Overview

Small and medium (especially non-chain) establishments such as banks, notary offices, title companies etc. have been very challenged during the COVID-19 pandemic. These businesses supply a service which in many cases involves a face-to-face interaction to complete a critical transaction that does not involve the hands-on purchase of tangible goods and services.

Many establishments have been creative in encouraging online transactions, drive-thru services, and the utilization of video tools (e.g., FaceTime, Zoom, and Skype) to provide personal customer service. However, many have been forced to lay off or furlough key employees, which may complicate re-opening as states start to relax shelter-in-place and stay-at-home restrictions. With such restrictions beginning to lift, these owners are faced with difficult questions that must be addressed before reopening, such as:

- How can we protect our employees and customers from the virus when entering our facility?
- How do we assure our customers that we are doing all we can to protect them from the virus?
- How can we minimize the risk of disease transmission if those that are ill, or those who have had contact with positive COVID-19 people, shop or visit our places of business?
- What do we do if a customer is sick or not following the guidelines?
- How do we deal with customers that request cash, need a signature to complete a transaction, a meeting with a representative, or leave the establishment with official paperwork associated with the customary transaction process?

SARS-CoV-2, the virus that causes COVID-19, is thought to be spread primarily through aerosolized respiratory droplets at close range. Airborne transmission from exposure to very small droplets over long distances is unlikely. However, there is evidence that this mode of transmission is possible, particularly in crowded, indoor spaces. People may also become infected by touching contaminated surfaces. The virus has been shown to survive in aerosols for hours and on surfaces for days. Infection can occur through eyes, nose, and mouth exposures. There is also strong evidence that people can spread the virus while pre-symptomatic or asymptomatic.

Measures can be taken to reduce the risk of transmitting COVID-19 from touching surfaces, from person-to-person spread through aerosolized respiratory droplets, and from providing the customer with paperwork or cash upon completing a transaction. Clear communication of controls being implemented for customer and employee health via social and digital media is critical before these establishments can re-open safely.

Many of these establishments must remain open to accommodate certain financial and legal operations that require in-person contact. For example,

- Opening a new bank account or obtaining a cashier’s check or other bank services that cannot be done online.
- Closing on or refinancing a home, purchasing a new vehicle or other legal transactions that may require in-person notary services.
- Preparing wills or other legal matters.
- Receiving financial advice.

What should an Employer do to protect themselves and their customers?

Owners should continually monitor global (World
Health Organization [WHO]), federal (Centers for Disease Control [CDC] and Occupational Safety and Health Administration [OSHA]), state, and local guidelines for changes in recommendations, disinfection strategies, worker protections and other best management practices. Employers should consider forming a knowledgeable team to monitor, assess, and implement new strategies as they become available. In addition, employers should consider the following strategies for reducing the risk of COVID-19 transmission in regards to physical distancing, ventilation, enhanced cleaning and disinfecting practices, restrooms, lunch/break areas, shared contact surfaces, personal hygiene, employee wellness, personal protective equipment (PPE), training, waste and laundering, and communication. Due to the wide variety of these establishments and sizes, it may not be possible for establishments to implement all of the following; however, trying to tackle the problem from multiple angles can help reduce health risks.

**Physical Distancing**

- Consider all options possible to minimize direct employee/customer interface:
  - Encourage online banking, direct deposits, wire transfers, drive-thru banking, etc. to minimize face-to-face interactions. Fully communicate to customers the services available and how this will help protect them from the potential spread of COVID-19.
  - Consider additional employee precautions for any in-home visits to customers who may be incapacitated due to age or infirmed due to illness or disease requiring personal services. (Situation where electronic methods are unavailable).
  - Full utilization of ATMs and other electronic mechanisms (NOTE: consider a means to clean and disinfect these devices after each use and instruct employees to apply an alcohol-based hand sanitizer that contains at least 60% ethanol or 70% isopropyl alcohol, and/or to wash their hands directly after using these machines.)
  - Consider utilizing DocuSign or other online services to finalize legal paperwork versus requiring an in-person signature.
  - Consider utilizing virtual online mechanisms to verify necessary documents and for customer validation.
  - Consider electronic pre-pay or other means to minimize the need for cash or limit the need for on-site credit card machines or signatures. When on-site credit card machines or signatures are used, have a means to clean and disinfect this equipment and pens after each use.
  - Consider early hour services for the elderly or other vulnerable populations.
  - Use social media and other communications (signage/email/text lists) to educate customers/clients on the steps being taken for their protection.
  - Crowd control: mark distances using tape/markers/paint/signage of 6 feet for customers in checkout and indoor and outdoor waiting areas.
  - Video, photos, and markings are ideal to demonstrate distancing measures.
  - Request customers make appointments for lobby access and limit the number of customers in the building at one time, based on the size of your establishment.
  - When it is necessary for people to enter the establishment, configure the space with appropriate physical distancing in mind.
  - Distance counters or transaction locations to 6 feet or more and place markings on the floor showing customers where to stand in line.
  - Consider physical distancing while at the teller station. Patrons can step back away from the counter while a transaction is being made.
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– Consider placing plastic partitions between counters/transaction locations and elsewhere to separate employees and customers.

– Place signs at the entrance to inform the customers of the requirements.

• Train employees on physical distancing.
  – Make this a key point at greeting: “Hello, thank you for coming in. We are here to help you, but we will be at distance of 6 feet for your safety.”

• For scheduled services (e.g., house/auto closing, setting up a checking account, etc.) have customers sit outside (in their vehicles if possible) until either called or texted to let them know that you are ready for them and that the space has been cleaned and disinfected.

• Ensure appropriate physical distancing between employees and clients at all times during transactions.

• When it is necessary to give the customer paperwork to confirm their transaction, consider placing the documents in disinfected plastic covers

Ventilation

• Provide natural ventilation by opening windows and doors whenever possible to increase air flow. If windows and doors cannot remain open, provide good indoor air quality by:
  – Keeping HVAC system operational to maintain thermal comfort and maximize outdoor air based on system design.
  – Maintaining the relative humidity at 40-60%.
  – Limiting the use of portable pedestal or overhead ceiling fans.

• If you need assistance on HVAC issues, ask an HVAC professional and see the American Society of Heating, Refrigerating, and Air-Conditioning Engineers’ (ASHRAE) COVID-19 (Coronavirus) Preparedness Resources updates for more information.

– AIHA Occupational and Environmental Health and Safety (OEHS) Science Professionals and industrial hygienists are also well versed in general dilution ventilation. AIHA has a consultants list of such qualified professionals.

• Consider using portable HEPA filtration units.

• If fans, such as pedestal fans or hard mounted fans are used in the store, take steps to minimize air from fans blowing from one person directly at another individual. If fans are disabled or removed, employers should remain aware of, and take steps to prevent heat hazards.

Enhanced Cleaning and Disinfecting Practices

• Select appropriate disinfectants – consider effectiveness and safety.
  – The U.S. Environmental Protection Agency (EPA) has developed a list of products that meet EPA’s criteria for use against SARS-CoV-2.
  – Do not mix different EPA registered chemicals together. The combination could be toxic by inhalation. Be particularly careful when using any products containing ammonia, sodium hypochlorite (bleach), or hydrogen peroxide.
  – Review product labels and Safety Data Sheets (SDS) and follow manufacturer specifications for cleaning/disinfecting.
  – Consider consulting an Occupational and Environmental Health and Safety (OEHS) Science Professional or Industrial Hygiene expert if additional advice is needed. AIHA has a consultants list of such qualified professionals.

• Establish a disinfection routine.
  – Ensure disinfection protocols follow product instructions for application and contact time. All items should be allowed to dry thoroughly after cleaning.
  – Use disposable wipes or rags when available. If not available, ensure rags are maintained, handled, and cleaned per product instructions.
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Consider developing a standard operating procedure, a checklist, or audit system to consistently train employees on enhanced cleaning/disinfecting practices or to track when and how cleaning and disinfecting is conducted. Note that this may be a requirement in some states or local jurisdictions.

Promote these practices to customers – provide appropriate signage.

- All surfaces where direct customer interaction take place should be visibly cleaned and disinfected on a frequent/regular basis (e.g., bank teller areas, desks where there is a customer interface, etc.).

Restrooms

- Post signage limiting restroom occupancy to allow for proper physical distancing and to remind employees and customers to wash hands before and after using the restroom.
- Minimize touchpoints entering and existing restrooms, if possible.
- If the door cannot be opened without touching the handle, provide paper towels and a trash can by the door so a paper towel can be used when touching the handle and then discarded.
  - Consider controlling access to bathrooms with a key so disinfection measures can be better managed. If a key is used, consider disinfecting it after each use.
- Doors to multi-stall restrooms should be able to be opened and closed without touching handles if possible.
- Place signs indicating that toilet lids (if present) should be closed before and after flushing.
- Use no-touch faucets, towel dispensers, soap dispensers, and waste receptacles when possible.

- Hand soap should be readily available for use by occupants.
- Provide paper towels and air dryers in restrooms.¹
  - The WHO and CDC currently state that hands can be dried using a paper towel or hand dryer.
  - Due to current uncertainties surrounding the transmission of SARS-CoV-2, care should be taken when using a hand dryer or paper towel.
  - The use of touch or push hand dryers is discouraged due to possible surface contamination. If hand dryers are used, consider touchless devices.
- Businesses and employers should work with HVAC professionals to ensure that bathrooms are well ventilated, and if filtration is used, that proper filtration practices are being followed.
- Increase frequency and efforts to keep bathrooms clean and properly disinfected and maintain a record of sanitary work practices.

Personal Hygiene

- Establish a “before- and after-service” hand washing or sanitizing for all employees.
- Provide hand washing stations or, if not feasible, hand sanitizer that contains at least 60% ethanol or 70% isopropyl alcohol at the front of the establishment, prominent locations and point of interface with customers.
- Make hand sanitizer stations available throughout work and public places. Stations should also be placed in convenient locations, such as at entrances, exits, near elevators, and restrooms. Touch-free hand sanitizer dispensers should be installed where possible.
- At minimum, employees should wash their hands after they have been in a public place, after touch-

¹NOTE VERSION CHANGE: In version 1 of this guidance document, in the section titled “Restrooms” it stated to disconnect or tape off the hand dryer.
Employees should wash hands with clean, running water, apply soap, lather and scrub for at least 20 seconds, then rinse. Dry hands using a clean paper towel or air dry. When soap and water can’t be used, use an alcohol-based hand sanitizer that contains at least 60% ethanol or 70% isopropyl alcohol. Any use of alcohol-based hand sanitizers should follow local and State guidelines.

Employee Wellness

- Health checks and reporting requirements of individuals infected with COVID-19 should be explained to employees prior to reopening and again once operations have resumed.
- Communicate to employees the importance of being vigilant when monitoring symptoms and staying in touch with their employer or manager if or when they start to feel sick.
- Revisit your leave or sick program to allow for time off and follow all HR Policies and HIPAA/other regulatory requirements.
- Conduct employee temperature screening and wellness checks before each shift. (NOTE: be sure to comply with OSHA’s Access to Employee Exposure Medical Records standard for confidentiality.)
  - Temperature screening methods can include manual (use non-contact infrared thermometers) or thermal camera meeting FDA recommendations. Additional screening information/guidance can be found on the CDC website.
  - Assign an employee to manage and conduct the temperature screenings while following CDC guidelines in the above link. If this is not possible, employees can self-check their own temperature.
- Screening should be done in a manner such that the privacy of employees is respected.
- Perform a visual inspection for other signs of illness (e.g., flushed cheeks, rapid or difficulty breathing without recent physical activity, fatigue, extreme fussiness, cough).
- Employees who have a fever of 100.4° F (38° C) or above, or other signs of illness should not be admitted to the facility.
- Employers can consider incorporating a wellness questionnaire with questions such as:
  - Have you, or a person you have been in close contact with, been diagnosed with COVID-19 within the last 14 days? (close contact is 6 feet or less for more than 10 minutes.)
  - Have you experienced any cold or flu-like symptoms in the last 72 hours (to include fever, shortness of breath, cough, sore throat, difficulty breathing, nausea, vomiting and diarrhea)?
  - Have you traveled to an international or domestic “hot” spot in the last 14 days?
  - There are a number of examples available for wellness questionnaires (see Resources below).
- Require employees who have symptoms or signs (i.e., fever, cough, or shortness of breath) or who have a sick family member at home with COVID-19 to notify their supervisor and stay home.
- Sick employees should follow the CDC-recommended steps. Employees should not return to work until the criteria to discontinue home isolation are met in consultation with healthcare providers and state and local health departments. Consider waiving requirements for medical documentation during the pandemic, as CDC has advised people with mild illness NOT to go to the doctor’s office or emergency room.
- If employee is sick or receives positive COVID-19 test results, results should be reported to employer.
In the case of a positive COVID-19 test result, the employee must stay home until cleared for physical return to the workplace by their medical provider, following the CDC’s Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings.

- If an employee tests positive:
  - Follow federal, state, and local recommendations for reporting and communicating cases, while remaining compliant with regulations and guidelines pertaining to protecting private health information such as confidentiality required by the Americans with Disabilities Act (ADA). See OSHA for guidance on reporting workplace exposures to COVID-19.
  - Engage HR immediately and enforce all applicable HR rules and regulations.
  - The employee shall be isolated to the area they are in currently and removed from the work site for a minimum of 14 days.
  - Any individuals having “close contact” (within approximately 6 feet) with the employee should also be isolated from the work site for 14 days; and all other employees should continue to follow physical distancing rules. Communicate and reinforce with employees, while maintaining PII and HIPAA requirements, that they may have been exposed and to closely monitor their health, temperature, and current symptoms as identified by the CDC. Contact tracing and sharing of employee information should be done under the guidance of Human Resources due to privacy requirements of HIPAA, ADA, and EEOC. See the CDC’s “Coronavirus Disease 2019 (COVID-19) General Business Frequently Asked Questions”.
  - Enhanced cleaning and disinfecting should be done immediately by trained personnel, who should wear face coverings and gloves, dispose of gloves after use, and wash hands and face when complete. Visibly dirty surfaces shall be cleaned using a detergent or soap and water PRIOR to disinfection.
  - For disinfection, use only EPA-registered disinfectants on List-N.
  - Encourage those who are sick or at greater risk to stay home. This includes:
    - People with underlying medical conditions.
    - People who live with elderly people or those who are at risk.
    - People with upper respiratory or flu-like symptoms or who live with someone with these clinical symptoms.
    - People with COVID-19, people who live with someone with COVID-19, or who have been exposed to someone with COVID-19.
  - Employers should educate employees to recognize the symptoms of COVID-19 and provide instructions on what to do if they develop symptoms. At a minimum, any worker should immediately notify their supervisor, their health care provider, and the local health department, who will provide guidance on what actions need to be taken.

Other Control Measures

- Although not necessary if hand-washing protocols are rigorously followed, consider providing gloves to employees.
  - If they are worn, they must be changed regularly and are not a substitution for hand washing.
- Depending on local requirements, in alignment with CDC recommendations, encourage all employees to wear a cloth or disposable face covering whenever physical distancing cannot be maintained (indoors or outdoors). Ensure the face covering is properly maintained and cleaned. Additional information on cloth face coverings can be found on CDC’s website. [NOTE: Cloth or disposable face coverings primarily protect other people. A cloth
or disposable face covering is not a substitute for physical distancing.)

- With the exception of children less than two, and individuals who have difficulty breathing, are unconscious, or otherwise unable to remove a face covering without assistance, CDC recommends that all people wear a cloth or disposable face covering in public settings and when around people who don’t live in their household, especially when other physical distancing measures are difficult to maintain.

- Non-medical cloth or disposable face coverings or cloth or disposable face coverings are NOT Personal Protective Equipment (PPE), but they do offer some protection to others and should be worn while near other people in common spaces or shared workspaces. They are not a substitute for physical distancing, engineering controls, cleaning and disinfecting, proper hygiene, or staying home while sick.

- Remove cloth or disposable face coverings correctly and wash hands after handling or touching a used face covering.

- Wash cloth face coverings after each use. Cloth face coverings can be included with regular laundry. Use regular laundry detergent and the warmest appropriate water setting for the cloth used to make the face covering. Use the highest heat setting and leave in the dryer until completely dry. If air drying, lay flat and allow to completely dry. If possible, place in direct sunlight.

NOTE: If an employer chooses to provide or the employee supplies their own N95 respirator, please fully consider all the potential OSHA requirements.

- Consider splitting bank departments into separate teams to ensure that critical functions can always be handled. Many banks have formulated “A,” “B,” and “C” teams to further facilitate this split. Also, executive management should assess participating in a scheduled rotation.

Training

- Provide instruction and training to employees on how to:
  - Properly put on and remove gloves.
  - Clean and disinfect surfaces according to product specifications.
  - Correctly use cloth or disposable face coverings and/or respirators.

- Provide Safety Data Sheets (SDS) for cleaning and disinfection products and ensure employees are aware of the hazards of use. Incorporate new hazards into existing OSHA Hazard Communications Program.

- Employees should receive, at minimum, awareness training on cleaning and disinfection products used in the workplace following OSHA Hazard Communication Standards. For employees who will use cleaning and disinfecting products, training should also include proper use, PPE, disposal, and all precautionary measures.

- Implement and inform employees of supportive workplace policies as applicable:
  - Flexible sick leave policies consistent with public health guidance. Providing paid sick leave is an important way to encourage employees to stay home when sick.
  - Consider not requiring a COVID-19 test result or a healthcare provider’s note for employees who are sick to validate their illness in order to qualify for sick leave. If you do require a doctor’s note from your employees to verify that they are healthy and able to return to work, be aware that healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely manner. Get more information related to the Americans with Disabilities Act during the COVID-19 pandemic.
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– Flexibility to stay home to care for a sick family member.

– Human resources policies consistent with public health guidance, and state and federal workplace laws. For more information on employer responsibilities, visit the Department of Labor’s and the Equal Employment Opportunity Commission’s websites.

– Employee assistance program and community resources to help employees manage stress and receive support.

– Encourage employees at increased risk for severe illness to request special accommodations to allow them to perform their job duties safely while also protecting sensitive employee health information.

• Post signs and reminders at entrances and in strategic places providing instruction on hand hygiene, respiratory hygiene, and cough etiquette. This should include signs with images for non-English readers, as needed.

• Ask employees to consider the following if they commute to work using public transportation:
  – Use other forms of transportation if possible.
  – If taking public transportation, maintain physical distancing and wear a cloth or disposable face covering.
  – Change commute time to less busy times if possible.
  – Wash hands before and as soon as possible after their trip.

Waste and Laundering

• Single-use items and used disinfection materials can be treated as regular waste, following regular safety guidelines.

• Any reused cloth materials should be washed and dried on the highest temperature setting allowable for the fabric.

• Deeper cleaning and disinfecting protocols should be developed and implemented in cases where confirmed cases of COVID-19 are discovered. Refer to AIHA’s Workplace Cleaning for COVID-19.

Communication

• Communicate to customers what the establishment is doing to mitigate the spread of COVID-19. (e.g., disinfection routine, health policies for employees, and health and safety measures in place).

• Consider communicating to customers (e.g., those who may be taking care of someone who is COVID-19 positive, exhibiting symptoms of COVID-19, being in a high-risk category, etc.) that in-person interactions may not be a good option and alternative methods that they can use to complete their transactions.

• Communicate that the establishment has the right to refuse service to anyone exhibiting symptoms or not following guidelines (e.g., physical distancing).

• Platforms for communication could include websites and indoor/outdoor signage.

What should an Employee do to protect themselves and the customer?

• Employees should evaluate their health continuously; if they are sick, have a fever or symptoms, or someone at home is sick, then they should remain home. NOTE: Employer HR Policies, HIPAA guidelines and other laws should be followed at all times.

• Maintain cloth or disposable (or better if you have it) face covering, clean or replace frequently, and use at minimum when unable to maintain physical distancing of 6-feet.

• Maintain good hygiene practices (washing hands with soap and water for at least 20 seconds or a hand sanitizer with at least 60% ethanol or 70% isopropyl alcohol). For more information, refer to CDC’s handwashing guidelines.
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- National Association of Tax Professionals COVID Guidance (Business Continuity Tips)
- Mortgage Bankers of Association COVID-19 Business Continuity Resources
- Consumer Bankers Association COVID-19 Resource Hub
- Independent Community Bankers of America Guide
- National Notary Association COVID-19 Bulletin
- American Society of Notaries - Procedures During COVID-19 Pandemic
- CDC Health Screening “Should we be screening employees for COVID-19 symptoms?” section of General Business Frequently Asked Questions
- Numerous wellness questionnaire examples are available online (e.g., South Dakota Department of Health’s COVID-19: Employee Screening Questions and Guidelines)
- The EPA has developed a list of disinfectants for use against SARS-CoV-2.
- ASHRAE has a list of COVID resources for commercial buildings.
- AIHA's Indoor Environmental Quality Committee developed these guidance documents about reopening and cleaning buildings after closures due to COVID-19: Recovering from COVID-19 Building Closures and Workplace Cleaning for COVID-19
- AIHA’s Considerations on the Safe Use of UVC Radiation
- AIHA’s Focus on Construction Health: COVID-19
- AIHA’s Effective and Safe Practices: Guidance for Custodians, Cleaning and Maintenance Staff
- AIHA’s Employers Guide to COVID-19 Cleaning & Disinfection in Non-Healthcare Workplaces
- AIHA’s Reducing Risk of COVID-19 Using Engineering Controls
- AIHA’s PPE for SARS-CoV-2
- AIHA’s Use of Real Time Detection Systems
- AIHA’s Proper Use of Respirators for Healthcare Workers & First Responders
- AIHA’s Workers Rights White Paper

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About Occupational and Environmental Health and Safety Professionals

Occupational and environmental health and safety (OEHS) professionals (also known as industrial hygienists) practice the science of anticipating, recognizing, evaluating, controlling and confirming workplace conditions that may cause workers’ injury or illness. Through a continuous improvement cycle of planning, doing, checking and acting, OEHS professionals make sure workplaces are healthy and safe.

- Get additional resources at AIHA’s Coronavirus Outbreak Resource Center.
- Find a qualified industrial hygiene and OEHS professionals near you in our Consultants Listing.
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These guidance documents were primarily developed for those smaller business that don't have readily available occupational health and safety resources, and designed to help business owners, employers, employees and consumers implement science-backed procedures for limiting the spread of the coronavirus. They are subject to any local, state, or federal directives, laws, or orders about operating a business and should only be used if they do not conflict with any such orders. These documents are subject to revision and shall be updated accordingly.

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