



## HUMANITARIAN COORDINATOR IN UKRAINE\*

### **Considerations for the safe re-opening of entry-exit crossing points in Donetsk and Luhansk oblasts following the easing of COVID-19 quarantine measures 11 May 2020**

Recognizing the importance of re-opening the EECPs in Donetsk and Luhansk oblasts, while at the same time protecting public health during a pandemic, the Humanitarian Country Team offers the following suggestions to the Government of Ukraine in developing its strategy for the safe re-opening of the EECPs. These suggestions draw on years of practical experience in working at the EECPs, consultations with persons affected by the closure and on international and Ukrainian legal standards, as well as the guidance of the World Health Organization. The document contains an annex with a checklist of risk mitigation measures.

#### Re-opening the entry-exit crossing points (EECPs)

Normally, the EECPs are busy: during 2019, an average of 38,000 people crossed the five EECPs in the east daily in both directions, and in summer months, the number of crossings is an average of 22 per cent higher than in winter. In the months of June-August 2019, there was an average of more than 1.5 million crossings per month.<sup>1</sup> In monthly surveys conducted at the EECPs, people state that they cross the EECPs for the following reasons: to obtain pensions, access banking, visit relatives, shop for goods or resolve issues with their documents. Among those crossing, nearly 60 per cent are older persons, and over 60 per cent are female.<sup>2</sup>

The EECPs in Donetsk and Luhansk oblasts have been closed since 22 March 2020. This has imposed hardship on hundreds of thousands of people. They long to visit their relatives and friends, homes and family gravestones. Many depend on traveling across the EECPs to go to work. Others need to cross the EECPs to receive their pensions, go to the bank, renew their documents, purchase medicine or obtain an education. Unable to cross the EECPs, many people, especially pensioners, have lost access to the income they use to buy food and medicine.

It is important to restore the smooth functioning of the EECPs in a safe manner as soon as the quarantine ends. This will preserve social cohesion and protect the rights of Ukrainian citizens, especially those residing in non-government-controlled areas (NGCA).

In accordance with international human rights law, any restrictions on freedom of movement related to the pandemic must meet the requirements of legality, necessity, proportionality and non-discrimination. Restrictions, such as the closure of the EECPs, should be strictly temporary in scope, the least intrusive to achieve public health goals and include safeguards

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\*The Humanitarian Coordinator in Ukraine leads the efforts of the international community through the Humanitarian Country Team, comprising the UN, national and international non-Governmental organizations, as well as international organizations, to ensure timely and effective response to the humanitarian crisis in eastern Ukraine.

<sup>1</sup> Data from the State Border Guard Service is collected in a dashboard at [http://bit.ly/CP\\_Crossings-UA](http://bit.ly/CP_Crossings-UA)

<sup>2</sup> Monthly surveys at the EECPs are conducted by the charitable fund "Right to Protection". The dashboard with 2019 survey data is available here: [http://bit.ly/CP\\_Monitoring\\_2019](http://bit.ly/CP_Monitoring_2019) and 2020 data is available here: <https://www.unhcr.org/ua/en/eecp-monitoring-2020>



to return to ordinary laws when the emergency situation is over.<sup>3</sup>

### Risks associated with both re-opening and prolonged closure of EECPs

Because large numbers of persons in high-risk groups congregate at the EECPs, the EECPs represent a high-vulnerability setting, where COVID-19 transmission needs to be minimized. Older persons face a higher likelihood of severe complications and fatality related to COVID-19.

In the weeks and months after re-opening of the EECPs, the number of people wishing to cross is expected to be larger than the previously recorded average because people have a backlog of issues they need to resolve. In particular, many residents of NGCA will want to cross to GCA for pension and banking services. This may increase the risk of transmission of COVID-19.

At the same time, there are significant risks associated with the prolonged closure of the EECPs: families are separated; many employed people cannot access their jobs at the other side of the line of contact; school graduates face the risk of not being enrolled in Ukrainian universities; older persons cannot access their pensions, which they use to meet basic needs; people with serious illnesses cannot access necessary medical treatment and life-saving medication.

### To mitigate these risks, four steps are recommended:

1. Establish a suitable set of indicators to inform evidence-based decisions about any restrictive measures at the EECPs.
2. Adopt measures to safely and progressively ease restrictive measures at the EECPs.
3. Mitigate the social and economic impact of the EECPs' prolonged closure. Note that these measures will reduce the pressure for people to rush to the EECPs upon re-opening and decrease the number of times they need to cross repeatedly.
4. Engage in timely, effective, evidence-based and honest communication about the restrictive measures at the EECPs.

#### 1. Evidence-based decision-making

Strategies to mitigate the risks associated with the re-opening of EECPs need to be evidence-based. This means any decisions about restrictive measures at the EECPs should be data driven.

For example, in considering the impact of restrictive measures at the EECPs, the Government could consider the following:

How many potentially did not receive birth/death certificates? How many could not access documentation services, receive or renew a passport? How many people have not been able to receive their pension, and what impact has this had on food security? How many did not access medical treatment? How many school graduates need to come for the external evaluation or to the educational centers for the simplified university enrollment?

In considering the impact on public health, the Government could consider the following:

Are there outbreaks in the areas where EECPs are located? What are the risks of importing or exporting the virus among communities along the contact line? How many suspected cases have been identified at the

<sup>3</sup> Office of the High Commissioner for Human Rights, *Emergency Measures and COVID-19: Guidance*, 27 April 2020, [https://www.ohchr.org/Documents/Events/EmergencyMeasures\\_COVID19.pdf](https://www.ohchr.org/Documents/Events/EmergencyMeasures_COVID19.pdf).



EECPs? How many confirmed cases? Which benchmark could be set (i.e., the critical number of cases identified daily/weekly) as a basis for the decision to impose more restrictive measures and for how long?

## 2. Safe and progressive easing of restrictions

An important risk mitigation strategy is progressive easing of quarantine-related measures. WHO recommends that “[m]easures must be eased in an incremental, step-wise manner leaving sufficient time (around 2 weeks) to elapse for the true impact of the easing to become fully visible.”<sup>4</sup> The gradual easing of restrictions starts with activities that pose a lower risk of transmission and moves to those that pose a higher risk.

### Risk: Transmission of COVID-19 among EECP personnel, persons crossing the EECPs or in nearby communities

Under the existing procedures at the EECPs, large numbers of persons gather in close proximity at certain points while crossing, e.g., in pedestrian queues and at bus stops. The inadequate provision of medical services at the EECPs is a longstanding issue.<sup>5</sup> State authorities do not provide primary medical services at the EECPs; these services are provided only by humanitarian organizations, and infrastructure is limited.

### Mitigation measures:

The physical layout and infrastructure at the EECPs must be reviewed to incorporate measures to prevent transmission of COVID-19, such as physical distancing, handwashing, respiratory etiquette and thermal monitoring. The flow of persons through the EECPs should be adjusted to avoid the formation of crowds. Furthermore, there must be sufficient public health capacities at the EECPs to identify and isolate suspected cases of COVID-19 infection, as well as provide first aid and medical referrals. The following measures may be adopted:

- Ensure that all staff working at EECPs, as well as service providers (such as medical staff, providers of transportation services and maintenance personnel), have personal protective items, undergo thermal monitoring regularly, adhere to respiratory etiquette and practice regular handwashing and sanitizing;
- Reorganize the flow of persons through the EECPs to allow for physical distancing; this may require enlarging resting and waiting areas;
- Increase the number of personnel of the State Border Guard Service (SBGS) at the EECPs, i.e. that all least all booths installed at EECPs are fully functional during all working hours, plus consider installation and staffing of additional booths (at least one per each EECP);
- Expand hygiene facilities so that there are multiple places for travelers and personnel to wash and sanitize their hands;
- Place information boards with recommendations on handwashing and sanitizing, as well as on respiratory etiquette, in places accessible to those crossing;
- Conduct thermal screening at crossing;
- Place medical personnel at EECPs with clear protocols regarding their roles in identifying, isolating, testing and treating all cases and to trace and quarantine contacts;

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<sup>4</sup> World Health Organization, *Strengthening and adjusting public health measures throughout the COVID-19 transition phases*. Policy considerations for the WHO European Region, 24 April 2020, <http://www.euro.who.int/en/health-topics/health-emergencies/coronavirus-covid-19/novel-coronavirus-2019-ncov-technical-guidance-OLD/coronavirus-disease-covid-19-outbreak-technical-guidance-europe-OLD/strengthening-and-adjusting-public-health-measures-throughout-the-covid-19-transition-phases.-policy-considerations-for-the-who-european-region.-24-april-2020>

<sup>5</sup> Right to Protection, *Survey on Medical Assistance at EECPs*, April 2020, <https://www.humanitarianresponse.info/en/operations/ukraine/document/r2p-survey-medical-assistance-eeep-april-2020-%D0%BF%D1%80%D0%B0%D0%B2%D0%BE-%D0%BD%D0%B0-%D0%B7%D0%B0%D1%85%D0%B8%D1%81%D1%82>



- Prepare a well-ventilated and equipped waiting room for suspected cases with fever and/or respiratory diseases and establish a referral system for sample collection;
- Since many people enter GCA for the day, i.e., they come and return home in one day, special protocols, rather than the “14 days of self-isolation and observation”, may be applicable to them. This protocol should include recommending that the person seeks medical attention upon returning home.

**Risk: Large numbers of people in COVID-19 risk groups crowd the EECPs**

Because of the hardship they have experienced due to the closure of EECPs, many people may rush to the EECPs immediately after they re-open. This may create large crowds, especially in the initial weeks when the EECPs are implementing new procedures related to COVID-19 prevention

**Mitigation measures:**

In order to limit the number of persons arriving at the EECPs, particularly during the initial weeks, the Government may consider different strategies of segmentation of the population (i.e., dividing arriving persons into groups). Segmentation should take into consideration COVID-19 risk factors.

To prevent situations where persons would be able to leave NGCA, but not enter GCA (or vice versa), it would be necessary to agree on these segmentation measures within the negotiations at Minsk. That is, both sides would need to agree on which groups of people would be allowed to cross during particular time periods.

The segmentation measures should be neutral and evidence-based. It will be important to communicate them clearly and simply to avoid situations where people come to the EECPs, but cannot cross. If the number of new infections remains below the established benchmark, the restrictions should be lifted further after a period of two-to-three weeks.

Even while segmentation measures are in force, it will be important to allow for exceptional crossings on humanitarian grounds, such as in cases involving medical necessity, family reunification or the death of a close family member.

Possible approaches to segmentation would include:

- Segmentation based on mode of transportation. Those traveling in private vehicles can practice physical distancing more easily than those who walk or use public transportation. For that reason, private vehicles could be allowed at earlier stages, while public transportation at a next stage while limiting numbers of passengers.
- Age segmentation. Since older persons face higher risks of serious complications related to COVID-19, the EECPs could lift restrictions on younger persons first, such as: children aged 14-16 who need to receive passport (accompanied by a parent or another responsible adult); school graduates who need to access enrollment procedures; working-aged adults who must cross the EECP for purposes of employment. However, since older persons depend on their pensions to buy food and medicine, the restrictions on their movements must not be unnecessarily delayed.
- Random measures of segmentation. Given the high proportion of older persons crossing the EECPs on a regular basis, it may be necessary to resort to random measures of segmentation, such as those based on odd/even vehicle numbers, year of birth, month of birth, alphabetical order of the last name, etc.

**Risk: Service-providers cannot cope with the large numbers of persons crossing the EECPs to resolve a backlog of issues; this leads to queues and crowding, which increases risk of transmission of COVID-19.**

People will want to approach banks to withdraw money and complete other financial



transactions. Pensioners will want to go to Oshchadbank and social protection departments to verify their presence in GCA. Other government entities, such as administrative service centers (TsNAP), the State Migration Service, courts, Free Legal Aid Centers and pension funds, will also receive a sharp increase in requests for services. This may increase tensions in localities closer to the line of contact since local residents may be crowded out of the available services.

#### Mitigation measures:

This risk can be mitigated both by increasing the availability of services and by extending the time period in which people can access them.

First, to increase the availability of services, the Government may locate them close to the line of contact, e.g., banking, food markets, pharmacies, administrative services. This would reduce the necessity for persons to go—often by public transportation—to towns (especially district centers) near the EECPs, thus decreasing the risk of transmission in these communities. To increase the quantity of services, the Government could consider a surge in personnel, such as by organizing duty trips of relevant staff (social protection departments, state migration service, pension fund departments, medical staff, bank operators etc.). This solution could also include temporary relocation of necessary equipment. If more personnel are available, working hours and days could be extended, allowing visits to be spaced out over time.

Second, it is a priority to extend the transition period after the quarantine. Currently, the transition period (post-quarantine) is thirty days. That means people have only thirty days from the end of quarantine to come to GCA to complete various administrative tasks, such as verifying their identity for pensions and renewing expired documents. This is too short; the resulting queues may be enormous. The transition period should be extended, possibly to ninety days or even to two days for each day of quarantine. The transition period should start from the date when all persons can in fact freely cross both sides of the contact line, so that all persons have equal opportunities to use this period. Note that the current thirty-day transition period was adopted at a time when the quarantine was announced for three weeks (from 12 March to 3 April 2020).

### 3. Mitigating the social and economic impact

As the quarantine measures are lifted, residents of NGCA are likely to face multiple challenges in exercising their rights: they will have missed certain deadlines, their documents will have expired, sufficient services may not be available, and the EECPs may be overloaded. This section describes measures the Government could take to mitigate the negative social and economic impact of the quarantine on persons residing in NGCA.

#### Pensions and related inheritance rights

Until imposition of the quarantine, an estimated 300,000-400,000 pensioners who were registered as IDPs, but resided more permanently in NGCA, had to come to GCA at least once in sixty days to maintain access to their pensions; they were required to undergo regular identification procedures with both Oshchadbank and the social protection departments. When the EECPs re-open, these pensioners are likely to face delays in being able to cross the EECPs and approach Oshchadbank, as well as social protection and pension fund departments. It is important that these delays do not lead to suspension of their pensions. To prevent this, the Government can take several steps:

- De-link access to pensions from IDP registration. For the residents of the NGCA, a special mechanism can be established for paying out pensions through Ukrainian banks in government-controlled territory. This would also eliminate the discriminatory practice of verifications and home visits conducted only for IDPs and not for any other



citizens. It will also reduce pressure on (and queues at) social protection departments charged with home visits and verifications.<sup>6</sup>

- Simplify procedures associated with verifying access to pensions. For example, instead of having both physical identification in the Oshchadbank and verifications based on the information on crossing of the line of contact, it could be enough to have physical identification only. Instead of requiring pensioners from NGCA to undergo a two-step verification procedure, visiting both the Oshchadbank and the office of the social protection, the procedure could be simplified to one step, such as requiring physical identification only at Oshchadbank.
- Implement operational measures to ensure that pensions can be collected safely, for example:
  - Extend the transition period after the quarantine to ninety days or even longer (see above).
  - Request the Oshchadbank to issue pensioners with appointments by text message (SMS) to specify a window of dates during which they should come for identification and pension collection; people would not be allowed to undergo identification at a date earlier than this window, but would be allowed to come later.
  - Review conditions where pensioners will undergo physical identification at the Oshchadbank branches along the contact line, so that staff and visitors can observe physical distancing, hand hygiene and respiratory etiquette. The bank's identification capacity needs to be aligned with the number of pensioners crossing. At the same time, the needs of local communities remain important. Thus, either pensioners from NGCA need to be equally spread along certain timeline, or the number of staff working in the Oshchadbank's divisions near the contact line could be increased.
  - Ensure that bank branches along the contact line have sufficient cash to meet an expected surge in demand.
- The deadline for obtaining non-received pension of a deceased family member needs to be extended. According the Law of Ukraine "On compulsory state pension insurance," the deadline is currently 180 days. It is recommended to extend the deadline to a period of one year, since there may be delays in the registration of deaths and other procedural matters.

### Birth and death registration

According to the Ministry of Justice, in each month of the first half of 2019, Ukrainian courts registered an average of 598 births and 1815 deaths that occurred in the NGCA. With EECPs closed, a significant backlog of cases is forming. The courts along the contact line are likely to be overloaded after the quarantine ends. As a result, families will not be able to obtain Ukrainian birth certificates for their newborn babies nor register the deaths of their loved ones. They may have to travel to GCA multiple times to register these legal facts, and this will contribute to overloading of the EECPs and greater public health risks. With courts along the contact line overloaded, local residents of communities along the contact line will not have access to justice. These problems could be avoided if the Government introduced an administrative procedure, at least for birth registration. In preparation for the end of quarantine, the Government could make plans to pilot, test and fine-tune the administrative procedure for birth registration.

### Identity documents

There is also a backlog of persons who have not been able to obtain/renew identity documents. The State Migration Service may be able to estimate the size of this backlog. It would include persons in several situations, such as:

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<sup>6</sup> A draft "special mechanism" already exists and could be quickly reviewed with the goal of establishing a simple and non-discriminatory procedure with the minimum burden on Ukraine's civil servants.



- Children who turned 14 and need to receive a Ukrainian national ID card for the first time;
- People who lost or damaged their passport or ID card, as well as people whose identity documents have expired;
- People who turned 25 or 45 during the quarantine period and need to insert a new photo in their book-shaped passport.

When quarantine measures were introduced, the State Migration Service announced that in case of the late application for an ID card, no fines will be applicable during the period of the quarantine and for 30 days thereafter.

Taking into account the possible backlog, it is recommended that:

- Extend the transition period after the quarantine for these services to ninety days or even longer (see above).
- During this extended transition period, no fines should be applied in cases of late application for an ID card for the first time and or late change of a picture in the book-shaped passport;
- Coordination is ensured with the State Border Guard Service so that people with expired and damaged passports are allowed to cross to access documentation services.

#### Freedom of movement across the EECPs

Resolution of the Cabinet of Ministers of Ukraine # 815 regulates crossing of the line of contact. It provides that as of 1 May, children aged 14-16 must have an ID card or passport for travelling abroad in order to cross the EECp; they will not be allowed to cross on the basis of their birth certificates. No exceptions have been foreseen. However, since 22 March, children from NGCA have had no opportunity to apply for an ID card or a passport for travelling abroad. It is recommended to postpone introduction of this rule until after the transition period following the quarantine, which should be for at least ninety days or even longer (see above).

According to the Order #92 of the Ministry of Veterans, TOT and IDPs<sup>7</sup> containing the list of items prohibited for transfer, there is a limit on the amount of cash a person may take across the EECPs. The Order sets out that an individual can take up to 20 000 UAH to the NGCA without supporting documents. However, there is no separate procedure to take through larger amounts of cash “with supporting documents” (no list of such documents or other types of evidence that could be considered). Some people are likely to want to take back larger amounts: they have accumulated funds in their Ukrainian bank accounts, and they may have debts to pay. It is recommended to amend the Order to allow for larger amounts to be taken to NGCA with supporting documents.

#### Access to education

Based on data from the 2018-2019 school year, 890 children from NGCA were enrolled in distance/external learning in Luhanska GCA and 3,400 in Donetska GCA. Additionally, 1600 children used a “simplified procedure” as per the Order of the Ministry of Education and Science of Ukraine № 697 from 21.06.2016 to enter higher education in GCA. Similarly, in 2020, many school graduates from NGCA have plans to undergo external evaluation or to use “simplified procedure” in order to enroll in vocational or higher education institutions in GCA and to receive widely recognized education certificates. To allow these children to access existing procedures, the timelines of both final exams and admission campaign need to be adjusted depending on the time and modalities of EECps’ opening. Possible simplification and more extensive use of online technologies shall be considered in order to ensure that no physical crossing is required or at least only a single trip is needed to be enrolled.

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<sup>7</sup> This is the predecessor of the current Ministry of Reintegration of the Temporarily Occupied Territories.



#### 4. Communicating about the transition

WHO guidance emphasizes that “the transition phase can only be properly managed if the public is effectively engaged and ready to support the measures being implemented.”<sup>8</sup> Public adherence to suggested measures will be more effective if communication with the target audience is transparent, widespread, and available through multiple channels, including informal ones. Public communication should explain:

- Phases of the progressive easing;
- Measures to be adhered to before, during and after crossing in order to minimize the risk of transmission;
- Indicators which will trigger further easing or on the contrary, return to limitations,
- Any information that may influence an individual’s decision about whether to cross the contact line, e.g., the recommended times for crossing.

Communication needs to be clear and simple. When communication is timely, effective, evidence-based and honest, this contributes to building public trust. Good communication does not raise false expectations. People should be clearly informed that restrictions may be renewed in case the threshold of the number of infected individuals grows in a certain geographic area.

When designing and using digital solutions for communication, it is necessary to keep in mind that older persons may have difficulties in accessing and using it. They may not have devices, internet access or digital literacy. It is also important that any digital solutions are also in line with human rights regulations related to privacy and data protection.

An important aspect of communication is a feedback mechanism, such as a hotline, so that people can pose questions, clarify measures and provide information on their experiences after the movement across the line of contact is gradually renewed.

Communication is key to successful implementation of these complex measures that will carefully balance people’s social and economic needs with public health considerations.

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<sup>8</sup> World Health Organization, *Strengthening and adjusting public health measures throughout the COVID-19 transition phases*. Policy considerations for the WHO European Region, 24 April 2020.



**ANNEX: Checklist of risk mitigation measures related to the safe re-opening of the EECPs**

Risk	Mitigation measures
<p>A. Transmission of COVID-19 among EECP personnel, persons crossing the EECPs or in nearby communities</p>	<ol style="list-style-type: none"> <li>1. Ensure that all staff working at EECPs, as well as service providers (such as medical staff, providers of transportation services and maintenance personnel), have personal protective items, undergo thermal monitoring regularly, adhere to respiratory etiquette and practice regular handwashing and sanitizing.</li> <li>2. Reorganize the flow of persons through the EECPs to allow for physical distancing; this may require enlarging resting and waiting areas.</li> <li>3. Increase the number of personnel of the State Border Guard Service (SBGS) at the EECPs, i.e. that all least all booths installed at EECPs are fully functional during all working hours, plus consider installation and staffing of additional booths (at least one per each EECP).</li> <li>4. Expand hygiene facilities so that there are multiple places for travelers and personnel to wash and sanitize their hands.</li> <li>5. Place information boards with recommendations on handwashing and sanitizing, as well as on respiratory etiquette, in places accessible to those crossing.</li> <li>6. Conduct thermal screening at crossing; special medical protocols shall be in place in case a person with the fever is identified.</li> <li>7. Place medical personnel at EECPs with clear protocols regarding their roles in identifying, isolating, testing and treating all cases and to trace and quarantine contacts.</li> <li>8. Prepare a well-ventilated and equipped waiting room for suspected cases with fever and/or respiratory diseases and establish a referral system for sample collection.</li> <li>9. Since many people enter GCA for the day, i.e., they come and return home in one day, special protocols, rather than the “14 days of self-isolation and observation”, may be applicable to them. This protocol should include recommending that the person seeks medical attention upon returning home.</li> <li>10. Install and maintain shelters, tents, cooling points and other protective installations to ensure that people can maintain physical distancing and are not stuck under the direct sunlight.</li> <li>11. Provide drinking water and disposable cups at all EECPs both at the SBGS checkpoint (e.g., at SES tents and other tents which would be established) and ‘grey zone’ (as an example, in URCS point at EECP Stanytsia Luhanska), depending on daily crossing average.</li> <li>12. Ensure the presence of at least one ambulance and respective medical personnel at the EECPs during its operational hours on a daily basis. If not possible the ambulance to be present at the EECP all the time, ensure that there is at least one ambulance in the nearby location which would reach the EECP immediately after a call.</li> <li>13. Introduce measures to ensure a compulsory physical distancing between individuals crossing an EECP, e.g. by putting distancing markers (sprayed or painted).</li> <li>14. Enforce the use of face-masks by all people crossing EECPs, particularly through providing masks for NGCA residents crossing towards GCA (who may not have a mask because of existing difficulties to purchase it in NGCA).</li> <li>15. Regularly disinfect the area with the shelters, tents, cooling points,</li> </ol>



	<p>SBGS windows on a regular basis. Also, disinfect areas where people congregate to receive services, such as around bank machines (ATMs).</p>
<p>B. Large numbers of people in COVID-19 risk groups crowd the EECPs</p>	<ol style="list-style-type: none"> <li>1. Define the preliminary date of the EECPs' gradual re-opening and public health indicators that may lead to temporarily reversing decisions on opening, e.g. based on the number of cases identified at EECPs over two weeks or 20 per cent increase of cases in communities adjacent to EECPs.</li> <li>2. Provide an advance (at least two weeks') notice to people about the opening of the EECPs, as well as awareness raising about each step of progressive easing on opening EECPs and situations in which decisions may be temporarily reversed .</li> <li>3. Agree on measures for segmentation of the population in the Minsk format.</li> <li>4. Elaborate the grounds for segmentation, such as on type of transportation, age or random measures.</li> <li>5. Ensure that regardless of quarantine or segmentation measures, persons with compelling needs are allowed to cross the EECPs exceptionally on humanitarian grounds (such as family unity, death of a close family member, serious health conditions requiring medical treatment with all the precautionary measures related to COVID-19 observed).</li> <li>6. Consider the possibility of introducing electronic registration prior to arrival to EECP and to disseminate text messages (SMS) to people who were registered in electronic queues informing on any changes in the functioning of EECPs.</li> </ol>
<p>C. Service-providers cannot cope with the large numbers of persons crossing the EECPs to resolve a backlog of issues; this leads to queues and crowding, which increases risk of transmission of COVID-19.</p>	<ol style="list-style-type: none"> <li>1. Make services available closer to the contact line. This can include banking, food markets, pharmacies and administrative services.</li> <li>2. Deploy additional personnel (SBGS, social protection departments, pension funds, State Migration Service, medical staff) to areas close to the EECPs.</li> <li>3. Increase hours of EECPs' operations (temporarily) – from 06.00 or 07.00 to 20.30 for the first month of the opening of EECPs.</li> <li>4. Increase a number of free busses from EECPs to the 'zero checkpoint'.</li> <li>5. Increase the transportation services at the EECPs (for those travelling to other locations within the region). Regional authorities to regulate the prices for transportation not to allow unsubstantiated increase in ticket costs. Ensure that busses are available during the EECP operational hours.</li> <li>6. Increase a number of mobile Oshchadbank divisions, personnel and ATMs at EECPs. Ensure the availability of sufficient cash in the ATMs.</li> <li>7. Extend the working hours/days of service-providers (such as administrative offices and Oshchadbank) during the first months after the EECP is opened: from 07.30 until 19.00 Monday – Friday and until 13.00 on Saturday.</li> <li>8. Extend the transition period after the quarantine, possibly to ninety days or even to two days for each day of quarantine. The transition should start from the date when all persons can in fact freely cross both sides of the contact line.</li> </ol>
<p>D. Pensioners from NGCA, as well as IDP pensioners, face risk of</p>	<ol style="list-style-type: none"> <li>1. De-link access to pensions from IDP registration. For the residents of the NGCA, a special mechanism can be established for paying out pensions through Ukrainian banks in government-controlled territory.</li> </ol>



<p>suspension of their payments</p>	<ol style="list-style-type: none"> <li>2. Simplify procedures associated with verifying access to pensions. Instead of having both physical identification in the Oshchadbank and verifications based on the information on crossing of the line of contact, it could be enough to have physical identification only. Instead of requiring pensioners from NGCA to undergo a two-step verification procedure, visiting both the Oshchadbank and the office of the social protection, the procedure could be simplified to one step, such as requiring physical identification only at Oshchadbank.</li> <li>3. Extend the transition period after the quarantine to ninety days or even longer (see above).</li> <li>4. Request Oshchadbank to issue pensioners with appointments by text message (SMS) to specify a window of dates during which they should come for identification and pension collection; people would not be allowed to undergo identification at a date earlier than this window, but would be allowed to come later.</li> <li>5. Review conditions where pensioners will undergo physical identification at the Oshchadbank branches along the contact line, so that staff and visitors can observe physical distancing, hand hygiene and respiratory etiquette. The bank's identification capacity needs to be aligned with the number of pensioners crossing.</li> <li>6. Ensure that bank branches along the contact line have sufficient cash to meet an expected surge in demand.</li> <li>7. The deadline for obtaining non-received pension of a deceased family member needs to be extended. According the Law of Ukraine "On compulsory state pension insurance," the deadline is currently 180 days. It is recommended to extend the deadline to a period of one year, since there may be delays in the registration of deaths and other procedural matters.</li> <li>8. The first announcement regarding the limitations at EECs has been published by the JFO on 06 March 2020. Given this fact, some people could decide to NOT cross the "contact line" for safety reasons, or for the fear that the crossing will not be possible. Currently, all cards for social/pension payments which should terminate during the period of quarantine are automatically prolonged, but this measure does not effect on the 'transitional phase' between the first limitations on crossing the EECs and the adoption of the quarantine. The proposal is to expand this measure also for cardholders (pensions/social payments) whose cards were terminated in the mentioned timeframes as well.</li> </ol>
<p>E. Increased number of undocumented cases of birth and death which occurred in NGCA, and consequently overwhelmed court system</p>	<ol style="list-style-type: none"> <li>1. Introduce effective, accessible (close to EECs) administrative procedure for birth registration. This could be done on a pilot basis before scaling up.</li> <li>2. At minimum, ensure that courts accept applications for birth registration without prior visit to the registration office (which usually issues a rejection that serves as a ground for judicial procedure).</li> <li>3. Consider submission of documents to the court by digital means.</li> </ol>
<p>F. Persons face long waits to obtain/renew identity documents.</p>	<ol style="list-style-type: none"> <li>1. Increase the number of staff in SMS offices near the line of contact to provide timely services.</li> <li>2. Extend the transition period after the quarantine for services related to issuance of identity documents; transition period should be at least ninety days or even longer (see above).</li> </ol>



	<ol style="list-style-type: none"> <li>3. During the transition period, no fines should be applied in case of late application.</li> <li>4. Coordinate with SBGS to ensure that persons with expired or damaged identity documents are allowed to cross to access documentation services.</li> <li>5. Establish (at least on temporary basis) the functioning of a Center for Provision of Administrative Services (TsNAP) at the EECP, so that at least documents for IDs or passports for travelling abroad could be submitted there.</li> <li>6. Elaborate procedures that will allow people who reached 25 and 45 and need to change photo in their book-shaped passport are not fined for not doing it in time and their applications are accepted.</li> <li>7. Simplify “identification” procedure in case a passport document has been lost or damaged (e.g. consider a possibility for witnesses to provide information through electronic means of communication).</li> </ol>
<p>G. Certain persons face undue restrictions in crossing the EECPs.</p>	<ol style="list-style-type: none"> <li>1. Amend Resolution 815 in order to ensure that children 14-16 can cross from NGCA with the birth certificate for a transitional period of at least ninety days (or longer).</li> <li>2. Introduce amendments to Order #92 of MVTOT, at least on a temporary basis of ninety days, so that individuals can transfer larger amounts of cash provided they have sufficient supporting documentation.</li> </ol>
<p>H. Recent graduates from NGCA lack access to education</p>	<ol style="list-style-type: none"> <li>1. Introduce clear procedure and timeline for admission campaign for graduates from NGCA including possibility of additional exams slots, if required.</li> <li>2. Disseminate information about how residents of NGCA can access public Ukrainian education through all relevant MoE resources.</li> <li>3. Utilize online technologies to minimize number of times persons must cross the EECP to access education.</li> </ol>
<p>I. People do not understand the restrictions imposed at the EECPs</p>	<ol style="list-style-type: none"> <li>1. Devise clear and simple public messages that explain: <ul style="list-style-type: none"> <li>-Phases of the progressive easing;</li> <li>-Measures to be adhered to before, during and after crossing in order to minimize the risk of transmission;</li> <li>-Indicators which will trigger further easing or on the contrary, return to limitations,</li> <li>-Any information that may influence an individual's decision about whether to cross the contact line, e.g., the recommended times for crossing.</li> </ul> </li> <li>2. Establish a feedback mechanism, such as a hotline, so that people can pose questions, clarify measures and provide feedback on their experiences at the EECPs.</li> <li>3. Increase awareness of populations on both sides on the “contact line” using: <ul style="list-style-type: none"> <li>-short radio messages (as social advertisement);</li> <li>-TV messages (as social advertisement)</li> <li>-hotlines;</li> <li>-messages <i>via</i> official YouTube channels, social media (as social advertisement);</li> <li>-infographics at the EECPs;</li> <li>-announcements <i>via</i> loudspeakers at the EECPs;</li> <li>-publications in social media (official page of the Ministry, telegram channels), etc.</li> </ul> </li> </ol>