

Community Bankers Association of Illinois

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Tips for Creating Safe Community Banks

Community bankers 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 CBAI members, our partner community banking associations around the country, and guidance from state and federal health officials. It 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.

Before Re-Opening - Supplies

- Have PPE supplies on hand and maintain the recommended amount of supplies. Recommended supplies include:
 - o Infrared thermometer (one per 100 employees per shift)
 - o Hands-free hand sanitizer dispenser floor stand (one per work area per 50 employees)
 - 30-day supply minimum of the following:
 - Disposable non-surgical masks (one per day)
 - Nitrile gloves (for cleaners only)
 - Disinfectant spray/wipes
 - Hand sanitizer refills
 - Paper towels
 - Face shields (if working within three 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.
- 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

- Create a 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.
- 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 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.
- Be mindful of litigious people. Ensure all employee concerns, questions, issues, etc. are thoroughly documented and addressed, as appropriate. Communicate this requirement with all bank management.

Before Re-Opening – Workspaces

- Make sure that you can maintain at least six feet of physical separation between yourself and others around you, including your co-workers and customers.
- Mark six-foot spacing with signage or tape for employees and customers to maintain appropriate distance from one another.
- Provide face coverings to employees, especially when it is not possible to maintain at least six feet of space between you and another person.
- Provide handwashing stations with soap, clean water and single-use paper towels and encourage frequent handwashing for 20 seconds or longer.
- Provide hand sanitizer (with at least 60% alcohol) and sanitizing products for employees and customers.
- Regularly clean high-touch surfaces including doorknobs, light switches, shared equipment, toilet handles, sink faucets and clock in/out areas.
- 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.
- Physical barriers should be installed if the workers cannot be six 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 with chairs spaced six feet apart.
- Customer waiting or seating areas should be reconfigured to ensure physical distancing standards are achieved.
- Consider displaying posters 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. Essential employers are required to post <u>Workplace Health and Safety Guidance</u> <u>for Employees and Staff of Businesses</u> pursuant to Executive Order 2020-32 (Stay at Home Order).
- Consider reconfiguring employee locations so functions and departments are not all seated together to minimize the risk of critical banking functions being impacted.

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 loved one, or struggling with childcare. Engage your employee benefits partner and provide information and other support sources for additional employee assistance.
- Solicit feedback from employees before, during and after the plan has been implemented.
- 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.

Screening Employees/Customers

- Per the Illinois Department of Public Health, employees should not report to work if you are
 experiencing symptoms of Coronavirus Disease (COVID-19), including fever (100.4° or above), cough,
 shortness of breath, sore throat, chest tightness, extreme fatigue, loss of sense of taste or smell,
 diarrhea, muscle aches or headaches. If you are experiencing any of these symptoms, stay home
 and call your doctor.
- On-site daily screenings should be done for all employees, contractors, suppliers and visitors before accessing company facilities/offices.
- If you decide to screen employees and customers, 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 recommended by the <u>Illinois Department of Public Health</u>:
 - 1. Subjective fever
 - 2. Cough
 - 3. Shortness of breath
 - 4. Congested/runny nose
 - 5. Chills
 - 6. Unexplained Muscle Ache
 - 7. Headache
 - 8. Unexplained Fatigue
 - 9. Abdominal Pain
 - 10. Nausea or vomiting
 - 11. Diarrhea
 - 12. Loss of smell or taste
- Employee/customer screening should be consistent. Do not select individuals or those you perceive to be in high risk groups for potentially unequal treatment.
- We recommend checking with your county's health department for any additional screening requirements that are county specific.
- 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 this link.
- It is recommended a screening form be completed every day for employees and kept on file in a separate, locked location. This protects employers from potential future workers compensation claims and legitimizes your Preparedness Response Plan.
- Check with your county to determine if there are specific orders regarding required screening questions.

Employee/Customer Safety in the Workplace

Per the Governor's Stay at Home Order, masks must be worn by anyone over the age of two who is medically able to tolerate it in any indoor public space where maintaining six feet of social distancing space is not possible. The Illinois Department of Human Rights has released guidance on face coverings. https://www2.illinois.gov/dhr/Documents/IDHR_FAQ_for_Businesses_Concerning_Use_of_Face-Coverings_During_COVID-19_Ver_2020511b%20copy.pdf

- Implement separate operating hours for elderly and vulnerable customers.
- Post online whether a facility is open and how best to reach the facility and continue services by phone or remotely.
- 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, phones, copiers, coffee pots, keyboards, mice, desks and cubicle walls in workstations.
- 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 six-foot social distancing space.
- Place marks six feet apart on the floor in your lobby areas so customers know where to stand.
- 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.
- 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.

What to do when an employee exhibits symptoms and/or has a confirmed COVID-19 diagnosis:

- If an employee self-screens and reports symptoms of COVID-19, they should stay home and call their doctor.
- If an employee shows symptoms of COVID-19, they should immediately be sent home and directed to contact their doctor.
- If an employee has a positive COVID-19 test, the following steps should be taken:
 - 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 seven days. The employees should notify HR if any symptoms develop. These employees should still continue to work remotely if possible.
 - o Identify and notify any other employees who may have come into contact with the infected employee to self-screen daily and notify HR if symptoms develop.
 - 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 or contractors who may have been exposed. If you choose to notify customers or contractors, 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.
- Ensure screening and subsequent actions are consistent company wide.

Preparedness Plan Document

- Maintain a plan at headquarters.
- If an employee asks to see the plan, you should share a copy with them and 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 to be the contact person for COVID-19 issues. This person may also handle the pre-work screening.
- The plan 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.
- 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.

Suggested Resources:

Workplace Health and Safety Guidance for Employees and Staff of Business

CBAI COVID-19 Resource Page

ICBA COVID-19 Resource Page

CDC Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-

19), May 2020

Illinois Stay at Home Order

Illinois Department of Human Rights Guidance on Face Coverings