



Community Bankers Association of Illinois

One Mission. Community Banks.®

Dear Community Banker,

CBAI has been in daily contact with regulators over the past week coordinating efforts on managing the COVID-19 outbreak. Several members have reached out to us to ask about the legality and efficacy of closing their lobbies during the outbreak. Moments ago we spoke with Chasse Rehwinkel, Acting Director of the Division of Banking at IDFPR. We asked for guidance on lobby closings.

- IDFPR and the Governor's Office strongly encourage banks to remain open to serve customers during the outbreak. They understand that pandemic response plans may call for limiting direct contact by closing lobbies or providing access by appointment only.
- The Division of Banking is working on formal guidance but in the meantime asked CBAI to communicate that closing lobbies at branches with drive up access is perfectly acceptable and does not require a formal proclamation from the Department. They would, however, appreciate notification.
- If a branch does not have drive-up access they strongly encourage the bank to consider keeping the lobby open to serve customers. They understand that this may not always be feasible. If there is no drive up access, the bank must notify the Division of Banking and request a proclamation to close the lobby.
- The Division of Banking's preference is to have minimal closings and disruptions to banking services during the outbreak. They encourage banks to find ways to keep closings to a minimum. You are encouraged to consider closings on a case by case basis and not an overall blanket policy for all branches.

CBAI will keep you posted as formal guidance becomes available.

We will be meeting with state officials later this afternoon to discuss efforts to help mitigate the financial impact of the outbreak on our customers. This may include increased access to funding, outreach to unbanked and underbanked populations, and regulatory relief for banks providing extraordinary services in extraordinary times.

If you have questions or concerns during the outbreak, please don't hesitate to reach out to us. The CBAI governmental relations and legal departments remain hard at work assisting community bankers through this rapidly changing regulatory environment.

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