You face unique challenges creating and maintaining a safe workplace for your staff and your customers in our current environment. This document has been compiled from information from multiple documents, webinars and websites and is intended as a guide to assist with the transition to re-opening your bank and branches and bringing staff back to the workplace. The information contained should not be considered legal advice and we recommend you consult with your attorneys and health advisors with any questions.

Each bank faces unique challenges and must develop a plan that fits their own unique circumstances and market. If your bank is in a designated "hot spot" you will need to be extra cautious and perhaps delay re-opening.

Please note that according to the State of Michigan EO 2020-96, each company should have a Preparedness Response Plan in place and a copy kept at the bank headquarters. Keep in mind this is a fluid document that will need to be modified as additional staff are brought back to the worksite. In EO 2020-97, specific guidelines are given regarding safety guidelines for businesses as they re-open and Executive Directive 6 announces the appointment of Director of COVID-19 Workplace Safety to foster compliance. If any of the requirements are violated, it is considered by OSHA to be an unsafe work environment and subject to enforcement action and administrative review.

You should form a back to work committee (Pandemic Response Team) and that committee/team should include members of management, human resources, site coordinator(s) and perhaps a health professional/consultant.

Requirements Outlined in EO 2020-97
Per the State of Michigan Executive Order 2020-97, all business or operations that require their employees to leave their homes or residences for work must at a minimum do the following:
- Develop a COVID-19 Preparedness and Response Plan consistent with the OSHA guidelines available here. This must occur no later than June 1 or within two weeks of resuming in-person activities. This plan must be made available to employees and customers via website, intranet or hard copy.
- Designate one or more worksite supervisors to implement, monitor and report on the COVID-19 control strategies listed in the first bullet and the supervisor must remain on-site at all times when employees are present on site.
- Provide COVID-19 training to employees (and maintain a record of that training) that at minimum covers the following:
  o Workplace infection-control practices
  o Proper use of personal protective equipment (PPE)
  o Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
  o How to report unsafe working conditions.
- Conduct a daily entry self-screening protocol for all employees or contractors entering the workplace including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19. You must maintain a record of self-screenings.

- Keep everyone on the premises at least six feet from one another including through use of ground markings, signs and physical barriers as appropriate.
- Provide non-medical grade face coverings to employees.
- Require face coverings to be worn when employees cannot consistently maintain six feet of separation from other individuals and consider face shields when three feet of distance cannot be maintained.
- Increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (e.g. door handles), paying special attention to shared equipment.
- Adopt protocols to clean and disinfect the facility in the event of a positive COVID-19 case in the workplace.
- Make cleaning supplies available to employees upon entry and at worksite and provide time for employees to wash hands frequently or use hand sanitizer.
- When an employee is identified with a confirmed case of COVID-19, you must notify the following within 24 hours and maintain a record of this requirement:
    - Local public health department and
    - Any co-workers, contractors or suppliers who may have come into contact with the employee.
- An employer will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the Centers for Disease Control and Prevention ("CDC").
- Discharging, disciplining or otherwise retaliating against employees who stay home or leave work when they are at risk of infecting others is prohibited (see EO 2020-36).
- Establish a response plan for dealing with a confirmed workplace infection to include protocols for sending employees home and temporary closures for deep cleaning.
- Restrict business-related travel for employees to essential travel only.
- Encourage employees to use PPE and hand sanitizer on public transportation.
- Promote remote work to the fullest extent possible.
- Adopt any additional infection-control measures that are reasonable to the work performed at the worksite and the rate of infection in the surrounding community.

Certain other additional steps that are specific to retail stores (retail guidance may be helpful with bank lobbies) and offices that are required in this order include the following:

Retail Stores:
- Create communications materials for customers to inform them of changes in store practice and explain the precautions the store is taking to prevent infection.
- Establish lines to regulate entry with markings for patrons to enable them to stand at least six feet apart while waiting. Explore alternatives to lines such as having customers wait in their cars for a text message or phone call to enable social distancing and accommodate seniors and those with disabilities.
- Limit the number of customers in the store (excluding employees) to 4 people per 1,000 SF of customer floor space.
- Post signs at entrance(s) instructing customers of their legal obligation to wear a face covering when inside.
- Post signs at entrance(s) informing customers not to enter if they are or have recently been sick.
- Design spaces in a manner that encourages employees and customers to maintain six feet of distance.
- Install physical barriers at service points that require interaction including plexiglass barriers, tape markers or tables as appropriate.
- Establish an enhanced cleaning and sanitizing protocol for high-touch areas like restrooms, counters, keypads and other surfaces.
- Train employees on:
    - Appropriate cleaning procedures, including between customers.
    - How to manage symptomatic customers upon entry or in the store.

Offices:
- Assign dedicated entry point(s) for all employees to reduce congestion at the main entrance and provide visual indicators of appropriate spacing outside the building in case of congestion.
- Require face coverings in shared spaces, including during in-person meetings and in restrooms and hallways.
- Take steps to reduce entry congestion and ensure the effectiveness of screening (e.g. staggering start times, adopting a rotational schedule where only half of employees are in the office at a particular time).
- Increase distancing between employees by spreading out workspaces, staggering workspace usage, restricting non-essential common space (e.g. cafeterias), providing visual cues to guide movement and activity (e.g. restricting elevator capacity with markings, locking conference rooms.
- Turn off water fountains.
- Prohibit social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office.
- Provide disinfecting supplies and require employees wipe down their workstations at least twice daily.
- Post signs on the importance of daily hygiene.
- Disinfect high-touch surfaces in offices (e.g. whiteboard markers, restrooms, handles) and minimize shared items when possible (e.g. pens, remotes, whiteboards).
- Institute cleaning and communications protocols when employees are sent home with symptoms.
- Notify employees if employer learns that an individual (including a customer, supplier or visitor) with a confirmed case of COVID-19 has visited the office.
- Suspend all nonessential visitors.
- Restrict all non-essential travel, including in-person conference events.

Additional Information in EO 2020-96
- Face coverings are specifically addressed in number 15 in the EO stating:
  - Any individual able to medically tolerate a face covering must wear one over his or her nose and mouth when in any enclosed public space.
  - An individual may be required to temporarily remove a face covering upon entering an enclosed public space for identification purposes.
  - All businesses and operations whose workers perform in-person work must, at a minimum, provide non-medical grade face coverings to their workers.

Before Re-Opening – Supplies
- Have PPE supplies on hand and maintain the recommended amount of supplies. Recommended supplies include:

  - Infrared thermometer (1 per 100 employees per shift)
  - Hands-free hand sanitizer dispenser floor stand (1 per work area per 50 employees)

  - 30-day supply minimum of the following:
    - Disposable surgical masks (1 per day)
    - Nitrile gloves (for cleaners only)
    - Disinfectant spray/wipes
    - Hand sanitizer refills
    - Paper towels
    - Face shields (if working within 3 feet of another employee)

- Gloves are not recommended for general use as they create a false sense of security for the wearer and may create more face touching. Frequent handwashing and/or using hand sanitizer is better for most situations. Gloves are appropriate for employees who handle large amounts of cash or coin.
- Keep a log of your supplies on hand. Keep track of usage and how frequently you need to reorder so that you can set a schedule for replenishment.
- Our preferred partner, Spry, has access to many of these items. The Michigan Chamber of Commerce also has links on their website to companies offering PPE and SBAM offers PPE for purchase to members only.
- If you have trouble procuring PPE, be sure to document your efforts in your Preparedness Plan. For example, keep a record of masks that have been ordered but not yet delivered.

Before Re-Opening – Employees
- Cross-train employees following reopening to prepare for a future wave or pandemic.
- Create a training plan for employees, instructing them on the safety measures you are implementing, what to do if they are sick or have a sick person in their household and what they can expect on their return. In addition the training MUST include proper use of PPE, what steps an employee must take to notify the employer of any COVID-19 symptoms, suspected/confirmed COVID-19 and how to report unsafe working conditions. Employee acknowledgement of this training MUST be documented. Ensure your employees know who their designated COVID coordinator is for each location and each shift. Depending on the size of your institution, this may mean multiple coordinators on multiple floors or departments.
- Send a clear, consistent message to your team, and communicate your plan as soon as you can. Communicate regularly with your employees and get a rhythm or schedule to your communication so it is consistent.
- Communicate your plan with employees prior to return to work to set a foundation for new ways of working and protecting themselves and their families.
- Remind employees of proper hygiene etiquette, especially for covering coughs and sneezes and hand washing.
- Consider bringing back a limited number of employees initially to ensure social distancing can be met.
- Be sure to include all ages and protected classes when only partially re-staffing to avoid an ADA complaint. Consider bringing back all of a certain employee category, such as loan officers or tellers to ensure all employees are treated equally.
- Determine what you will do if an employee tells you they do not feel comfortable returning to work, document and include in your Plan. Certain employees may use this excuse if they are making more on unemployment than they would if working.
- Be mindful of litigious people. Ensure all employee concerns, questions, issues, etc. are thoroughly documented and as appropriate, addressed. Communicate this requirement with all bank management.

Before Re-Opening – Workspaces
- Create an employee density map to identify the maximum number of employees per workplace area.
- Determine the number of people who can safely be in break/lobby areas and consider putting up a maximum capacity sign.
- Arrange desks and cubicles to ensure social distancing is achieved. They should not face each other if at all possible. If not possible, install protective screens and have employees wear masks. You can find screens through our preferred partner Spry and also through our new associate member Clear Fortress.
- Physical barriers should be installed if the workers cannot be 6 feet apart. This would include cubicles, teller windows, loan officer desks, etc. These barriers should be cleaned frequently throughout the day.
- Meeting spaces should be organized in advance to hold no more than 10 chairs and those chairs should be spaced 6 feet apart in accordance with the State of Michigan's re-opening plan. If this is not possible, lock the meeting space. Virtual meetings should be encouraged.
- Customer waiting or seating areas should be reconfigured to ensure physical distancing standards are achieved. You may wish to consider removing soft and porous materials from your waiting areas such as rugs and fabric

chairs that are more difficult to disinfect. Carpets should also be cleaned and disinfected if appropriate products are available.

- Posters must be displayed reminding employees and customers about personal hygiene.
- Be sure the latest required worksite posters are displayed. Some have been developed specifically to address COVID-19 and employee rights and can be found at the [Department of Labor website](#).
- Consider reconfiguring employee locations so functions and departments are not all seated together to minimize the risk of critical banking functions being impacted.
- Contact your HVAC maintenance company to see if there are options to increase air flow in the building.
- Develop a plan for safety deposit box areas to possibly include extra safety measures as these are generally smaller spaces.
- Identify and address any potential language and cultural barriers. It may be necessary to have any signs you post available in other languages. Adding graphics or photos to the signs depicting new procedures may be useful.
- Per the CDC, if an area has been unoccupied in the last 7 days, it only needs to be cleaned, NOT disinfected.

After Opening – Employee Welfare

- Invest in your team's mental health and be understanding of individual situations. Some employees may be grieving, caring for a love one, or struggling with childcare. Engage your employee benefits partner and provide EAP plan information and other support sources for additional employee assistance.
- Solicit feedback from employees before, during and after the plan has been implemented.
- Encourage employees to have a Preparedness Response Plan in place for their families. It is important for them to know what to do in the event a child or elderly parent falls ill, or how to plan in the event schools and childcare centers remain closed.
- Be visible to employees and check in regularly with them.
- Know what your employees want to hear from you - they want to know you intend to keep them safe.
- To best support your message to your employees, leverage data and examples from subject experts.
- Motivate and inspire your employees through gratitude and recognition. Call out employees who served their community during the crisis.
- Consider bringing in a health expert/consultant to address your employees through a virtual meeting.
- Continue to remind employees of proper hygiene etiquette, especially for covering coughs and sneezes and hand washing.
- Get comfortable with being slightly uncomfortable. The new normal looks nothing like the old normal.

Employee/Customer Safety in the Workplace

- Per the Governor's executive order, masks must be worn when in any enclosed space. CBM is working with the Governor's office to determine a way to maintain the safety and security of branches and still comply with the executive order. Our suggested language: If requested, an individual may be required to temporarily remove a mask for identification purposes per your bank's customer identification program. We need to keep branches safe from robberies as well as COVID-19.
- If a customer refuses to remove their mask, you have the right to refuse service and ask them to leave the premises.
- Allow employees additional break time so they can wash their hands and wipe down their work areas frequently.
- Sanitize all high touch areas frequently. Such areas include but are not limited to door handles, counters, railings, elevator buttons in the common areas and phones, copiers, coffee pots, keyboards, mice, desks and cubicle walls in workstations.
- If able, leave doors open to reduce touching by multiple people and open windows to improve ventilation.
- Place touchless hand sanitizer stations throughout the workspace and common areas.
- Consider having employees eat in their workstations to avoid the common areas.

- If employees must eat in a break room, set a schedule so it can be done while still maintaining the 6 foot social distancing space.
- Place marks 6 feet apart on the floor in your lobby areas so customers know where to stand.
- Avoid taking papers directly from a customer or co-worker to maintain the 6 foot distance. Have the customer or co-worker place them on a surface, back away, and then pick up.
- Follow OSHA guidelines. You must provide a workplace free from recognized hazards that are causing, or are likely to cause, death or serious physical harm to employees regardless of the size of the business.
- If you have an employee who cannot wear a mask for medical reasons consider moving them to a position where exposure is limited such as an office or have them work remotely. Alternatively, consider trying to accommodate the employee by asking if they would be comfortable with a face shield or scarf.
- Try to limit exposure to those employees in the high-risk categories.
- Limit staffing to only those necessary, allowing those who can still work from home to do so.
- Some employers are having all employees tested for COVID-19. There are pros and cons to this approach. You should monitor testing developments to determine if/when testing might be appropriate.

Screening Employees/Customers
- Ask employees to self-screen in the morning before leaving for work. Have them take their temperatures daily. This is done to prevent employees who may be sick or show symptoms of COVID-19 from spreading the virus throughout the workplace.
- On-site daily screenings must be done and documented for all employees, contractors and suppliers before accessing company facilities/office. Consider screening customers and visitors also. Examples of screening forms can be found at Ingham County Health Department, Ionia County Health Department and SHRM websites. You should also check your County's Health Department website.
- Each employee, customer, etc. should have their temperature taken with an infrared thermometer and be asked if they have any of the following symptoms as published by the CDC:
  o Cough
  o Shortness of breath and or difficulty breathing
    OR any two of the following symptoms:
    - Fever
    - Chills
    - Repeated shaking with chills
    - Muscle pain
    - Headache
    - Sore throat
    - New loss of taste or smell
    - Diarrhea
- In addition, per the Governor's Executive Order screening must also include:
  o Did the person have any close contact in the last 14 days with someone with a diagnosis of COVID-19
  o Did the person travel outside of Michigan in the last 14 days (Applicable in only certain counties)
- We recommend checking with your county's health department for any additional screening requirements or questions that are county specific and modifying your workplace screening form accordingly.
- If the person's temperature is 100.4 degrees or higher or there are visible symptoms of illness consistent with COVID-19 the person should not be allowed at work and should seek medical testing/treatment.
- A sample self- screening form can be found at the back of this document. This may need to be modified based on your local County requirements.
- Per the Governor's EO, a screening form MUST be completed every day for employees and kept on file in a separate, locked location. This can be done electronically as well, but records of such must be kept. This

protects employers from potential future workers compensation claims and legitimizes your Preparedness Response Plan.

- <mark>Your bank may have additional policies in place regarding travel outside Michigan and COVID-19 quarantine and if so, this should be included in your screening form as well.</mark>

What to do when an employee exhibits symptoms and/or has a confirmed COVID-19 diagnosis:
- If an employee self-screens and reports symptoms to the COVID-19 on-site coordinator, they should stay home for a minimum of 7 days or 48 hours after a fever resolves without medication. This should be documented.
- If an employee meets any of the criteria on the worksite screening form they should immediately be sent home and follow the guidance above. This should be documented.
- If an employee has a positive COVID-19 test, the following steps should be taken within 24 hours of notification:
  - Notify the local health department. This is mandatory.
  - Without revealing the infected employee's identity, high risk and medium risk employees should be notified, in writing (letter or email) with a copy kept by the bank.
  - Any employee who had sustained close proximity (less than six feet for 10 minutes or more) should immediately be sent home and asked to monitor their symptoms and self-quarantine for a minimum of 7 days. The employees should notify HR if any symptoms develop. These employees should still continue to work remotely if possible.
  - Identify and notify any other employees, contractors, etc. who may have come in to contact with the infected employee to self-screen daily and notify HR if symptoms develop. This is required.
  - Have the work area and any additional common areas the infected employee may have touched deep cleaned and disinfected.
- Banks/Employers are not obligated to identify and notify customers who may have been exposed. If you choose to notify customers, be consistent in your approach.
- Ensure proper documentation of all steps taken.
- Encourage employees to notify HR if they observe another employee exhibiting symptoms. That employee should perhaps be taken to a designated private room, be screened for symptoms and the appropriate action taken based on the results.
- Follow your HR policies regarding requiring a doctor's note to return to work.
- Ensure screening and subsequent actions are consistent companywide.

Preparedness Plan Document
- Maintain a plan at headquarters.
- The plan must be consistent with recommendations in OSHA's Guidance on Preparing Workplaces for COVID-19 found [here](#).
- This plan must be readily available to employees, labor unions and customers via website, internal network or by hard copy. It must be completed by June 1, 2020 or within two weeks of resuming in-person activities, whichever is later. It is recommended that if shared with employees have them sign an acknowledgement of receipt.
- Be sure to follow everything in the Plan to protect from workers comp claims, especially if you determine to share the plan with all employees.
- Designate one person at each location for each shift to be the contact person for COVID-19 issues. This person may also handle the pre-work screening.
- Should include considerations for both facilities and employees.
- Describe enhanced cleaning measures to be taken by the employer, employees and contractors including what to do in case of a confirmed or suspected COVID-19 case in the workplace.

- Include procedures for screenings and what steps will be taken in the event of a suspected or confirmed COVID-19 case.
- Determine how to address employees who may refuse to return to work for reasons such as fear, illness, childcare situation, underlying health conditions, sick family member they are caring for, vulnerable household member, etc.
- Create a process for how you will handle mail and deliveries, including your suppliers and vendors. Keep in mind they may also have set procedures in place and coordinate with those as well.
- Ensure your vendor management is properly categorized and analyzed to determine if there is a risk to the banks should the vendor face financial hardship or have a disruption in work procedures.
- Ensure your plan includes your procedures for a resurgence or additional "waves" of COVID-19. Identify the triggers for implementing your plan and determine what additional supplies you need on hand.
- Identify a staff member to monitor advisories from this CDC, COVID-19 Taskforce, Executive Orders, County and State Health Departments, etc. This person should communicate with or could also be your COVID-19 contact person. This individual should be familiar with the day to day operations of the company.
- Your pandemic team should have quick, 5-minute huddles daily.
- Review your Pandemic Response Plan monthly and continue to do so after this pandemic resolves.
- Participate in community drills for stockpile distribution, community pandemic influenza planning & exercises. Be prepared for the next wave or pandemic.
- This is a fluid document and should be revised as often as necessary to remain current with updated guidance from the state and federal levels.

COVID-19 Workplace Screening

Employee Name: _____

Date: _____   Time: _____

Current Temperature: _____

If temperature is 100.4° or higher, the employee must leave the workplace immediately and follow self-quarantine guidelines below.

In the past 24 hours have you experienced any of the following symptoms:

Subjective fever (felt feverish):   ☐ Yes   ☐ No

New or worsening cough: ☐ Yes   ☐ No

Shortness of breath: ☐ Yes   ☐ No

Sore throat: ☐ Yes   ☐ No

Diarrhea (unless due to a known cause):   ☐ Yes   ☐ No

If the answer is "**yes**" to any of the symptoms listed above, or your temperature is 100.4° F or higher, please do not go into work. Self-isolate at home and contact your primary care physician's office for direction. Before returning to work:

- You should isolate at home for minimum of 7 days from onset of symptoms.
- You must also have 3 days without fever (without the assistance of medication) and improvement in respiratory symptoms.

In the past 14 days have you:

Had close contact with an individual diagnosed with COVID-19?   ☐ Yes   ☐ No

Travelled outside of Michigan? (Applicable in only certain Counties)   ☐ Yes   ☐ No

If you answer "**yes**" to either of these questions, please do not go into work. Self-quarantine at home for 14 days.

COVID-19 Reopening Checklist

Date: _____   Completed by: _____

☐ Preparedness Response Plan is on file at bank headquarters
☐ PPE supplies are stocked and ready to distribute
  o If unable to acquire certain items, document in your Plan
☐ Worker screening checklist is printed and ready to implement
☐ Screening station set up at entrance
  o Screening checklist
  o Writing instruments
  o Thermometer
  o Hand sanitizer
  o Masks/face shields/plexiglass barrier
☐ Employees have been informed of:
  o Protections bank has put into place for employees
  o What is expected of them in the new environment
    ▪ Handwashing/use of hand sanitizer
    ▪ Disinfecting work areas frequently
  o How to pre-screen daily at home and how to proceed with reporting symptoms
  o What screening will take place on-site and actions that will be taken if symptoms develop
  o Where to go/who to reach out to if employees need mental/emotional assistance related to COVID-19
☐ Signage has been placed
  o Mask requirements
  o Handwashing (especially in restrooms and break areas)
  o Social distancing (could include marks on the floors 6 feet apart)
  o Cough/sneeze etiquette
☐ Staff coordinator(s) have been identified to employees
☐ Staff assigned to wipe frequently touched surfaces not in immediate work area including time clock if applicable
☐ Policies and procedures in place for identifying, isolating and reporting any ill employees
☐ New state and federal guideline posters are in place
☐ Update website, social media to indicate any changes in hours. Consider exterior signage of same.
☐ Employee handbook/manual is updated to include new procedures/policies
☐ Cleaning and disinfecting (if necessary) of the bank prior to opening
☐ Disinfection plan is in place in case of infection
☐ Workspaces have been modified to accommodate 6 foot social distancing where possible
☐ Hand sanitizer and/or handwashing stations have been set up for both employees and customers
☐ Procedures are in place in the event of an infection in the workplace
  o Notification of the local public health department
  o Notification of affected employees, contractors and suppliers
  o Sanitizing work area
  o Potentially re-closing lobbies

Suggested Resources:

Lear has created a [Safe Work Playbook](https://playbook.lear.com/Safe%20Work%20Playbook%202nd%20Edition.pdf) they are sharing and inviting others to use as appropriate. https://playbook.lear.com/Safe%20Work%20Playbook%202nd%20Edition.pdf

Small Business Association of Michigan (SBAM): https://www.sbam.org/Resources/COVID-19-Resources/Get-Back-to-Work-Safely-Tips-and-Resources

State of Michigan: https://www.michigan.gov/Coronavirus

Centers for Disease Control (CDC): https://www.cdc.gov/coronavirus/2019-ncov/index.html

CDC Guidance for Cleaning & Disinfecting: https://www.cdc.gov/coronavirus/2019-ncov/community/pdf/Reopening_America_Guidance.pdf

OSHA Guidance on Preparing Workplaces for COVID-19: https://www.osha.gov/Publications/OSHA3990.pdf

World Health Organization (WHO): https://www.who.int/emergencies/diseases/novel-coronavirus-2019

Michigan Department of Labor: https://www.dol.gov/general/topics/posters

Michigan Chamber of Commerce: https://www.michamber.com/coronavirus-toolkit

Protective Equipment Resources:

Spry: https://spryppe.liftoff.shop/

Clear Fortress: https://clear-fortress.com/product/clear-fortress-barrier/

Michigan Chamber of Commerce: https://www.michamber.com/coronavirus-toolkit

SBAM: https://www.sbam.org/Resources/COVID-19-Resources/Personal-Protective-Equipment-Resources

Sample Screening Forms:

Ingham County Health Department:
http://www.hd.ingham.org/Portals/HD/Home/Documents/cd/coronavirus/ICHDWorkHealthScreening2.pdf

Ionia County Health Department: https://ioniacounty.org/wp-content/uploads/COVID-19-Workplace-Checklist-and-Health-Screening.pdf

SHRM: https://www.shrm.org/resourcesandtools/tools-and-samples/hr-forms/pages/covid-19-employee-health-screening-form.aspx