



**NATIONAL INDEPENDENT
AUTOMOBILE DEALERS ASSOCIATION**

**THE INDEPENDENT
DEALER'S GUIDE
FOR SAFELY OPERATING
DURING COVID-19**



INTRODUCTION

As the calendar turned to 2020, the world was introduced to the novel Coronavirus and its associated disease – COVID-19. This pandemic prompted broad shelter-in-place orders and a wide-sweeping economic shutdown across the country. Although some businesses' operations – including automobile sales and service – have been considered “essential” by various jurisdictions allowing them to remain open despite these broad closure orders, the simple fact is COVID-19 has impacted every independent dealership.

Now, governments are relaxing these strict measures and focusing on restarting the economy. Independent dealers need to think about how they will adapt and move forward operating their businesses safely and sustainably. NIADA has compiled this document as a tool to help dealers plan carefully, understand what changes may need to be made in their business to take advantage of post-pandemic opportunities while protecting the health and safety of their customers, employees, and vendors.

The suggestions contained in this document come from various government agencies – including the Centers for Disease Control and Prevention (CDC), Occupational Safety and Health Administration (OSHA), and California Department of Public Health – and fellow dealers as practices independent dealers across the country have begun to implement in their dealerships.

Because information about the Coronavirus and COVID-19 changes rapidly, dealers are encouraged to stay abreast of the latest information from sources such as:

- **CDC**
- **OSHA**
- **Coronavirus.gov**
- **White House Guidelines for Opening Up America Again**
- **Official state websites**
- **State and local health departments**
- **NIADA and affiliated state associations**



GENERAL CONSIDERATIONS

01

ESTABLISH A WRITTEN PLAN FOR SAFE WORKPLACE

Independent dealers should establish a written, worksite-specific COVID-19 prevention plan at every facility that identifies all areas and job tasks with potential exposures to COVID-19, and includes control measures to eliminate or reduce such exposures. Dealers should train and communicate with employees and employee representatives about the plan. Dealers should identify an individual to ensure implementation of and compliance with the plan and then document and correct deficiencies identified. Plans should be updated as needed to adapt to changing circumstances.

The plan should focus on how best to decrease the spread of COVID-19 and lower the impact in your workplace, and include details aimed to:

- **Prevent and reduce transmission among employees,**
- **Maintain healthy business operations, and**
- **Maintain a healthy work environment.**

02

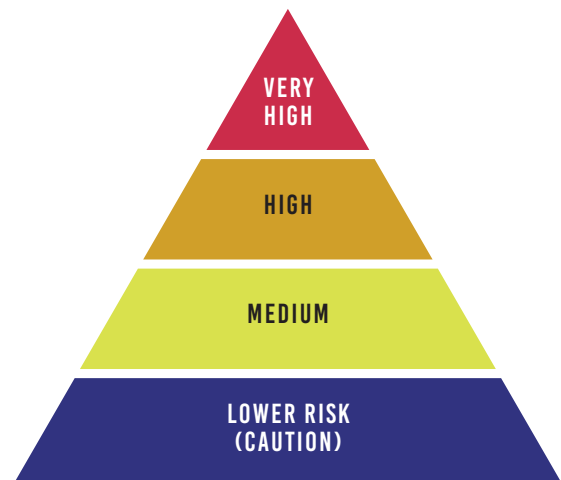
CREATING A SAFE WORKPLACE TO PREVENT AND REDUCE TRANSMISSION

The following are guidelines from the CDC and OSHA aimed at preventing and reducing the spread of the COVID-19 at your place of business.

CONSIDER CONDUCTING DAILY IN-PERSON OR VIRTUAL HEALTH CHECKS OR ENCOURAGE SELF-SCREENING AT HOME (e.g., symptom and/or temperature screening) but do so in accordance with state and local public health authorities and, if available, your occupational health services.

IDENTIFY WHERE AND HOW WORKERS MIGHT BE EXPOSED TO COVID-19 AT WORK. Conduct a thorough hazard assessment to determine if workplace hazards are present, or are likely to be present, and determine what type of controls or personal protective equipment may be needed for specific job duties. Encourage workers to wear a cloth face covering at work if the hazard assessment has determined that they do not require personal protective equipment (PPE) for protection. Remind employees and customers that CDC recommends wearing cloth face coverings in public settings where other social distancing measures are difficult to maintain

CLASSIFY WORKER EXPOSURE TO CORONAVIRUS. OSHA recommends employers classify the risk of worker exposure to COVID-19. Worker risk of occupational exposure to COVID-19 during an outbreak may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part on the industry type, need for contact within 6 feet of people known to be, or suspected of being, infected with COVID-19 or requirement for repeated or extended contact with persons known to be, or suspected of being, infected with COVID-19. OSHA recommends using this occupational risk pyramid.



Dealership employees with frequent contact with customers will likely be classified as medium exposure risk, while those who have minimal contact with the public will likely be classified as lower risk.

FOLLOW CDC CLEANING AND DISINFECTING GUIDELINES

- Clean dirty surfaces with soap and water before disinfecting them.
- To disinfect surfaces, use products that meet EPA criteria for use against SARS-Cov-2, the virus that causes COVID-19, and are appropriate for the surface.
- Always wear gloves and gowns appropriate for the chemicals being used when you are cleaning and disinfecting.
- You may need to wear additional PPE depending on the setting and disinfectant product you are using. For each product you use, consult and follow the manufacturer's instructions for use.

CREATING A SAFE WORKPLACE TO PREVENT AND REDUCE TRANSMISSION (CONT)

TAKE ACTION IF AN EMPLOYEE IS SUSPECTED OR CONFIRMED TO HAVE COVID-19 INFECTION.

Determine which employees may have been exposed to the virus and may need to take additional precautions:

- Inform employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA).
- The CDC recommends most workplaces follow the “Public Health Recommendations for Community-Related Exposure” and instruct potentially exposed employees to stay home for 14 days, telework if possible, and self-monitor for symptoms.

EDUCATE EMPLOYEES ABOUT STEPS THEY CAN TAKE TO PROTECT THEMSELVES AT WORK AND AT HOME.

- Encourage employees to follow any new policies or procedures related to illness, cleaning and disinfecting, and work meetings and travel.
- Advise employees to stay home if they are sick.
- Inform their supervisor if they have a sick family member at home with COVID-19.
- Advise employees to follow these safe sanitation measures:
 - Wash their hands often with soap and water for at least 20 seconds or to use hand sanitizer with at least 60% alcohol if soap and water are not available.
 - Cover their mouth and nose with a tissue when coughing or sneezing, or use the inside of their elbow. Throw used tissues into no-touch trash cans and immediately wash hands with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer containing at least 60% alcohol.
 - Practice routine cleaning and disinfection of frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use products that meet EPA’s criteria for use against SARS-CoV-2 and are appropriate for the surface.
 - Avoid using other employees’ phones, desks, offices, or other work tools and equipment, when possible. Clean and disinfect them before and after use.
 - Practice social distancing by avoiding large gatherings and maintaining distance (at least 6 feet) from others when possible.

GIVE EMPLOYEES WHAT THEY NEED TO CLEAN THEIR HANDS AND COVER THEIR COUGHS AND SNEEZES.

- Provide tissues and no-touch trash cans.
- Provide soap and water in the workplace. If soap

and water are not readily available, use alcohol-based hand sanitizer that is at least 60% alcohol. Ensure that adequate supplies are maintained.

- Ideally, place touchless hand sanitizer stations in multiple locations to encourage hand hygiene.
- Place posters that encourage hand hygiene to help stop the spread at the entrance to your workplace and in other workplace areas where they are likely to be seen. This should include signs for non-English speakers, as needed.
- Discourage handshaking. Encourage the use of other noncontact methods of greeting.

CONSIDER FLEXIBILITY AS NEEDED

- **Have conversations with employees about their concerns.** Some employees may be at higher risk for severe illness.
- **Examine policies for leave, telework, and employee compensation.**
 - Consider leave policies that are flexible and non-punitive, and allow sick employees to stay home and away from co-workers. Leave policies should also account for employees who need to stay home with their children if there are school or childcare closures, or to care for sick family members.
 - When possible, use flexible worksites (e.g., telework) and flexible work hours (e.g., staggered shifts) to help establish policies and practices for social distancing (maintaining distance of approximately 6 feet or 2 meters) between employees and others, especially if social distancing is recommended by state and local health authorities.
- **Consider other flexible policies for scheduling and telework (if feasible) and create leave policies** to allow employees to stay home to care for sick family members or care for children if schools and childcare close.



AROUND THE DEALERSHIP

In addition to those guidelines contained in the General Considerations section, the following suggestions are offered to independent dealers for their consideration across the dealership. Each dealership should adopt practices applicable to its operations and ensure employees are familiar with those practices.

IN THE SHOWROOM

01



- Thoroughly clean high traffic areas including waiting areas, break rooms, and entrance and exit areas.
- Frequently disinfect commonly used surfaces, including counters, credit card machines, touchscreens, doorknobs, armrests, toilets, handwashing facilities, door handles, vehicle keys, and vehicles displayed in the showroom (door handles, seat adjustment controls, radio).
- Avoid sharing phones, tablets, office equipment, or tools wherever possible.
- Clean and sanitize shared equipment, such as time clocks, payment portals, pens, and styluses between each use.
- Provide terminals, desks, and help counters with proper sanitation products, including hand sanitizer and sanitizing wipes particular at places where employees are interacting with customers.
- Ensure that restrooms stay operational and stocked at all times and provide additional hand sanitizer when needed.
- Consider altering store hours to provide adequate time for regular deep cleaning.
- Consider installing portable high-efficiency air cleaners, upgrading the building's air filters to the highest efficiency possible, and making other modifications to increase the quantity of outside air and ventilation in offices and other spaces.
- Ensure physical distancing of at least six feet between workers and customers. This could include use of physical partitions or visual cues such as floor markings or signs to indicate where individuals should stand.
- If physical distancing cannot be maintained between employees and customers, consider installing barriers such as Plexiglass or other appropriate barriers, if feasible. Where barriers are not feasible, employees and customers are encouraged to wear face coverings. Please note, some jurisdictions already require face coverings outside the home.
- Redesign showroom to ensure workspaces allow for six feet between employees.
- If possible, clearly designate a separate entrance and a different exit to help maintain physical distancing, wherever possible.
- Adjust maximum occupancy based on the size of your facility to limit the number of people in a store, office, or showroom at one time.
- Ask vendors who are required to enter the location to have their employees follow the guidance of local, state and federal governments regarding wearing face coverings.
- Encourage employees to avoid handshakes and physical greetings.
- Post signage on the showroom entrance discouraging customers from entering if they are sick and encouraging them to maintain social distancing within the dealership.
- Post notice on the dealership website and social media pages outlining steps taken to keep customers and employees safe.

02

IN THE VEHICLE



- Clean and disinfect vehicles upon acquisition into inventory through trade or wholesale purchase from auctions or other sources, prior to a test drive, upon return as a rental or loaner, upon intake for service, upon return to the consumer following service, and following any repossession.
- Cleaning should focus on high touch areas such as the steering wheel, gear shifter, radio, window, door handles, cup holders, seat belts, arm rests, seat adjusters, mirror, turn signals, and buttons/touch screens.
- Limit passengers in the vehicle during test drives to only a single customer, and if the employee is riding with the customer, consider having the employee sit in opposite back seat, if applicable.
- Consider use of protective barriers such as disposable mats and seat covers when applicable during test drives and moving returned vehicles.

03

SALES AND FINANCING



- Encourage customers to schedule appointments and have customers practice social distancing while waiting at the dealership.
- Get consumer through as much of the sales process prior to arrival at the dealership as possible. This could include necessary financing qualification.
- Consider online sales and/or remote delivery. Be aware, however, that online sales and/or remote delivery are not permitted in every jurisdiction. Dealers should consult local laws to determine whether they can engage in online sales or deliver remotely. Dealers should also be cognizant of the FTC's Cooling Off Rule and any state door-to-door sales rule that may apply.
- Dealers offering online sales and/or remote delivery should consult counsel to ensure compliance with any applicable state or local restrictions due to COVID-19.
- Consider curbside delivery or pickup and move sales and agreements to remote/digital platforms if possible.

04

SERVICE DEPARTMENT

- Encourage customers to schedule appointments.
- Post signage on the shop entrance discouraging customers from entering if they are sick and encouraging them to maintain social distancing within the dealership.
- Develop a drive up drop off process that maximizes social distancing.
- Ensure customers practice social distancing while in waiting rooms using visual cues or ask customers to wait outside.
- Clean and disinfect vehicles upon intake from customer focusing on high touch areas such as the steering wheel, gear shifter, radio, window, door handles, cup holders, seat belts, arm rests, seat adjusters, mirror, turn signals, and buttons/ touch screens.
- Clean and disinfect vehicles again following completion of service before return to customer.
- Disinfect keys prior to returning to customer.
- Consider developing a photo-estimating process to communicate with consumers remotely.
- Consider sending repair order and receipt digitally.
- Disinfect payment portals and complete payments electronically as much as possible.
- Practice social distancing amongst the technicians minimizing working on same vehicle unless necessary and ensure technicians wear face coverings if not able to maintain social distancing.
- Encourage technicians to wear gloves while performing service or to disinfect any shared equipment.
- Develop a process for cleaning technicians' uniforms and boots discouraging them from removing them from the dealership so as to minimize the spread.

05

COLLECTIONS/ACCOUNT SERVICING



- Establish and emphasize contactless payment methods including payment by phone, automatic recurring payments, payment kiosks, pay by text and other such technologies.
- If accepting payments in person, ensure social distancing of at least six feet between workers and customers. This could include use of physical partitions or visual cues such as floor markings or signs to indicate where individuals should stand.
- If physical distancing cannot be maintained between employees and customers, consider installing barriers such as Plexiglas or other appropriate barriers, if feasible. Where barriers are not feasible, employees and customers are encouraged to wear face coverings. Please note, some jurisdictions already require face coverings outside the home.
- Disinfect any on-site payment portals.
- Establish procedures to ensure employee safety in handling a customer's personal effects left in a vehicle following repossession.
- Clean and disinfect vehicles following repossession prior to any public or private disposition sale.

REFERENCES

GOVERNMENT PUBLICATIONS

Centers for Disease Control and Prevention Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19), May 2020.

Occupational Health and Safety Administration Guidance of Preparing Workplaces for COVID-19, OSHA 3990-03 2020.

California Department of Public Health and California Division of Occupational Safety and Health COVID-19 General Checklist for Automobile Dealers and Rental Employers, May 7, 2020.

NIADA RESOURCES

NIADA COVID-19 Dealer Resource Page (covid19.niada.com)

SPECIAL THANKS TO:

Brittany Hibdon, Hibdon Auto Center

Chris Haus, Haus Auto Group

Erika Blankenship, Texas Auto Center

Joe McCloskey, McCloskey Motors

Luke Godwin, Godwin Motors

All content in this document is provided for general informational purposes only and to assist independent automobile dealers respond to issues associated with the COVID-19 pandemic. This document is not intended to constitute legal advice and does not address all legal/compliance issues that may apply. As necessary and appropriate, dealers are encouraged to consult an attorney familiar with the federal, state, and/or local laws at issue and with dealership operations to obtain specific advice on the legal matters associated with the COVID-19 pandemic.

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