

**STATE OF MICHIGAN  
DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES**

**Bulletin 2020-11-BT/CF/CU**

**In the matter of:**

**Executive Order 2020-21:  
Essential Financial Services**

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**Issued and entered  
this 30<sup>th</sup> day of March 2020  
by Anita G. Fox  
Director**

On March 10, 2020, Governor Whitmer issued Executive Order 2020-04, which declared a state of emergency across the State of Michigan due to the COVID-19 pandemic. On March 23, 2020, Governor Whitmer issued Executive Order 2020-21, directing Michigan residents to remain at home or in their place of residence, with limited exceptions. Executive Order 2020-21 took effect on March 24, 2020 at 12:01 a.m. and continues through April 13, 2020 at 11:59 p.m.

Executive Order 2020-21 broadly prohibits in-person work with a narrow exception for critical infrastructure workers to continue in-person work in certain sectors necessary to sustain or to protect life. These workers include some workers in the financial services sector as described in the guidance of March 19, 2020 on the COVID-19 response issued by the Director of the U.S. Cybersecurity and Infrastructure Security Agency ([CISA Guidance](#)) referenced in Executive Order 2020-21.

This Bulletin is issued solely to provide guidance on the specific industries included within the term “financial services” as used in the Executive Order. Consistent with Executive Order 2020-21, work is to be done remotely to the fullest extent possible, and in-person work is permitted only in accordance with social distancing and other requirements of the Executive Order for those conducting their jobs as critical infrastructure workers and those non-critical infrastructure workers designated to maintain minimum business operations. Subject to the requirements of Executive Order 2020-21, the term “financial services” as used in Executive Order 2020-21 means:

- Banks, credit unions, and consumer financial service providers (e.g. mortgage companies, money transmitters, payday lenders, consumer installment lenders, sales finance lenders, debt management companies, and pawnbrokers).
- Bond issuers.
- Title companies, inspectors, appraisers, surveyors, registers of deeds, and notaries.

Under Executive Order 2020-21, real estate brokers and agents do not constitute “critical infrastructure workers” and thus may not leave their homes for work unless, under section 9(d) of the order, they are “provid[ing] food, shelter, and other necessities of life for economically disadvantaged or otherwise needy individuals, individuals who need assistance as a result of this emergency, and people with disabilities.”

Otherwise, services by real estate agents, brokers, and, real estate service workers must be conducted remotely. Appraisers, surveyors, and real estate agents, brokers and real estate service workers are regulated by the Michigan Department of Licensing and Regulatory Affairs; notaries are regulated by the Michigan Secretary of State. These persons and entities should contact their respective regulators with any questions.

Any in-person business operations must abide by all applicable conditions in Executive Order 2020-21, such as social distancing practices and other mitigation measure to protect workers and patrons. Businesses in the financial services industry that remain open for in-person work must take aggressive steps to minimize the spread of coronavirus, including but not limited to:

- Promoting remote work to the fullest extent possible.
- Restricting the number of workers present in-person on the job.
- Keeping employees at least six feet from one another to the maximum extent possible and enabling social distancing for customers who are standing in line.
- Any other social distancing practices and mitigation measures recommended by the Centers for Disease Control and Prevention.

Entities and persons regulated by DIFS must continue to comply with all applicable statutory and regulatory deadlines and requirements unless such deadlines and requirements are expressly waived or modified by the Director.

Companies regulated by DIFS that experience difficulty in meeting any statutory or regulatory deadline or requirement as a result of the COVID-19 pandemic must contact DIFS immediately.

Any questions regarding this Bulletin should be directed to:

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/s/

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