

Dealer Advisory

April 14, 2020



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A regularly updated "**Coronavirus Toolkit**" is available within the MADA website. [Click here](#)

New Resources to Help Navigate the Unemployment Insurance Process

Many dealerships are finding challenges in their efforts to support employees who are navigating the unemployment insurance process. Both the federal government and the Michigan Unemployment Insurance Agency have recently updated and created new resources to assist employers and employees.

The U.S. Department of Labor published a letter providing guidance to states about the Federal Pandemic Unemployment Compensation (FPUC). This program allows states to provide an additional \$600 weekly payment to certain eligible individuals who are receiving other benefits.

- [U.S. DOL Press Release](#)
- [Unemployment Insurance Guidance Letter 15-20](#) (UIPL)

Resources from the Michigan Unemployment Agency

The State of Michigan has created new documents to provide information about the additional \$600 payments and help with other unemployment insurance questions.

- This [one-page handout](#) provides a quick overview of the expanded eligibility under the CARES Act.
- A new [fact sheet](#) provides details about eligibility, when and how to file and what information must be filed.
- The Unemployment Insurance Agency has updated its tutorial videos for: [Employees](#) and [Employers](#)

UNEMPLOYMENT INSURANCE File Your Claim By Last Name	
ONLINE SCHEDULE: michigan.gov/uia WEBSITE IS 24/7	CALL CENTER SCHEDULE: 1-866-500-0017 8AM-6PM MON-FRI, 7AM-2PM SAT
A-L FILE CLAIMS Monday Wednesday Friday	M-Z FILE CLAIMS Sunday Tuesday Thursday
Saturday if you missed your days	
A-L CALL ON Monday & Wednesday	M-Z CALL ON Tuesday & Thursday
Friday and Saturday if you missed your days	

The day or time of day in which a claim is filed will not impact whether you receive benefits or your benefit amount. Additionally, your claim can be backdated to reflect the date you were laid off or let go due to COVID-19.

- UIA also offers FAQs for: [Employees](#) and [Employers](#)

Due to an unprecedented need for unemployment benefits, the agency's website has struggled to keep up with the demand. To help avoid technical difficulties users are asked to file on a schedule by last name. Please see this [press release](#) for more information or view the image above.

Temporary Extension of Expiring Driver's Licenses, State ID Cards, Vehicle Registrations

Governor Whitmer has signed [Executive Order 2020-47](#), temporarily extending the expiration of

valid driver's licenses, state identification cards and commercial vehicle registrations that would otherwise expire during the state's COVID-19 emergency declaration.

The order, which took effect April 13 at 11:59 p.m., temporarily extends:

- Commercial vehicle registrations, including temporary registrations set to expire on or after March 1, 2020 to June 30.
- Driver's licenses, learner's permits and commercial driver's licenses set to expire between March 1 and May 31, to June 30.

The temporary extension does not apply to motorists with suspended or revoked driver's licenses.

We have confirmed with the SOS that this new executive order includes the same June 30 extension for BFS-4 temporary tags used by dealerships.

Safely Operating Your Dealership During a Pandemic

New Dealer Guide from NADA



NADA's newest dealer guide, *Safely Operating Your Dealership During a Pandemic*, includes some federal considerations related to remote and electronic sales that dealers need to keep in mind.

...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. Basically, 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) 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....

Get more information by reading the complete NADA guide and viewing Wednesday's webinar...

DEALER GUIDE: Safely Operating Your Dealership During a Pandemic

This guide helps dealers maintain essential operations while minimizing unnecessary risks. The guide provides information from reliable sources including the Centers for Disease Control and Prevention for keeping employees and customers safe during the pandemic; cleaning and disinfecting dealership facilities and vehicles; and safely handling service and sales operations.

[Download the Guide](#)

WEBINAR: Legal & Regulatory Implications of Online Sales

Wed., April 15 | 1-2pm ET

In today's world, online sales and remote deliveries have taken on a vital new importance for many dealers, and whether you are new to online sales or have been doing them for years, there are a number of critical issues to consider and pitfalls to avoid.

Discuss a number of important legal and regulatory issues and concerns dealers must know to stay compliant in this new

Please feel free to contact DADA at (248) 643-0250 or MADA at (800) 292-1923 if you have any questions.

*This advisory has been prepared in conjunction with
Colombo & Colombo, P.C., and Abbott Nicholson, P.C.*

Michigan Automobile Dealers Association

1500 Kendale Boulevard, P.O. Box 2525

East Lansing, MI 48826-2525

www.michiganada.org

Phone (517) 351-7800

Fax (517) 351-3120

Detroit Auto Dealers Association

1900 West Big Beaver

Troy, MI 48084-3537

www.dada.org

Phone (248) 643-0250

Fax (248) 643-8788