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NADA MANAGEMENT SERIES

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A DEALER GUIDE TO

Safely Operating Your Dealership During a Pandemic



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A DEALER GUIDE TO

Safely Operating Your Dealership During a Pandemic

TABLE OF CONTENTS

Introduction	1
What this Guide Will Cover	2
Basic Prevention for Employees and Customers	2
How to Clean and Disinfect Your Facility	3
How to Clean and Disinfect Vehicles	5
When a Customer Needs Service	6
Vehicle Sales During a Pandemic	9
In-Dealership Sales	9
Online Sales	9

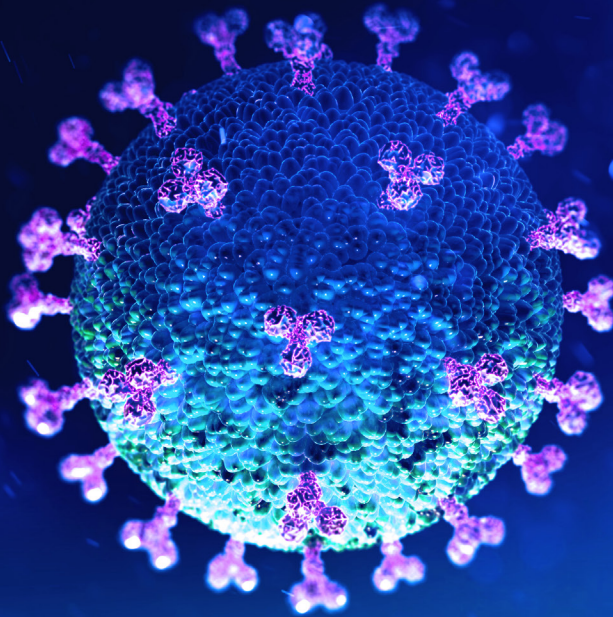
Safely Operating Your Dealership During a Pandemic

Introduction

The new coronavirus—COVID 19—has upended the way we live and the way we do business. As Americans deal with quarantines, lockdowns and stay-at-home orders intended to “flatten the curve” and slow the spread of the virus, dealers should maintain their essential operations while minimizing unnecessary health risks.

NADA aims to assist member dealers in coping with the crisis by disseminating the most reliable information currently available. This guide approaches the subject with an abundance of caution. We have compiled guidance from such sources as the [Centers for Disease Control and Prevention \(CDC\)](#) to help dealers

minimize the risks posed by COVID-19 by using best practices to clean and disinfect dealership facilities and vehicles, perform necessary service repairs and maintenance, and conduct business virtually. Important: The CDC stresses that *employers should work with their local and state health departments to ensure appropriate local protocols and guidelines, such as updated/additional guidance for cleaning and disinfection, are followed, including for identification of new potential cases of COVID-19.* Thus, always check with your [local health department](#) or state and local dealer association for critical information.



What This Guide Will Cover

This guide provides basic information on:

- Keeping your employees and customers safe during this pandemic.
- Cleaning and disinfecting dealership facilities and vehicles.
- Safely handling service operations.
- Safely handling sales operations.

Dealers and line managers should be familiar with the recommendations in the guide, and ensure that every employee responsible for implementing the recommendations is extremely careful and thorough. Please distribute the guide to the appropriate personnel.

Basic Prevention for Employees and Customers

The best way to prevent illness is to avoid exposure. According to the CDC, [the virus is thought to spread](#) mainly from person to person, between people who are in close contact (within 6 feet). It is spread through respiratory droplets produced when an infected person coughs, sneezes or talks, and may be spread by infected people who are not showing symptoms. It may be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching his or her own mouth, nose or possibly eyes.

Always consider the safety of your customers and employees first. Ensure that every person working in the dealership maintains personal hygiene and makes it possible for customers to maintain theirs.

- All personnel should wash their hands regularly with soap and water for at least 20 seconds. If they can't get to a sink, use hand sanitizer that is at least 60% alcohol.

- Make sure that sanitizing hand rub dispensers are placed in prominent places around the workplace and regularly refilled
- Display posters promoting hand-washing — ask your local public health authority for these.
- Combine this with other communication measures such as guidance from occupational hygienists, briefings at meetings and information on the intranet to promote hand-washing.
- Make sure that staff, contractors and customers have access to places where they can wash their hands with soap and water.

Washing kills the virus on your hands and prevents the spread of COVID-19.

Also, all personnel should practice good respiratory hygiene in the workplace:

- All employees should wear face coverings according to the latest CDC guidance. Ensure that (ordinary surgical) face masks are available and utilized, along with closed bins for hygienic disposal.
- Display posters promoting respiratory hygiene. Combine this with other communication measures such as offering guidance from occupational health and safety officers, briefing at meetings and information on the intranet, etc.

Good respiratory hygiene prevents the spread of COVID-19.

Finally, it is important to maintain good social distancing (about 6 feet) to prevent spreading the disease.

Any employee who exhibits CDC-listed Covid-19 symptoms or has tested-positive must stay home.



How to Clean and Disinfect Your Facility

According to the CDC, *cleaning* works by using soap (or detergent) and water to remove germs from a surface. It doesn't necessarily kill the germs but reduces the number of germs and thus the chance of spreading infection. *Disinfecting* uses chemicals to kill the germs on a surface after cleaning, thus further lowering the risk. *Sanitizing* lowers the number of germs to a safe level and works by either cleaning or disinfecting.

You need to both clean and disinfect your facility. First, put on disposable gloves.

Do's and don'ts when using disposable gloves:

- **DO** change gloves when heavily soiled or torn.
- **DO** dispose of used gloves appropriately.
- **DO** wash hands thoroughly, before and after glove use.
- **DO** remove wrist jewelry before putting on gloves.
- **DON'T** touch surfaces such as door handles, keyboards, etc., with contaminated gloves.
- **DON'T** touch your face or adjust gloves with contaminated gloves.
- **DON'T** remove one glove and then pull the other glove off by the fingertips
- **DON'T** reuse disposable gloves once they have been removed.

Next, consider and employ the appropriate level of cleaning. Cox Automotive suggests four cleaning levels:

1. **Daily Clean:** Baseline scope of typical housekeeping duties. Primarily cleaning/wiping of surfaces with limited use of disinfectants (usually in bathrooms).
2. **Enhanced Clean:** Use of [CDC/EPA-approved disinfectant](#) cleaners on "high touch" surfaces in common areas/public spaces at regular frequency (elevator buttons; railings; door knobs and handles; light switches; bathrooms including toilets, faucets and sinks; breakrooms and breakroom equipment like refrigerator handles, microwaves, tables, etc.).
3. **Deep Clean:** In addition to the "Enhanced Clean" scope above, "deep cleaning" applies to disinfecting items such as desks, chairs, computer keyboards/mice, interactive touch screens, phones, printers, fax machines, office

door handles, communal items like salt and pepper shakers and coffee creamer dispensers in workspaces like offices, workstations, conference rooms, cafeterias, etc.

4. **Deep Clean Per Health Department Recommendations:**

Disinfection/sanitation requirements set forth by the state or local health department. In instances where an employee, vendor or customer has been identified as having COVID-19 symptoms or a positive test, please contact your state or local health department for appropriate disinfection/sanitation instructions. Please also see the [CDC information](#) on "Cleaning and Disinfection After Persons Suspected/Confirmed to Have COVID-19 Have Been in the Facility" and the NADA webinar "So, an Employee HAS COVID-19 Symptoms or Has Tested Positive...Now What?"

For enhanced cleaning of hard surfaces, the CDC recommends cleaning dirty surfaces or objects with soap and water first, and then using a disinfectant. Be sure to read the directions on the label, as many products advise keeping the surface wet for a time and ensuring adequate ventilation during use.

The CDC further advises that diluted household bleach solutions may be used if appropriate for the surface. Check the expiration date on the container. Unexpired household bleach will be effective against coronaviruses when properly diluted. Never mix household bleach with ammonia or other cleanser. Make a solution by mixing 5 tablespoons (one-third cup) of bleach per gallon of water or 4 teaspoons bleach to one quart of water. Leave the solution on the surface being disinfected for at least one minute.

Another option for disinfection: alcohol solution with at least 70% alcohol.

Hydrogen peroxide should be able to break down the virus as well. Spray it undiluted on the surface to be cleaned, allowing the surface to remain wet for a minute.

For soft surfaces such as carpeted floor or draperies, use an EPA-registered household disinfectant or clean the surface with soap and water (or appropriate cleaners) and launder items that can be laundered using the warmest recommended setting and dry thoroughly.

Electronics should be cleaned according to the manufacturer's instructions. If there are no such instructions, use alcohol-based wipes or sprays (containing at least 70% alcohol) and dry carefully.

For laundry—uniforms, towels, etc.—wear disposable gloves. Do not shake dirty laundry. Launder according to manufacturer instructions, using the warmest water appropriate, and dry completely. Wash hands with soap and water after removing gloves.

Specific Areas to Consider for Cleaning:

- ✓ **Lobbies/Entrances/Conference Centers/High Traffic Public Use areas**
 - Entrances and interior door handles/push plates
 - Reception desks/counters
 - Lobby/common area furniture (chair arms/table surfaces)
 - Stairwell railings
 - Elevator call buttons
 - Water fountains

✓ **Restrooms**

- Door handles/push plates
- Light switches
- Counters, faucets, flush valves, toilet door locks, partition handles and railings
- Toilets and urinals
- Toilet paper/paper towel dispensers

✓ **Breakrooms/Kitchenettes**

- Door handles/push plates
- Counter surfaces
- Furniture/table surfaces
- Refrigerator/microwave/coffee pot handles
- Vending machines (if applicable)
- Ice/water machines (if applicable)
- Furniture (chairs, tables, etc.)

(Checklist from Cox Automotive)

The Occupational Health and Safety Administration (OSHA) also offers advice in its publication, [“Guidance on Preparing Workplaces for COVID-19.”](#)



How to Clean and Disinfect Vehicles

There are several scenarios where cleaning of vehicles may be warranted:

- When a vehicle is brought in for service and when it is returned to the customer.
- When a vehicle is taken from inventory for a test drive.
- When a used vehicle is taken into the dealership as a trade or from auction.

Note: This guide does not provide advice in cases where a driver or other occupant of a vehicle is showing symptoms of COVID-19 or has tested positive.

Standard cleaning and disinfection should focus especially on frequently touched surfaces, including the steering wheel, door handles, gear shifter, cup holders, seat buckles, buttons or touch screens, wiper and turn signal stalks, passenger and driver door armrests, grab handles, and seat adjusters.

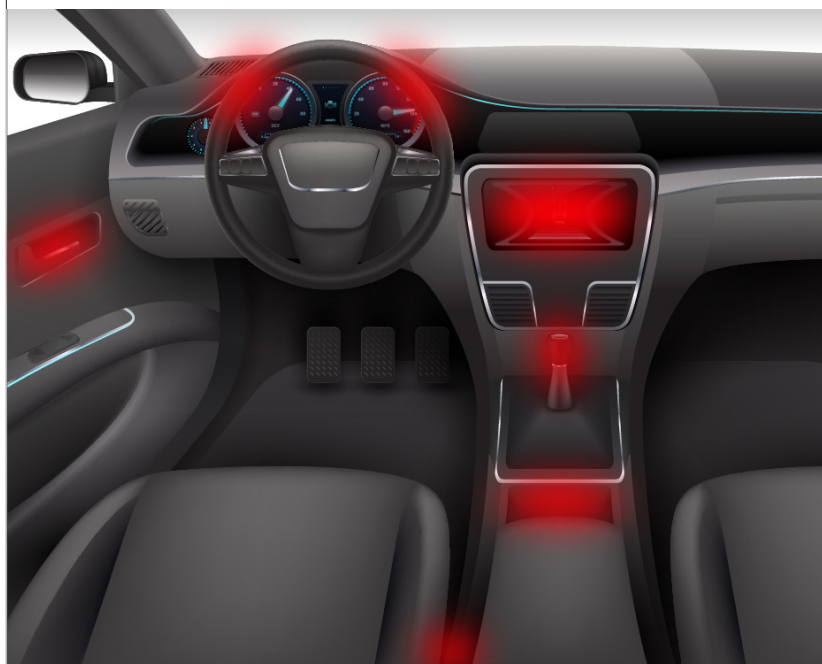
Most of the disinfectants noted above can clean a vehicle's interior without damage. Isopropyl alcohol will work without degrading most plastic or painted chrome, but over time it will degrade leather or imitation leather. It's possible to clean the exterior surface of soft upholstery with alcohol. Bleach or hydrogen peroxide, however, will damage upholstery, and ammonia-based cleaners will damage vehicle touch screens. It's fine to use soap and water as long as you don't scrub too hard, which can cause suds to soak into the fabric and lead to mold growth. Too vigorous scrubbing can also remove dye from leather. Be sure to use a good leather cleaner and conditioner after cleaning leather upholstery.

Experts also recommend cleaning all surfaces with a microfiber cloth, which captures dirt and dust particles before they can scratch delicate or shiny plastic surfaces.

Be sure hands are washed after vehicle cleaning before and after driving.

Hagerty.com noted a [video](#) that is particularly instructive concerning the disinfection of a vehicle's "hot spots." Those are the surfaces touched most—i.e., the steering wheel, interior door handles, cup holders,

gear shifter, seat buckles, and radio/climate control buttons. Check the disinfectant you're using to make sure it has an EPA registration number, which is evidence that the product can indeed kill germs. Read the instructions with special attention to the product's "dwell time," which is how long the product should stay on the surface. If you wipe down the surface and then dry it quickly, you are not allowing the product to do its job. The video also advises testing the product in an inconspicuous place to ensure there's no fading or discoloration of the surface you are testing.



If a vehicle may have been exposed to someone with COVID-19, Cox Automotive recommends the following:

1. The vehicle is not touched for 24 hours.
2. After the 24-hour window has passed, clean with an EPA-approved disinfectant, wiping down all hard/solid surfaces while wearing proper personal protective equipment for the chemicals used, including gloves.
3. Upon completion, gloves are properly disposed of, and hands are washed and sanitized.

Ideally, the vehicle can be secured without accessing the interior; however, *if the vehicle cannot be secured, or if it must be moved prior to the 24-hour waiting period*, follow the same cleaning process for both the vehicle's interior and exterior.

When a Customer Needs Service

Dealership service operations are essential for consumers who need their vehicles for such necessities as work, health care and food shopping. Most of the states and localities that have issued business shut-down orders have exempted vehicle service and repair.

Every vehicle is a hot spot because each is a confined area that must be touched to be operated safely. Every vehicle can travel from one place to another, carrying germs from one place to another. When customers drive into your shop, remember that their vehicles are hot spots. Utilize cleaning and disinfecting procedures noted above with all customer vehicles. Also remember to maintain social distancing with customers. That does not change when you provide service.

NADA Academy instructors offer some best practices for your service department during the pandemic:

- Implement extensive safety precautions.
- Email customers to let them know you are open for service, and that you have implemented extensive sanitization procedures to minimize human contact and exposure throughout the repair and maintenance process. Inform them if you have suspended loaner programs and closed

the customer lounge. Allow them to schedule service appointments online.

- Expand service hours with additional shifts.
- Provide pick-up and delivery options. When marketing, remember to never use the term “free” but rather “at no additional charge.”
- Update your website and any business listings.
- Give customers who take advantage of pick-up and delivery the *white glove treatment*:
 - Wear gloves to pick up customer vehicles. Wipe keys down with an EPA-approved disinfectant.
 - Provide customers with a video of your complimentary multi-point inspection.
 - Phone, text or email customers to discuss proposed work and gain approval. All communications should follow legal restrictions as discussed below.
 - Process credit card payments electronically, remembering to follow processor guidelines for taking remote payments.
 - Clean the interior of vehicles focusing on human touch points (vehicle “hot spots” described above).
 - Wear gloves when returning vehicles. Return receipts with disinfected (again) keys in a plastic bag.



When the customer's vehicle is in the service department:

- Ensure personnel are washing hands and wiping down work surfaces.
- Space staff across additional shifts to increase physical distance among employees.
- All personnel should wear gloves when touching surfaces customers are likely to touch.
- If your dealership is using electronic requests through your DMS or other online scheduling system, continue to do so. If not, explore options for electronic communications between parts and service.
- The parts consultant or runner can drop the requested parts in a designated location.

Expanded best practices are included in the checklist below.

Fixed Operations Business Practices Checklist

For conducting business, overcoming customer fears and marketing your safety protections.

Overall

- ✓ Lead by example. If you ask your team to take certain safety measures, abide by those measures yourself or they won't take you seriously.
- ✓ Listen to your team. Many people are losing jobs. Children are home because schools are closed. Some products are not available on store shelves. All of this is creating stress. Anything you can do to give your employees some level of comfort in their roles will help with productivity and their overall well-being.
- ✓ Look at opportunities to offer employees tangible assistance. Your buying power, for example, may enable you to acquire products that your staff cannot get at a store. Stay on top of federal, state, and local mandates, such as those regarding employees with symptoms or positive tests or emergency leave; they change often, sometimes daily. You need to be ready to adjust. See [NADA Coronavirus Hub](#) and information provided by your state and local dealer associations. Consult legal counsel as necessary.
- ✓ If you allow certain staff to telework, consult with your attorney about possible tax, emergency leave, unemployment, and loan program implications.
- ✓ No staff should be traveling to other company locations.

- ✓ Staff meetings in some shops are limited to no more than a few people. Keep group meetings small, in open spaces if possible, and have people physically apart from one another.
- ✓ Most importantly, keep yourselves, your team, families and customers safe. This is your highest responsibility.

Service and Body Shop

- ✓ Use social media (Facebook, your webpage, etc.) to guide consumers on your procedures for dealing with their vehicles.
- ✓ Require online scheduled appointments in 30-minute blocks in order to space out the number of people coming in for repair work.
- ✓ Encourage customers to declutter their vehicles prior to arriving at the dealership.
- ✓ Notify customers before they arrive regarding your COVID-19 procedures.
- ✓ Have customers stay in vehicles until asked to exit.
- ✓ Have valets alert customers when to exit their vehicles. Then begin the process of disinfecting the vehicle:
 - Door handles (inside and outside)
 - Armrests
 - Steering wheel
 - Seat belts and buckles
 - Any push-button areas on the dash and doors (radio, electric windows, thermostat, etc.)
 - Cruise control and windshield wiper controls
 - Glove box and center console
 - Shift levers and knobs
 - Hazard light buttons
 - Cup holders
- ✓ When all work is complete, vehicles should be disinfected again (focusing on the areas above) before delivery.
- ✓ Observe 6-foot social distancing between customers and service advisor. (Tape off distance areas.)
- ✓ Use photo-estimating as much as possible—i.e., send customers videos of the multi-point inspection or pictures of needed repairs.
- ✓ Minimize foot traffic.
- ✓ Do not allow customers in the shop. Meet customers outside and at a safe distance.



- ✓ Minimize touch points such as tablets, pens, credit cards and keys.
- ✓ Sanitize early and often, following CDC guidelines for vehicles, hand tools, and shared scan tools and special shop tools.
- ✓ Split shifts to reduce close contact. Consider opening on weekends to further spread out staff's time in the shop, and to allow working parents more flexible hours.
- ✓ Consider extending hours to accommodate split shifts and social distancing.
- ✓ Give thought to sanitizing technician locker rooms, providing a safe, clean environment to change.
- ✓ Give thought to uniform cleaning to mitigate the spread—should you have extra sets and what should you do with the used uniforms, boots, etc.? Encourage technicians and parts personnel to leave clothes and boots at work to minimize the possibility of transferring the virus between home and store.
- ✓ Consider closure of customer lounges.
- ✓ Deep clean loaner vehicles (if available and being used).
- ✓ Complete all payments electronically to eliminate contact and touch points. Note restrictions discussed above.
- ✓ Do not reuse pens.
- ✓ Gloves, dust masks, and head socks are difficult to come by because they are being sent to medical establishments. Within your own shops, DO NOT REUSE THESE ITEMS! Do not waste them, either.

Parts Department

- ✓ Have two separate areas to separate and segment parts:
 - Clean areas for customers.
 - Unclean areas for receipt of parts from OEM.

- ✓ Observe 6-foot social distancing between customers and parts counterperson. (Tape off distance areas.)
- ✓ Minimize foot traffic.
- ✓ Minimize touch points with customers (tablets, pens, credit cards, parts scanners, keyboards).
- ✓ Eliminate shared workstations and phones. Dedicate employees to work front, back and wholesale counters—but consider closing back counters to eliminate social contact.
- ✓ Sanitize often, following CDC guidelines.
- ✓ Enable online ordering with online payment and notification of curbside pickup.
- ✓ Offer contactless delivery services for local area.
- ✓ Designate a shelf or bin for each technician to expedite storage of needed parts and eliminate social contact.
- ✓ Let inbound invoices and shipping manifests sit for 24-48 hours to minimize contact with office manager.
- ✓ Investigate other channels to reach customers; consider Facebook, Instagram, Pinterest, enthusiast forums.
- ✓ Develop video content, easy or frequently asked questions and how-to's (such as how to replace your remote key battery, maintaining your vehicle while potentially not driving, keeping your battery fresh, making sure you don't get flat spots on your tires).

If customers insist on dropping off their vehicles, advise them that they will need their own transportation if lounges are closed and loaners are suspended. Once service is completed, email the RO to customers for signature. Customers with print and scan capability can return a signed RO or a picture of the signed RO.

Vehicle Sales During a Pandemic

State and local COVID-19-related business closure orders vary greatly and change almost daily. Many place restrictions on new- and used-vehicle sales. Consult your [state or metro dealer association](#) for specific information about the application of such restrictions to location. [Dealer News Today](#) has compiled a useful region-by-region guide that is kept current.

In-Dealership Sales

Dealerships that are permitted to remain physically open for sales should let their customers know, by email, their websites, on third-party listing sites, and in search engines and review sites. Within these communications, which must comply with all applicable telemarketing restrictions, be sure to advise customers of the additional safety measures you have implemented, so that they have peace of mind. Roadster.com puts it this way:

Describe your plan for keeping your employees and customers safe both in your store and during at-home interactions. This can be posted on your website and might detail additional cleaning schedules, increased hand-washing, hand sanitizer availability, and adjusted in-store policies to accommodate social distancing.

If you have changed your policies around test drives to allow for less employee contact, include that message. If you offer remote test drives and/or home delivery, provide information on how you are sanitizing and following recommended social distancing practices during these interactions.

Dealerships may require, or may be required by a state or local order, to have customers schedule appointments with the sales department to ensure adequate social distancing. The CDC currently recommends maintaining a distance of at least 6 feet from others—and to limit gatherings to 10 people or fewer. Some dealerships bring vehicles to customers' homes to allow for test drives, as noted above. To protect yourself and your customers, ensure that you have very limited physical contact.

If you offer remote test drives and home delivery services, the employees you send out to fulfill these services need to be safe too. Provide gloves for when they handle the vehicle or customer paperwork and

for wiping down the vehicle with disinfectant wipes after a remote test drive. If you are offering remote test drives, you may want to consider letting the customer drive alone during the pandemic.

You might also consider split shifts or remote work to limit employees' exposure. Remote work, for example, fits such activities as internet sales (see below) and BDC functions. Train BDC and internet people to walk customers through the online car-buying process. You might even video responses to inbound leads. Humanize the process in any way you can. Personal connections are especially welcome. Remote teams can also mine your database, focusing on equity mining, lease returns, and high-payment loans.

Roadster.com advises to “focus your showroom team on their book of business,” which is to say, check in on your customers. Find out if they're OK. It's not only a kind gesture, but a way to learn what they need that you can help with. A customer who is hurting financially might appreciate an offer to ease the payment burden. A customer who's supporting an essential business might need a more reliable vehicle.

A great suggestion from Roadster.com for dealers with staffing concerns: If your service department is open but sales isn't, consider using a sales associate or two in the service department. They can review ROs and identify situations where it may be more economical for customers to buy or lease rather than invest in costly repairs.

According to Roadster.com, maintaining your culture is “by far the most challenging thing to do right now, especially for businesses that have had to close down and lay off or furlough a good portion of their staff temporarily. In these situations, empathy and transparency are always the best plan of action. To do this, communication is key. Consider connecting via video conferencing on a regular basis.”

Online Sales

As noted above, states (and possibly counties and localities) vary widely regarding in-dealership vehicle sales during this crisis. Online sales and remote deliveries are not universally permitted even absent a pandemic. Many jurisdictions require that licensed vehicle sales occur at licensed locations and/or that dealers maintain a physical area to display vehicles

offered for sale. Online sales may be restricted in some localities where all sales are prohibited by government order. Dealers should check with their state and metro associations for further information on government orders related to COVID-19 and on licensing restrictions governing online sales.

If allowed to conduct online sales, this is the time to focus on digital retailing. If you're already doing it, double down. If you're new at it, seize the opportunity to learn. Showroom traffic is bound to be light, but e-commerce allows you and your customer to keep moving forward in the purchasing process.

Again, just as you do with service and in-dealership sales, let your customers and prospects know that you are open for online business. Send out an email describing what you can offer—online purchasing, remote test drives, home delivery, etc. Include information about your safety measures. And remember to comply with telemarketing restrictions that apply to emails, text messages, phone calls, and other forms of communication.

BE VERY CAUTIOUS with respect to any pre-recorded phone calls or text messages to consumers related to the pandemic. The Federal Communications Commission (FCC) has recently expressed concern about unnecessary calls or text messages and in March 2020

issued a ruling on what *automated text messages or robocalls* are permissible under the Telephone Consumer Protection Act (TCPA) "emergency" exception. While confirming that the COVID-19 pandemic constitutes an "emergency" under the TCPA, the ruling permits only *very limited* types of communications from hospitals and governmental agencies and *not* dealer communications, *even if solely related to COVID-19*. While you may continue to communicate with your customers as permitted under law, exercise caution with pre-recorded calls and any text messages. Also, federal and state authorities view unfavorably *any* marketing effort that is even remotely misleading with respect to COVID-19, or that uses the pandemic in a way that could confuse or mislead consumers.

Your website should have photos, exterior and interior, of the vehicles your dealership sells, plus 360-degree videos and reviews. When a customer calls or submits an internet lead, find the vehicle referenced or curate a list of VINs for consideration and share what you've found with the customer. Once you've learned what the desired down payment is, and whether the customer wants to lease or buy, you can put together the exact configuration of the deal—all completely online.

You can then have the customer click to schedule a remote test drive, make an offer on the trade-in, and/or begin the financing process.





Customers should receive firm offers on their trades in a contactless way. Suggest that customers upload pictures of the trade, so that you are comfortable with the offer without actually seeing the vehicle in person.

Online buying solutions make applying for credit easy. When a secure means of transmission is present, customers can complete online credit applications to finalize the deal and even upload driver's licenses and insurance cards. Many dealers have existing procedures for home delivery and remote sales. If you do not, consult with your attorney to ensure that you have taken into account all requirements under state and federal law, the agreements with your finance sources, and state and local restrictions with respect to COVID-19.

Two important federal issues to consider are the Federal Trade Commission (FTC) Red Flags and related rules, and the FTC's Cooling Off Rule. These relate to two separate issues: The first is about confirming the identity of an individual to ensure that your dealership is not the victim of an identity theft scam; the second relates to federal consumer protections for "door-to-door" sales.

The Red Flags Rule requires you to have procedures in place to identify, detect, and respond to relevant indicators of possible identity theft. The Rule must be carefully considered in an online environment. Basi-

cally, the Rule requires that you take certain steps to verify the identity of an individual who leases a vehicle or purchases with credit. Many of these steps can be difficult in person, but you should ensure that the delivery of a financed or lease vehicle includes a physical check of identity documentation (accounting for and observing the hygiene rules outlined above) and the potential use of "out-of-wallet" questions to the consumer. Unfortunately, the COVID-19 pandemic has resulted in fraudulent activity of all kinds, so dealers must take steps necessary to protect their customers and themselves.

If triggered, the FTC Cooling Off Rule requires additional disclosures and provides for consumer contract rescission rights. The FTC has indicated that the mere act of obtaining a customer signature at the time of delivery should not implicate the Cooling Off Rule. However, dealers should ensure that all aspects of the transaction (trade, F&I, final price, etc.) are fully negotiated prior to vehicle delivery, and that delivery includes only the ministerial act of obtaining a signature for a fully negotiated transaction (along with identity verification and other procedures as outlined above). No further negotiation or sales activity should take place at the time of delivery as it could be deemed a "door-to-door" sale, thereby implicating the Cooling Off Rule.

The procedural and regulatory steps used in the context of an in-person sale exist for a reason. Ensure that the delivery process at a customer's home address adheres to those procedures to the extent possible.

Consult your attorney and your state or metro association for further guidance on state "door-to-door" sales rules. For additional information, consult NADA's [A Dealer Guide to the Red Flags and Address Discrepancy Rules: Protecting Against Identity Theft](#).

As for F&I, Roadster.com offers the following suggestions:

Don't forget about backend products. Service and protection plans are a big part of any vehicle sale. Given how much of this transaction may need to happen online, it is important that you have your plans front and center with brochures and videos for customers to educate themselves on what is available. They can add any products they are interested in to their online purchase. Awareness is the first step, and the more they are aware, the more likely they are to buy.

However, don't wait for the customer to self-select. Make sure your remote BDC or internet team is educated on these products and can walk a customer through the benefits via phone or video conference where they can share their screen if need be.

Given the current crisis, customers will be more risk-averse than ever. Protecting their vehicle with a small bump in monthly payment or adding a pre-paid maintenance plan may be something they are even more open to now.

To complete a purchase online, customers should review and accept the final deal sheet with numbers based on their approved credit. Backend tools are available for your sales team to make necessary adjustments based on availability, pricing, applicable discounts, and rebates. As with other transactions, it is essential that dealers provide all required disclosures and ensure that procedures are in place to comply with federal and state laws that apply to the offering and sale of voluntary protection products. Again, as outlined above, negotiations and sales should be fully finalized prior to delivery to the customer's home. For additional information, consult

the optional [NADA/NAMAD/AIADA Model Dealership Voluntary Protection Products Policy](#).

If you are in a state that does not allow home delivery, take a reservation. With online buying, customers can not only reserve vehicles but place deposits on them for future pickup or delivery. You can decide with the customer how large the deposit should be and how long you will hold the vehicle once you reopen.

In several states with showroom activity restrictions, questions exist regarding how dealers should handle lease returns. Work carefully with consumers and leasing companies to resolve customer concerns. This may include helping to arrange lease extensions, alternative return arrangements, and other considerations.

One last note: Find out if your OEM offers programs to help customers who may be suffering financial hardships because of this pandemic, yet still need to buy a car or make payments. Many OEMs and captive finance companies have initiated programs to assist, or will do so shortly. You can integrate these OEM resources into your messaging to alert both new and existing your customers about their options.

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