

## A much different threat profile now



COVID-19 has led to a quicker adoption & plans to embrace:

- Digital technology
- Remote work arrangements & flexibility
- Branch re-configuration

However, it's more good old-fashioned response to behavior. This crisis highlights how important digital capabilities and product access are, and how important speed and seamless integration are.

Branch locations definitely still play important roles from an advice and complex transaction perspective.

Jim Bullard Senior Risk Consultant **CUNA Mutual Group** 





What risks do we need to think about in an extended scenario (up to six months)?

Life after COVID-19

#### Return-to-Work exposures



Negligent supervision / management centering on safety

Exposure to virus

Refuse to return to work for health or safety reasons

Wrongful termination related to whistleblowing, safety & FFCRA conditions

Discrimination claims relating to hiring or re-hiring; and disability accommodations

Avoid future disruptions

Written administrative policy controls as well as other mandated practices are critical

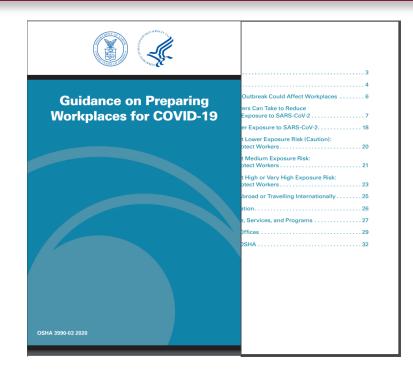
#### Comply with federal, state & local government orders

- Monitor the lifting of government Shelter-in-Place
   Orders to determine appropriate time frames, and phases for returning to work
- 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 and specific conditions and limitations may pertain to credit unions within their borders
- Carefully review state- and locality-specific orders.
- Consult with legal counsel when questions arise



### CDC Interim guidance – changes as of May 6,2020

- Conducting daily health checks
- Conducting a hazard assessment of the workplace
- Encouraging employees to wear cloth face coverings in the workplace, if appropriate
- Implementing policies and practices for social distancing in the workplace
- Improving the building ventilation system
- A table outlining the engineering controls, administrative controls, and personal protective equipment (PPE) that employers may use to help prevent the spread of COVID-19 in the workplace



https://www.osha.gov/Publications/OSHA3990.pdf

# Hazard assessment of the workplace

Risk Assessment by Population of Employees/Customers/Visitors		
Risk Consideration	Risk Mitigation Strategy	Risk Level
Are employees at a higher risk for serious illness, such as older adults (65 and older) or people with chronic medical conditions?	<ul> <li>Actively encourage sick employees to stay home. Employees with COVID-19 symptoms (i.e., fever, cough, or shortness of breath) should be advised to stay home;</li> <li>Communication about risk to staff/clients should be emphasized;</li> <li>Encourage the use of individual measures such as frequent hand hygiene, social distancing, respiratory etiquette and staying home when ill;</li> <li>Consider minimizing face-to-face contact between these employees or assign work tasks that allow them to maintain a distance of six feet from other workers, customers and visitors, or to telework if possible.</li> </ul>	High
Have employees recently traveled or attended an identified risk setting (e.g., conference where cases were known to be present)?	<ul> <li>The United States Department of State has initiated a Level 4 Global Travel Advisory. This advisory discourages United States citizens from all international travel. International business travel should be suspended until further notice.</li> <li>Domestic travel should be limited and destinations where COVID-19 is spreading rapidly should be avoided. Non-essential business travel should be avoided. Please see the <u>Department of Health's Travel Information</u> website for more information about travel restrictions and guidance.</li> <li>If an employee has had close contact with another person who has been diagnosed with COVID-19 while traveling, the exposed employee should quarantine at home for 14 days.</li> </ul>	High
Has an employee tested positive for COVID-19?	<ul> <li>If an employee tests positive for COVID-19, close contacts of the employee should be notified, but the identity of the person who may have exposed them should not be shared.</li> <li>Return to work guidance for an employee diagnosed with COVID-19 that does not work in a healthcare setting:         <ul> <li>Stay home for at least seven days after you are tested AND wait until the employee is fever free for 72 hours;</li> </ul> </li> </ul>	High

https://www.health.pa.gov/topics/Documents/Diseases%20and%20Conditions/COVID-19%20Business%20Risk%20Assessment%20Tool.pdf



#### **COVID-19 Statements**

Separate from the approval of this position document, ASHRAE's Executive Committee and Epidemic Task Force approved the following statements specific to the ongoing response to the COVID-19 pandemic. The two statements are appended here due to the unique relationship between the statements and the protective design strategies discussed in this position document:

**Statement on airborne transmission of SARS-CoV-2:** Transmission of SARS-CoV-2 through the air is sufficiently likely that airborne exposure to the virus should be controlled. Changes to building operations, including the operation of heating, ventilating, and air-conditioning systems, can reduce airborne exposures.

Considerations for ventilation systems

https://www.ashrae.org/file%20library/about/position%20documents/pd\_infectiousaerosols\_2020.pd

# **Hierarchy of Controls**







Engineering

Personal Protective Equipment

## Prepping the branch, staff and members



#### **Space Configuration**

- Space configuration to allow for 6' separation
- Transition employees back with continued remote work
- Acrylic partitions that allow for visibility & conversation while providing separation
- Consider lobby, drivethrough, and back office operations
- Meetings & meeting rooms



#### **Office Hygiene**

- Door handles cleaning / adhesive push pads
- Surface mats for high-touch areas
- Touchscreen overlays tablets, printers, ATMs, monitors
- Cannister wrap for drive-up pneumatic carriers
- Sanitation stations with wipes and/or hand sanitizer



# **Health-conscious** messaging

- Use of masks, face covers, sanitizing
- Serving members with masks, face covers, etc.
- Social distancing floor markers
- Behavior reminders
- Reporting procedures
- Privacy issues

#### Pay special attention to providing service to members, community groups, and employees

- Children's areas
- Community rooms / meeting space
- Onsite daycare
- Fitness facilities / workout classes

If you must open access, it is important to emphasize:

- Safe spacing
- Limiting number of individuals
- Use of masks and sanitation stations
- Enhanced cleaning schedules

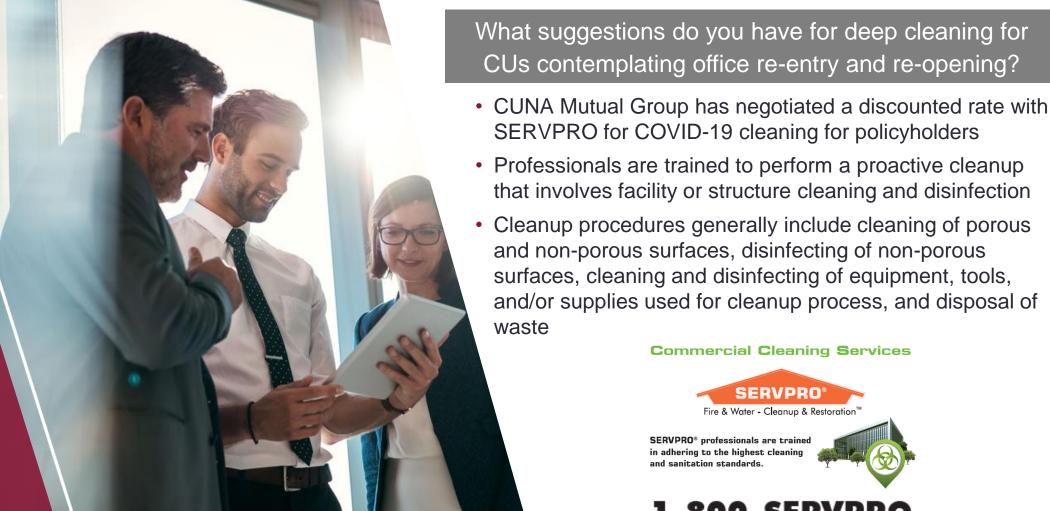








Multi-Uses at Credit Union offices







# Face coverings increase robbery risk

Credit unions should not prohibit the wearing of face masks. Encourage members to use online banking, ATMs, ITMs and drive-throughs if entry into the office is not a necessity.



#### Some Considerations:



Have 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



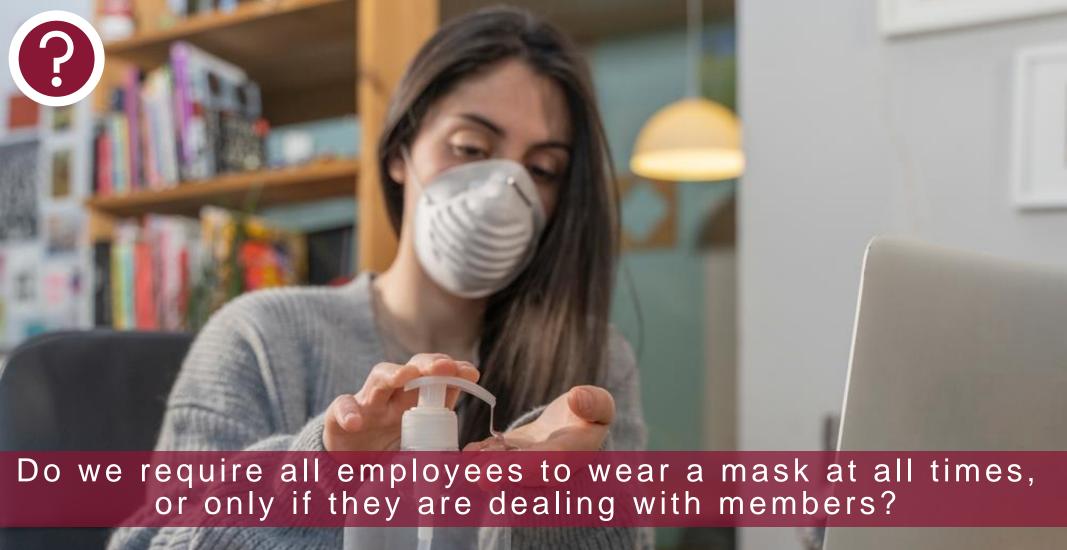
Have members wait outside in the vestibule to be identified by staff before being let in or have a greeter at the door identifying members before proceeding



Allow members into the lobby by appointment only.

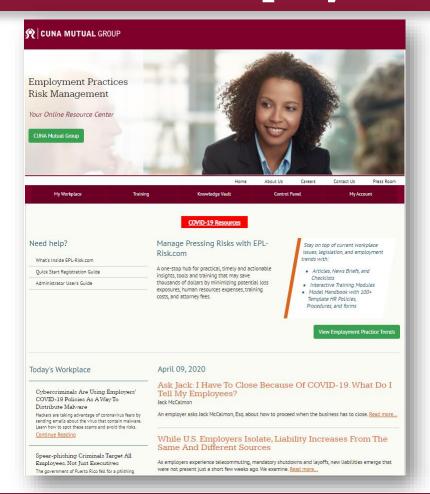
Request a driver's license or photo ID to confirm individual.

Adhere to Local, State, and Federal laws regulating the wearing of masks.





## **Employment Practices Resources**



www.epl-risk.com

#### Focus on workplace issues, legislation, and employment trends

- Articles, news briefs, and checklists
- Training modules
  - · Preventing sexual harassment
  - · Preventing discrimination
  - Preventing wrongful termination / retaliation
  - · Promoting ethical behavior
- 100+ template policies & procedures including disease / epidemic control
- Model handbook: 300+ pages

Helps minimize human resource expenses, training costs, and attorney fees

# What are the top-of-mind risks?

- Lending-Loss Mitigation Strategies
  - Consumer: Skip-a-pay
  - Mortgage: Deferment/Forbearance
  - Collection Strategies
- Emergency Loans
  - Consumer
  - Business-PPP
- Remote / flexible work arrangements



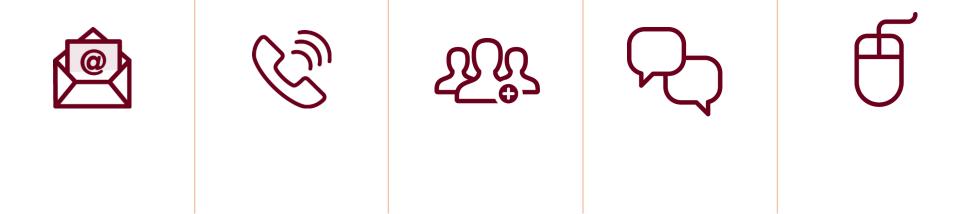
#### The Member Collections Experience



#### Keys to Success

- Focus on the member's individual situation
- Early Intervention
- Multi-channel approach

# Member engagement is Evolving



Email, Text, Social Media



# Preventative Measures



- Overspending alerts
- Money management assistance
- Spending habits/trends
- Budgeting Tools
- Self-service options for debt management

Source: Claims data, CUMIS Insurance Society, Inc.

#### The Power of Data and Technology

- Leverage data to your advantage
- Explore the Digital Age
- Consider the over-all relationship and the account history
- ✓ Improve efficiency and reduce collection costs
- ✓ Improve "right-party" contact rates
- Avoid compliance pitfalls



# The reality.

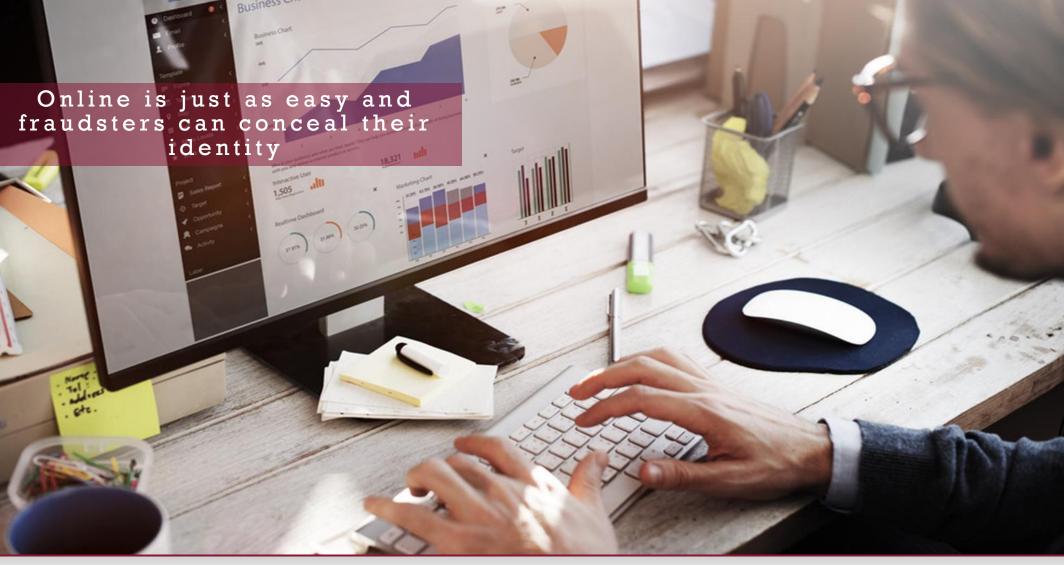
Many credit unions analyze the member journey within a single channel.

However, we increasingly live in a lending world, where the journey is more convoluted.

#### **Channels:**

- In-Person Branches
- Call Center
- Indirect
- Digital Lending





#### **Remote Workforce:**

Tips for managing rapid deployment.

How do you monitor productivity?

How do you maintain data security?



#### Remote Work Best Practices

#### Ensure Data Protection

Privacy and security of your member and credit union information should be a top priority

If using personal mobile and desktop devices, identify minimum standards of security to access credit union networks

#### Avoid FLSA Violations

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

- Encourage a Healthy Work Environment
   Employee health and safety should remain a top priority –
   ensure the environment would be suitable for getting the job done without posing undue risks
- Define Availability, Responsiveness & Productivity
   Provide clear and consistent communication to ensure employees can and do stay on task remotely



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**CUNA Mutual Group** 

# Risk & Protection Response Center



2 800 637 2676 Select you're a credit union, then choose option 4



riskconsultant@cunamutual.com



Ask a Risk Manager interactive form

# CUNA MUTUAL GROUP

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