important to reach out to the vendors for best practices on cleaning and disinfecting these products. Some products can damage these items, and members should be discouraged from “cleaning” these devices with their own supplies.

*Has the credit union identified critical or essential third-party organizations or vendors that will need access to the credit union, and made those people aware of the credit union’s expectations for on-site safety?*

Some vendors, such as security or IT, may need to make a in-person visit to the credit union. Before they arrive, they should be made aware of how the credit union is addressing the pandemic, and what the expectations are for their visit (face coverings, normal body temperature, etc.). Other vendors or visits may not need to happen in-person and can be done remotely. Examples may include, auditors, salespeople, marketers, etc.

## **Supplies and Signage**

As your credit union moves to reopening, it is important to determine that there are enough supplies on hand to make a safe work environment. The CDC has this [landing page](#) that can help determine what is needed for supplies and how to keep the office safe.

[Local health departments](#) have signs and materials that can be printed and hung in offices to help remind members of covering coughs and sneezes, reminding people to wash their hands, and how to report signs and symptoms of illness. Make sure to review your community’s website for more information, and if your local or county office does not have signs to print, look at the health departments in larger communities for more resources.

It is also important to have signage in your office in languages your members can understand. Determine if it is necessary to have signs in Spanish, Hmong, or other languages.

## **Engagement with the Staff**

*Does the credit union understand the benefits that could be available to them during the crisis? Does the credit union have a plan to address employees' mental and physical health and shared the resources with the staff?*

Each credit union will need to determine what is available to their staff during this crisis. Some credit unions have low- and no-interest lending products that can help their staff during this time. Retirement plans may have ways for staff to borrow money during the crisis. Many health insurance providers have resources that can help with physical and mental health needs. Additional resources that might be beneficial to your staff members are [The National Alliance on Mental Illness](#), [Yale Medicine](#), and local health care providers and medical groups.

The credit union should also determine what considerations are being made for families that are educating school-age children in the home, may not have daycare options because of daycare closures, or may be caring for higher-risk family members, or aging family members. Will these staff members be able to continue to work remotely, or can other considerations be made?

*What are the expectations/requirements that staff will need to adhere to for personal travel? Will the staff be able to attend credit union-related functions, conferences, or other activities?*

The CDC has created [an FAQ resource](#) to help facilitate the conversation with staff regarding travel, whether it's for leisure or to visit relatives, or by ground or air transportation. Determine if you will be requiring staff to self-quarantine after travel, and what kinds of travel will prompt that action. If you will be requiring self-quarantine, will the staff be paid, can they work from home, will they need to take vacation and/or sick time? Make sure to outline this ahead of time to avoid questions and confusion.

Many organizations have limited business travel for a period of time during the pandemic. Make sure that staff members understand the expectations of the credit union for attending in-person events, and if and when those decisions may change.

*Is the staff aware of the protocol if they are to become ill, or should they encounter a person that is ill (inside and outside the credit union)? Have employees been advised on what will happen should the credit union need to close again, or another safer-at home advisory is issued? Who should employees contact at the credit union with questions or concerns?*

Will the credit union have a single point person that will handle COVID-19-related issues, or should staff discuss issues directly with their supervisor? Reports have circulated that there could be a second wave of infection as the year goes on. If this



happens, how will the credit union respond? Will the actions be similar for the second time as they were the first time, or will adjustments be made?

Leadership should also decide on what will happen if a staff member tests positive and has had contact with members and other staff. Will the office be closed, and will all staff be required to self-quarantine? How will the office be sanitized, and should an outside company be hired?

## **Multiple Offices**

If protocols for reopening, closing, and appointments are different between offices, be sure that this is communicated with staff and members. Be sure to review the reopen and COVID-19 response plans for each community in which the credit union has an office. These vary by municipality and county. Additional research should be done if the credit union has offices in other states.

## **Compliance Considerations**

*Are the protocols compliant with the Families First Coronavirus Response Act (FFCRA)?*

The FFCRA includes several HR provisions related to leave during the COVID pandemic. For information, see these Compliance Couriers:

- [HR guidance during the COVID-19 pandemic](#) (3/25/2020)
- [DOL: Guidance on COVID-19 leave and new required poster](#) (3/27/2020)

*Has the credit union reviewed its Board-approved policies regarding remote working, time off, accrual of vacation time, etc.? Is the credit union compliant with all human resources rules and regulations?*

Credit unions are encouraged to work with an experienced employment law attorney, who can offer guidance tailored to its unique circumstances. An attorney can help draft effective HR policies and employee handbooks, as well as offering insights on the ever-changing requirements of employment law.

*Has your credit union rescheduled its Annual Meeting and has this been communicated with the membership?*

The Office of Credit Unions has released guidance, explaining that credit unions can conduct their annual meetings remotely. They may also postpone meeting beyond the usual July 1 deadline – so long as they inform the OCU (in writing) and indicate the new date (if one has been set). See this [March 19, 2020 Compliance Courier](#) for details.

## **Additional Resources**

[Centers for Disease Control \(CDC\) - COVID-19](#)

[Occupational Safety and Health Administration \(OSHA\) - COVID-19](#)

[Wisconsin Department of Health Services - \(DHS\) - COVID-19](#)

[Wisconsin's Badger Bounce Back Plan](#)

[Wisconsin's Local Public Health Departments](#)

CUNA Mutual Group – Branch Reopening Playbook (PDF)

[Wisconsin Credit Union League - COVID-19 Resources](#)

[Wisconsin Credit Union League - Compliance Couriers](#)

[CUNA - COVID-19 Resources](#)

[National Credit Union Administration \(NCUA\) - COVID-19 Resources](#)

[Wisconsin Office of Credit Unions - COVID-19 Resources](#)

CDC – Workplace Decisioning Tree (PDF)

CDC – Resuming Business Toolkit (PDF)

OSHA – Guidance on Preparing Workplaces for COVID-19 (PDF)

National Alliance on Mental Illness (NAMI) – COVID-19 Resource and Information Guide (PDF)

Wisconsin Safety Council – Returning to Work; 8 Steps to Keeping Employees Safe (PDF)