CORONAVIRUS
South Dakota Banks
"Back to Normal" Resource
April 30, 2020

SDBANKERS
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As South Dakota and our nation begin to emerge from the COVID-19 pandemic, there are many factors for banks to consider when determining when and how to begin getting "back to normal." So many moving parts will mean this process will look different from county to county and, in some cases, city to city. Use this resource in your discussions about how to best approach this challenge while keeping employees and customers safe.

South Dakota's Back to Normal Plan for Employers

- Encourage good hygiene and sanitation practices, especially in high-traffic areas.
- Encourage employees to stay home when sick.
- If previously operating via telework, begin transitioning employees back to the workplace.
- Where appropriate, screen employees for symptoms prior to entering the workplace.

Important Considerations

- **Government Requirements:** What are the current state, county and city-level requirements? Are there orders in place requiring social distancing, wearing masks or gloves, limiting the number of people in a building, etc.? If you operate across multiple counties, cities or even states, your getting back to normal may differ from branch to branch.
- **Personal Protective Equipment (PPE):** Will the bank supply PPE for employees? If yes, what specific equipment will be provided (masks, gloves, workstation adjustments such as dividers, etc.)? Will the bank require PPE use by employees? Will the bank supply disposable masks for customer use? Are employees and customers allowed to wear masks/face coverings, and if so, how will identification procedures change?
- **Attendance:** Will the bank require employees who have been working from home to continue working from home? Will employees be gradually phased back into in-office work based on their job duties? Will client meetings continue to be available via digital meeting platforms? Will the bank limit the number of occupants in a branch building or lobby?
- **Health Screenings:** Will the bank mandate health screenings/temperature checks for employees returning to work in the office? Will the bank require customers/visitors to submit to wellness checks prior to entering locations? If yes, who will conduct the screenings?

- **Social Distancing:** What are the physical limitations of your locations? Is there room to appropriately distance people, both customers and employees? Will the bank rearrange/alter workstations (desks, teller stations) in order to maintain social distancing between employees or between employees and customers?
- **Office Environment:** Will the bank close or restrict break rooms and other common areas in order to maintain social distancing? Will specific hallways or staircases become "one-way traffic" in order to facilitate social distancing? Will the bank restrict or eliminate shared food and beverages?
- **Business Travel:** Will business travel be allowed?

To what extent will your bank get back to normal?

- Will you get back to normal while adhering to any government-issued requirements, and if so, are your locations and employees equipped to do so?
- Will you open only a limited number of branches?
- Will you alter your locations to limit personal interaction?
- Will you conduct non-teller related business in an alternative location?
- Will you see customers in the lobby or by appointment only?
- Are there any constraints that inhibit you from getting back to normal? If so, identify them to develop solutions and a timeline for getting back to normal, giving both your employees and customers some peace of mind.
- If you already made some of these suggested changes, which changes should remain in place and should any be phased out?

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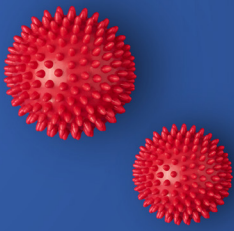
How will your bank ensure the health and safety of your employees?

- Implement basic infection prevention measures, including promoting frequent hand washing and proper respiratory etiquette, providing tissues and hand sanitizer, and discouraging employees from sharing equipment. See guidance from OSHA: www.osha.gov/Publications/OSHA3990.pdf.

- Identify any employees who are at high risk and offer appropriate accommodations (personal protective equipment, separation of workstations, work-from-home options, etc.).

- Consider updating bank policy regarding masks. Are employees allowed to wear them? Are customers? How will identification procedures change? Review robbery procedures with all staff, emphasizing awareness that some customers may enter the bank wearing masks.

- If you are limiting the number of occupants in a branch lobby, post signage notifying customers and the public.

- Review vacation, sick time, and/or leave policies with all employees.

- Discourage handshaking during any in-person meetings.

- Continue to practice social distancing.

- Require employees who become ill to go home immediately.

- Establish facility cleaning/disinfecting guidelines or policy, including increasing the air exchange in your building. See recommendations: EPA at www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2 and CDC at www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html.

- Encourage customers and clients to use online or mobile banking services whenever possible in lieu of coming to the branch.

What if an employee tests positive for COVID-19?

- Your bank should consider developing a written policy if your bank's existing policy does not consider this.

- To what extent should co-workers who may have been exposed be quarantined?

- Has the employee interacted with customers while infected?

- What are the legal implications if the employee was exposed at work? COVID-19 is a recordable illness when a worker is infected on the job. Refer to OSHA standards for reporting: www.osha.gov/SLTC/covid-19/standards.html.

- Consider the implications to operations. Identify employees who can take over those duties while the positive employee is quarantined.

How do banks properly identify customers who are wearing masks and prevent robberies?

- There are legitimate medical reasons for customers to wear a mask. Consider the potential reputational harm in asking customers to remove masks.

- Banks must still comply with "Know Your Customer" rules in this situation. Develop a policy for identifying customers wearing masks based on the layout of your lobby, considering social distancing requirements.

- Banks may consider establishing a point six feet from the teller window at which a customer removes their mask for visual identification and then replaces the mask before moving closer.

- Consider marking the floors using ropes or signage to indicate how you would like the customers to distance while in the lobby. This may depend on whether social distancing requirements or building occupations limits are in place.

- Security cameras may need to be retrained to capture customer images based on your identification process.

Stay in Contact With Your Regulators

Banks should remain in regular contact with their regulators throughout the crisis and recovery, particularly regarding actions taken or questions resulting from the impact of COVID-19. Refer to past exams for specific in-house contact information for your regulators.