

Safety Guidelines and Considerations for Reopening Branches

Pre-Opening Questionnaire:

YES NO

Will you open all, or only a limited number of your branches at once?

Will you conduct non-teller related business in a different location?

Will you continue to let customers into the lobby by appointment only?

Will you otherwise limit the number of people allowed in the branch?

Do you have sufficient PPE (personal protective equipment) such as masks, gloves, and sanitizing products to keep customers and employees safe?

Is your bank set up to keep the appropriate recommended distance of 6ft/2m between people?

If no, how will you change the layout to make sure people can stay safely distant?

How will you mark the spaces in your bank to encourage this separation (signs, floor markings, rope, etc.)?

Will you provide barriers, such a plexiglass screen, to shield your employees?

Are your branches and employees ready and properly equipped to go back to normal operations?

Do you have sufficient protocols and documentation to demonstrate to officials that you're keeping to safety standards?

The act of reopening has been largely left up to states and localities, so please check with your local government for more applicable guidance.

CDC

[cdc.gov/coronavirus/2019-nCoV/index.html](https://www.cdc.gov/coronavirus/2019-nCoV/index.html)

EEOC

[eeoc.gov/eeoc/newsroom/wysk/wysk_ada_rehabilitaion_act_coronavirus.cfm](https://www.eeoc.gov/eeoc/newsroom/wysk/wysk_ada_rehabilitaion_act_coronavirus.cfm)

FDIC

[fdic.gov/coronavirus/index.html](https://www.fdic.gov/coronavirus/index.html)

Federal Reserve Bank of Kansas City

[kansascityfed.org/newsroom/covid-19-resources](https://www.kansascityfed.org/newsroom/covid-19-resources)

Federal Reserve Bank of St. Louis

[stlouisfed.org/covid-19](https://www.stlouisfed.org/covid-19)

FEMA

[fema.gov/coronavirus](https://www.fema.gov/coronavirus)

OCC

[occ.gov/topics/supervision-and-examination/bank-operations/covid-19-information/convid-19-info-index.html](https://www.occ.gov/topics/supervision-and-examination/bank-operations/covid-19-information/convid-19-info-index.html)

Public Guidance from the World Health Organization (WHO)

- » Hands should be regularly and thoroughly washed with soap and water (soap breaks down the outer fatty layer of the virus and causes it to degrade).
- » Maintaining a distance of 6ft/2m is effective because the respiratory droplets from a sneeze or cough only travel a limited distance.
- » Additionally, now is a good time to remind everyone to sneeze and cough into the crook of their elbow.

Customers Wearing Masks

Identifying Customers

While not always required, individuals may insist on wearing masks to protect themselves and the people around them for the foreseeable future.

- » Since “Know Your Customer” rules must still be followed, develop a policy to visually identify mask-wearing customers while still adhering to social distancing safety standards.
- » Consider potential reputation risk before asking customers to remove their masks.
- » Some banks are considering marking a point six feet from the teller, asking customers to remove their masks there, and then replace them before moving closer.

Preventing Robberies

Identifying potential threats is going to be a matter of adjusting internal processes, and properly training lobby employees.

Using markings or ropes to mark spacing for social distancing can double as an offset to potential threats. Security cameras may need to be re-trained to capture customer images based on any new identification processes.

- » Lobby employees should be trained to identify, interrupt, and de-escalate any potential threats.
- » In particular, be cautious of customers wearing more face covering than just a mask.
- » Law enforcement suggests that if a threat chooses to go through with a robbery, existing procedures should be followed.

Employee Safety

For tips on employee safety, you can refer to information provided by your State Bankers Association, FAQs published by the ABA, or the tools available on the Compliance Alliance COVID-19 pages (<https://compliancealliance.com/about-us/pandemic-planning-for-banks>).

For tips on cleaning workspaces, you can refer to the CDC’s published guidelines (<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>) and/or C/A’s Cleaning Checklist (<https://compliancealliance.com/find-a-tool/tool/covid-19-cleaning-checklist>).

Use guidelines provided by healthcare professionals and your local governments to keep your employees informed and educated on preventing the spread of the virus.

If An Employee Tests Positive ...

This is a good time to check your bank’s policy for a response - if your existing policies don’t cover an event like this, consider expanding it or developing a dedicated policy.

When coming up with a response, consider the following:

- » COVID-19 is a recordable illness when a worker is infected on the job. Refer to OSHA for reporting standards (<https://www.osha.gov/recordkeeping/index.html>).
- » To what extent should coworkers that have been exposed be quarantined? Keep in mind that health professionals generally recommend two weeks, as that is the incubation time for the disease.
- » Has the employee interacted with customers while infected?
- » What are the legal implications if the employee was exposed to the virus at work?

Additional Tools from C/A:

COVID-19 Customer Prescreening Questionnaire
<https://compliancealliance.com/find-a-tool/tool/covid-19-customer-prescreening-questionnaire>

COVID-19 Employee Prescreening Questionnaire
<https://compliancealliance.com/find-a-tool/tool/>

[covid-19-employee-prescreening-questionnaire](#)

Pandemic Policy
<https://compliancealliance.com/find-a-tool/tool/pandemic-policy>

And of course, members are welcome to use our hotline and review service to answer any questions.