



# A Guide for Pandemic Response - Return to the New Normal

May 11, 2020



# A Guide for Pandemic Response - Return to the New Normal

## Introduction:

This guide provides suggestions to help community banks when resuming more normal operations and person-to-person services.<sup>1</sup> Every community bank will have its own circumstances driven by local pandemic conditions, state guidance, business requirements, and the needs of your local communities. Key considerations will include the emotional state of your employees, how to protect personnel, mitigate instances of COVID-19 exposure or outbreak, sanitizing areas, legal liability, and coordination with CDC, Federal, State or local guidelines.

## Personnel and Facilities:

When returning to the office or opening branches, please follow relevant CDC, Federal, State and local guidelines, which includes but is not limited to:

### Emotional State of Employees

It is important when considering returning to more normal operations, like returning to the office or opening branch lobbies, that you take into consideration and address the emotional state of your employees. Some employees may not feel comfortable returning to work, or they may be in a high-risk category (those who have encountered infected persons, traveled in affected areas, are elderly, have underlying health conditions, or feel ill). In these situations, and where possible, consider allowing employees to continue to work from home.

### General Recommendations

- Promote the use of solutions such as online banking, mobile apps, phone banking, appointments by phone, ATMs, and the use of drive-thru windows.
- Post CDC and State health department safety hygiene information at the entrance to buildings.
- Make hand sanitizer available to customers and employees.
- Provide and require employees to wear medical or cloth masks if your community bank's circumstances indicate that it is necessary to do so, or there is a CDC, Federal, State or local guideline to do so.
- Provide and require employees to wear gloves if your community bank's circumstances indicate that it is necessary to do so, or there is a CDC, Federal, State or local guideline to do so.
- Encourage employees to wash their hands often, including before and after going on break, eating, or using the rest room.
- Clean buildings and work areas more frequently following CDC guidelines.

---

<sup>1</sup> The information provided in this guide does not, and is not intended to provide nor constitute legal advice; instead, all information, and content are for general informational purposes only. Community banks are advised to consult with appropriate and knowledgeable counsel about COVID-19 requirements, responses, or actions.

- Clean pens and other commonly used items between use, and/or allow customers to take the pens out of the building with them.
- Contact your HVAC professional to see if there is a way to increase the flow of fresh air into the building. Replace air filters more regularly.

### **Employee to Customer Interactions**

- Limit the number of customers in your lobby or building if your community bank's circumstances indicate that it is necessary to do so, or there is a State or local requirement to do so.
- Create a physical barrier of separation between employees and customers whenever possible.
  - As an example, the use of Plexiglas or other see-through materials can be used at the teller line to provide that barrier.
- Allow customers to wear medical or cloth masks in your buildings if your community bank's circumstances indicate that it is necessary to do so, or there is a CDC, Federal, or State guideline to do so.
  - Request that customers remove their masks long enough to allow for identification, per your bank's customer identification program.
  - If the customer refuses to identify themselves, you have the right to refuse service and request that the customer leave the bank.
- Install social distancing markings on the floor, or other similar techniques, to help create appropriate distances between customers who are in line or in queue.
- Maintain a six-foot distance between employees and customers for non-teller interactions like those between a personal banker or loan officer and a customer.
- Encourage employees not to shake hands with or touch a customer or engage in any other activity that results in a less than six-foot distance between employee and customer.
- Avoid using small offices when meeting with customers, and instead meet in larger rooms.
- Avoid taking papers directly from a customer, since that would result in less than six-foot distance between employee and customer and possibly touching the customer inadvertently. Instead, request that papers be placed on a desk, and then retrieve the papers after the customer has stepped back or sat down.
- Take special care when employees and customers enter safety deposit box areas, since these areas are often small.

### **Employee to Employee Interactions**

- Consider allowing employees who are able and productive, to continue to work from home while the pandemic is still in place.
- Limit non-essential employees and vendors from entering the building.
- Consider pre-screening employees before or shortly after entering the building by measuring their temperature and asking them if they have any COVID-19 symptoms

- or if they have been exposed to an individual who has, or who they suspect having, COVID-19. If the employee does not have a temperature or symptoms, they should self-monitor under the supervision of their employer's occupational health program.
- Consider allowing employees to enter the building at spaced intervals or using different building entrances.
  - For employee to employee interactions, maintain a six-foot distance between the employees. This includes when entering the building or interacting throughout the day.
  - Encourage employees not to shake hands with or touch another employee or engage in any other activity that results in a less than six-foot distance between employees.
  - Use phone calls or other collaboration tools when employees need to talk or meet. In the instances where that is not possible, avoid using small offices when meeting and instead use larger rooms.
  - If papers need to be exchanged between employees, have the one employee place the papers down on a desk or counter, and then retrieve the papers after that employee has stepped back or sat down.
  - Create greater physical separation between employees by separating employees' work areas as much as possible within the building, or by allowing employees in the same department to work from different buildings.
  - Reduce business operations where possible.

### **In the Event of a COVID-19 Exposure or Outbreak**

- Follow appropriate COVID-19 and health procedures, which may include but is not limited to:
  - Coordinate with or notify State and local authorities.
  - Reinforce the importance of social distancing at work and on personal time and the benefits of medical or cloth face masks.
  - Provide clear symptom-reporting guidance to employees for at-home, self-administered wellness checks and/or observations while on-shift, thereby encouraging open, frequent, and rapid communications.<sup>2</sup>
  - Require employees to stay home or self-quarantine for 14 or more days if they have been exposed to someone diagnosed with COVID-19, are experiencing symptoms of COVID-19, or have been diagnosed with COVID-19.<sup>3</sup>
  - Require employees to stay home or self-quarantine for 14 or more days if they have recently traveled.

---

<sup>2</sup> <https://www.cisa.gov/publication/critical-infrastructure-operation-centers-and-control-rooms-guide-pandemic-response>. Also consult your community bank's Human Resource and Health policies and procedures to maintain, among other things, the privacy of the employee's health.

<sup>3</sup> Consult your community bank's Human Resource and Health policies and procedures for the application of Sick Leave, Personal Days, Vacation Days, or FMLA. Per your community bank's policies, the community bank might also require employees, returning to work from quarantine, to provide a clean bill of healthy note from a doctor.

- Establish communications plans for reporting cases and any resulting quarantine, facility shutdowns, and cleaning actions to employees, shareholders, customers, and State and local authorities.

### **Liability:**

There are concerns from community banks about potential liability if an employee or customer contracts COVID-19 and claims they contracted it while at the bank. To mitigate potential liability, banks should always exercise reasonable care to mitigate known hazards like contagious illness. Following CDC, Federal, State and local guidelines, as well as requiring sick employees stay home and maintain social distancing, should mitigate potential liability from such COVID-19 claims.

### **Resources:**

- <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>
- <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>
- <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>
- <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>
- <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>
- <https://www.osha.gov/Publications/OSHA3990.pdf>
- <https://www.nih.gov/health-information/coronavirus>
- <https://www.cisa.gov/coronavirus>
- <https://www.cisa.gov/publication/critical-infrastructure-operation-centers-and-control-rooms-guide-pandemic-response>
- <https://www.fdic.gov/coronavirus>
- <https://occ.gov/topics/supervision-and-examination/bank-operations/covid-19-information/convid-19-info-index.html>

**About:**

The Independent Community Bankers of America® creates and promotes an environment where community banks flourish. With more than 50,000 locations nationwide, community banks constitute 99 percent of all banks, employ nearly 750,000 Americans and are the only physical banking presence in one in three U.S. counties. Holding more than \$5 trillion in assets, more than \$4 trillion in deposits, and more than \$3.4 trillion in loans to consumers, small businesses and the agricultural community, community banks channel local deposits into the Main Streets and neighborhoods they serve, spurring job creation, fostering innovation and fueling their customers' dreams in communities throughout America.

ICBA is dedicated *exclusively* to representing the interests of the community banking industry and its membership through effective advocacy, best-in-class education, and high-quality products and services.

For more information, visit ICBA's website at [www.icba.org](http://www.icba.org).

**Continue the Conversation:**

Joel Williquette  
Senior Vice President, Operational Risk Policy  
Independent Community Bankers of America  
[Joel.Williquette@icba.org](mailto:Joel.Williquette@icba.org)

**Press Inquiries:**

Nicole Swann  
Vice President, Communications  
Independent Community Bankers of America  
[Nicole.Swann@icba.org](mailto:Nicole.Swann@icba.org)  
202-821-4458