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COVID-19: CHANGES AND PROCEDURES BANKS SHOULD CONSIDER WHEN PLANNING TO REOPEN

As states across the country discuss reopening businesses to the public, it is important to maintain physical distancing and make necessary changes to protect your employees and customers. Most banks are beginning this process by scheduling the reversal of the steps they took in implementing disaster recovery plans. Below is a list of ideas, changes, and procedures your bank should consider implementing to ensure we continue to flatten the curve as businesses reopen.

EMPLOYEE PROTECTIVE PROCEDURES

- Implement procedures for employees to maintain physical distancing from each other e.g., only two people in the break room at any one time; no group meetings; reduce or eliminate in-person meetings; etc..
- Have tellers use hand sanitizer before taking anything from a customer or handing anything to a customer.
- Have tellers frequently wash their hands with soap and water for the length of time recommended by the CDC. Remember, hand sanitizer is not an adequate replacement for hand washing with soap and water.
- Have employees frequently clean all customer areas, including seating areas, front doors, teller windows, counters, and ATMs, at least three times per day (if possible, every 2 hours). Provide protective equipment and procedure training for cleanings.
- Implement online meetings, video chats, etc. between branches and with customers. For example, if a customer wants to meet with a financial planner, offer video meetings.
- Post a sign on the front door stating that individuals with a fever, other COVID-19 symptoms, or who have travelled to certain areas, should not enter the bank.
- Limit the number of individuals inside the bank to 50% of fire capacity occupancy or 8 customers per 1,000 square feet, including employees. Have an employee stand by the door to ask customers to wait outside, at least six feet apart, when the capacity limit has been reached.
- Do not allow employees with a fever or any COVID-19 related symptoms to work. Consider periodic temperature checks and how they will be performed. Consider having employees complete periodic health and exposure questionnaires. Employers should maintain the confidentiality of employee health information.
- Provide masks and gloves for all employees and strongly encourage or require that they be worn at all times while on the premises.
- Add workspace dividers.
- Try to limit cash transactions. For cash deposits/withdrawals, where possible, recommend using the ATM or remote deposit capture devices.
- Restrict business travel.
- Divide department personnel and executive officers into separate locations for daily work.
- Establish alternate day/split shift work schedules.
- Establish work-at-home protocols for those whose job function would not be impaired.
- Alternate meal and other employee breaks to reduce congregation.
- Make all customer meetings by appointment only.

CUSTOMER PROTECTIVE PROCEDURES

- Provide (and require use of) hand sanitizer, masks, and gloves, at all points of entry, in all waiting areas, and at teller counters. Place a large sign encouraging all customers to use hand sanitizer as they enter and leave the premises. Provide extra waste baskets at all entry points and waiting areas to prevent litter.
- Consider temperature checks. Decide who conducts and what thermometers to use.
- Rearrange lobbies and waiting areas to provide more distance between customers (at least six feet). Move furniture, plants, and other obstacles to provide a more open floor plan.



- Encourage customers to use drive-thru, online banking, automated banking, ATMs, etc. (Consider increasing ATM cash withdrawal limits), and provide additional training for using these banking methods.
- Place stickers or markings of some sort on the floor at least 6 feet apart to indicate where customers should stand while waiting in line.
- Have an employee stand by the front door to ask customers how they can help them to have customers spend as little time inside the branch as possible. Customers may also appreciate the initiative and having to spend less time waiting in line.
- Consider providing pens with the company name on them as a marketing giveaway so that customers do not share pens.
- Consider health and exposure questionnaires be completed by customers before any in-person meetings. Who reviews? How to determine if disallow entry?
- Encourage phone calls by adequately manning phone lines.
- Redesign employee performance review process.
- Communicate with customers on the procedures being implemented.
- Conduct shareholder meetings, executive meetings, etc. using video or voice conference.
- To address the risk of persons entering the premises wearing a mask and being unsure whether it is for protection or potential crime, consider requesting that customers use the masks provided by the branch and do not enter wearing custom masks or asking customers to show their face to a security camera. (The FDIC has stated with respect to customers entering the bank with a mask that staff should be trained to take appropriate measures to maintain security for themselves and their customers. Local law enforcement should be contacted when staff are concerned about individuals on bank premises.)
- Develop procedures to address how the branch will handle an employee who shows symptoms of COVID-19 or tests positive for COVID-19, including two-week self-isolation, cleaning protocols, and exposure tracing to determine if other employees need to self-isolate as well.
- Record and report any confirmed COVID-19 case pursuant to OSHA standards.
- Limit elevator capacity.
- Limit visits by outside vendors.
- Review and consider revising protocols for all deliveries.

BUSINESS FUNCTIONALITY CHANGES

- Review the CDC cleaning guide and make sure the entire branch is adequately cleaned in accordance with those guidelines before allowing employees and customers to return.
- Install automatic doors at all customer entry points so that customers do not have to touch handles.
- Replace doorknobs and handles with forearm bars or automatic sensors.
- Add plexiglass or some form of barrier between customers and tellers.
- Install Interactive Teller Machines so customers can video chat with a teller from outside the building.
- Inspect and review your HVAC system to determine if changes need to be made to improve air quality and reduce airborne contaminants, such as increased circulation, filtration, and ventilation.

FOR BANKS WITH ANY ADDITIONAL QUESTIONS ON PREPARING TO REOPEN, PLEASE CONTACT:



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