Financial Sector Return to Normal Operations Resource Guide

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Introduction

In response to immediate risks associated with the coronavirus diseases 2019 (COVID-19), financial services firms moved many worker members to remote work. Now firms continue to evaluate the risks and are developing plans to return workers to offices. There is no one-size-fits-all approach to returning worker members to offices, given the number of variables, which include, but are not limited to, differences in the types of business activities conducted by financial firms, state and local governments, community densities, COVID-19 infection rates (number of cases and deaths), access to healthcare facilities, availability of testing and vaccines, school closures, and public transportation availability. A phased approach may allow firms the ability to return worker to offices based on current levels of transmission as well as state and local government restrictions.

This resource guide provides considerations for U.S. financial services firm's decision makers as they determine how to safely return worker to offices and other facilities. It includes resources for aligning to state and local restrictions and options to consider in making decisions about operational status while protecting the health and safety of workers, customers, and communities. While this resource guide is intended for U.S. financial firms, given the global impact of COVID-19 and the interdependency of supply chains, it may prove useful for firms with global operations. Refer to the Appendix for additional details on questions to consider for returning to the workplace based on local guidance.

Status of COVID-19 and state/local government restrictions

State and local restrictions are a key consideration for identifying a firm's change in its workforce location approach. However, it is not the only consideration. The level of COVID-19 related hospitalizations and deaths in their local communities may assist firms as they make the decision on when and how to return their workforce to the office. The following resources can be utilized to track COVID-19 related hospitalizations and deaths in communities:

- U.S. Coronavirus WorldOMeter
- USAFacts COVID-19 Map by County and State
- Johns Hopkins' Center for Systems Science and Engineering COVID-19 Dashboard
- 1Point3Acres Global COVID-19 Tracker & Interactive Charts

The readiness of the local healthcare system, particularly hospitals, may help inform these decisions. The following resource provides a directory of local health officials:
- NACCHO Directory of Local Health Departments

State and local governments are primarily responsible for maintaining public health and controlling the spread of diseases within state boarders. The following resource can be utilized to track state and local restrictions:
- NCSL State Quarantine and Isolation Statutes

Determining the readiness of your workforce

Firms may implement a phased approach to returning worker to offices based on workforce readiness, business criticality, and job role.

Health and Safety of Workers

The health and safety of workers and customers is paramount and should be central to considerations for returning to the workplace. Firms may need to establish procedures and address concerns such as (1) worker reliance on public transportation, (2) school closures and the availability of childcare, (3) worker identified as high risk, and (4) worker sentiment regarding a return to the office.

>### Public Transportation: Many workers, particularly those in large metropolitan areas, are reliant on public transit for commuting to and from the office. Lack of public transit, or severely reduced public transit schedules, could impact workers returning to the workplace. Some cities are increasing the capabilities for alternative transportation, like walking and biking. The Center for Disease Control and Prevention (CDC) provides considerations for reopening mass transit during the COVID-19 pandemic.[1]

>### School Closures and Availability of Childcare: School closures may limit the ability for certain workers to return to offices. Consider the availability of childcare when asking workers to return to the workplace. The CDC provides considerations for schools[2] and childcare programs[3] during the COVID-19 pandemic.

>### Worker Identified as High Risk: Some worker will be able to return to the workplace in a safer manner than others. Where possible, firms may want to prioritize the return of workers who are not identified as high risk. The CDC provides considerations for people who are at higher risk from COVID-19.[4]

>### Worker Sentiments: Gauging worker sentiments for returning to the workplace may be helpful in determining the correct approach for a firm. Understanding how workers feel about returning to the workplace, such as using surveys, conversations with managers, or other methods, may help encourage a smoother transition.

Business Criticality and Job Role

An evaluation of business units' and/or workers' ability to work remotely can inform the firm's approach to limiting or staggering the number of workers returning to offices. Consider which worker can remain working remotely through the initial phases of returning to normal operations to allow for separation. While some roles can be done remotely, on-premises worker are critical and return to normal operations plans should support their protection. Part of the evaluation may include understanding the risk of exposing essential onsite worker in return to office scenarios and identifying measures to effectively protect this subset of the workforce. The evaluation may also include a process for defining which worker are required to return versus where it may be voluntary.

As businesses return to normal operations, demand for additional on-premises worker may increase. For example, it may be necessary for some business functions, such as branch banking or operations, to be

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[1] https://www.cdc.gov/coronavirus/2019-ncov/community/pdf/MassTransit-DecisionTree.pdf
[2] https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/Schools-Decision-Tree.pdf
[3] https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/Childcare-Decision-Tree.pdf
[4] https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html

performed in offices. Splitting departments to limit the number of workers in the office, will help reduce the potential spread in the building.

The determination to increase worker in a location may be based on the criticality of the role in providing financial services likely to experience significant use and are best served by onsite personnel. Some areas for consideration are:

Online and Mobile Banking and Credit Card Transaction Traffic Increase: The COVID-19 pandemic has accelerated the growth of digital payment platforms and the use of online and mobile banking. Even with the reopening of branches, consumers may continue to depend on digital transactions.

In-person Client Engagement: Some financial services activities require in-person interactions between firm worker and their clients.

Demand for Cash: Some industries, most notably bars and restaurants, are heavily cash-based and the sector may see spikes in cash demand as these industries begin to receive customers again. Additionally, many ATMs are currently in locations that have been closed due to current stay-at-home orders, which has significantly reduced the withdrawal of cash in these areas.

Determining workplace readiness

The readiness of the workplace will be a factor in additional workers working in the office. Physical workplace changes are designed to remediate risks associated with health considerations.

Physical Considerations

Physical changes vary by the type of office or facility, physical footprint, volume of workers and customers, and other factors. These changes may include implementing social distancing within offices by reconfiguring office spaces, limiting seating, installing physical barriers, or closing common spaces. Consider whether in-person meetings and communications are necessary or if work can be accomplished in another manner. Firms may also limit the number of individuals in a space at one time by staggering shifts or limiting the number customers within a facility. The Occupational Safety and Health Administration (OSHA) has developed high-level guidance for how employers may think about preparing a safe workspace.[5]

Consider how often and when offices and other workplaces need to be cleaned. The CDC provides guidance for cleaning and disinfecting public spaces.[6] Notifying workers and customers of the status of cleaning and disinfecting protocols may help increase individuals comfort in the building. Firms may also consider specific procedures for the workplace if an worker or visitor is diagnosed with COVID-19 or may have been in close contact with others diagnosed with COVID-19.[7]

Consider what technological support will be needed as worker begin to return to offices. Firms may need to update the IT environment, including inventories of equipment and account permissions, or

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[5] https://www.osha.gov/Publications/OSHA3990.pdf
[6] https://www.cdc.gov/coronavirus/2019-ncov/community/pdf/Reopening_America_Guidance.pdf
[7] https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html & https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html

perform reverse engineering for specific operations or functions. Similarly, if workers continue to work remotely on a more regular basis, firms may need enhanced procedures for protecting networks.

Many firms operate in multi-unit and/or leased facilities. Consider how to work with facility and building management to implement physical changes to the workplace, potentially including restricted access, enhanced air filtration processes, and closed communal spaces (e.g., gyms, cafeterias).

Health Considerations

In areas where social distancing is challenging, firms may consider encouraging workers and customers to use cloth facemasks or other protective equipment, including Personal Protective Equipment (PPE) where possible. PPE in this context refers to N95 respirators, surgical masks, face shields, gloves, surgical gowns, and other professional grade protective equipment above cloth face coverings. As the virus can be spread by individuals who are asymptomatic or pre-symptomatic the CDC recommends that everyone wear a cloth face covering in public settings where other social distancing measures are difficult to maintain, and OSHA recommends allowing workers to wear masks to prevent the spread of the virus.[8] Consider federal, state, and local requirements for PPE and cloth face coverings prior to implementing any policies and procedures. If firms are experiencing a shortage of PPE where its use is necessitated by law or regulation firms may contact their local emergency management agency to assist with acquiring supplies.[9]

As medical and technology developments continue to progress various methods can be used as an indicator for the health of workers, such COVID-19 testing, temperature checks, and health assessments.

> COVID-19 Testing: According to Equal Employment Opportunity Commission (EEOC) guidance, employers may choose to administer COVID-19 testing to workers before they enter the workplace.[10] Because these types of tests and controls are relatively new, their accuracy is still unknown. Additionally, many unknowns remain about how employers appropriately administer testing. Consult all available guidance from federal, state, and public health authorities prior to making the determination to conduct COIVD-19 testing.

> Temperature Checks: Firms may consider conducting temperature checks of workers. The Americans with Disabilities Act includes protections for worker medical information, including worker temperature reports. Consider federal, state, and local requirements and guidance for conducting and documenting temperature checks. Practices for conducting temperature testing may include: communicating clearly with workers about temperature checks and related implications, setting a temperature threshold, facilitating testing in the least invasive way possible, and appointing someone with proper training to administer testing. Firms may also consider self-administered temperature checks, which may reduce any potential concerns from a compliance or privacy perspective.

> Health Assessments: Firms may consider developing practices for workers to self-assess whether they have a fever or other COVID-19 symptoms as identified by the CDC. For example, firms may consider installing stations within the workplace for voluntary self-assessments of the

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[8] https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover.html
[9] https://www.fema.gov/emergency-management-agencies
[10] https://www.eeoc.gov/laws/guidance/pandemic-preparedness-workplace-and-americans-disabilities-act

worker's health, or firms could offer electronic assessments tools to workers prior to them entering the workplace. The CDC has a self-assessment tool to help with this process.[11]

Based on the current guidance available and the novelty of the situation, the scope and levels of liability risk that firms may face in return to office practices is unclear. For example, it is unclear whether firms will face liability concerning requiring the use of PPE or cloth facemasks, conducting testing, or performing other medical screening. Monitor guidance from government entities and public health agencies and consult with legal counsel prior to implementing these processes.

Communicating with the Workforce and Customers

When implementing any changes to the workplace or specific requirements for workers, it is important for firms to communicate with the workforce. Consider providing transparency into the decision-making process and, to the extent possible, candidly communicate with workers. Communications may include details on which workers are returning to the workplace and why, processes for enhanced cleaning and disinfecting, and processes for any medical screening of workers. It is important for firms to take into account applicable legal privacy protections and policies and include any privacy needs within planning processes for returning to normal operations. During the planning process, firms may want to consider what data will be collected and for how long, who will have access to it, how it will be destroyed after its legally permitted retention period, and the legal permissibility of collection and use of data collected.

It is also important for firms to communicate with customers. Consider open communications with customers around expectations for wearing face coverings, processes for medical screening, and expectations for reporting positive cases.

Relevant Guidance Available for Reference

It is important to note that municipal and state orders and announcements, and corresponding recommendations and guidance issued by relevant government entities and public health agencies, are changing rapidly as the COVID-19 pandemic evolves. The following guidance documents may be helpful for financial services firms to consider in returning to normal operations:

- CDC Implementation of Mitigation Strategies for Communities with Local COVID-19 Transmission
- CDC – Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19
- CDC – Workplaces During the COVID-19 Pandemic
- EEOC Pandemic Preparedness in the Workplace and the Americans with Disabilities Act
- FEMA COVID-19 Pandemic: Addressing PPE Needs in Non-Healthcare Setting
- OSHA Discretion in Enforcement when Considering an Employer's Good Faith Efforts During the Coronavirus Disease 2019 (COVID-19) Pandemic
- OSHA – Guidance on Preparing Workplaces for COVID-19

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[11] https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html#cdc-chat-bot-open

Examples of considerations for specific facilities

As previously mentioned, plans and considerations for returning to normal operations are inherently workplace and location specific. The following are considerations firms may take into account for specific locations, including bank branches, high-rise office buildings, and data centers.

Bank Branches: As state and local governments begin to lift stay-at-home orders, firms may reconfigure bank branches to support social distancing. This may include:

- Implement a pilot program or phased rollout of certain branch openings in locations where state and local governments have lifted restrictions
- Create rotational teams of branch workers who work in weekly shifts, in order to avoid cross-contamination and maintain continuity of operations if an worker on one shift develops COVID-19 symptoms
- Modify branch hours, and potentially adopt specific hours to serve vulnerable populations
- Limit the number of customers within the branch at one time
- Establish appointments for in-branch visits to limit volume and traffic
- Provide disposable face masks to customers upon entering the branch
- Utilize a greeter to check the customer's identity so that the customer only has to lower their mask one time
- Install physical barriers between tellers and customers
- Install appropriate signage indicating requirements for social distancing and/or face mask use

High-Rise Office Buildings: Many financial services firms have office spaces in high-rise buildings creating unique challenges for returning to the workplace. Firms may consider the following:

- Ensure building management has coordinated with all tenants regarding guidelines for building access and use
- Communicate with commercial facilities on enhanced air filtration processes
- Limit the number of people in elevators at one time
- Stagger work shifts to ease bottlenecks of elevator lines
- Limit the number of people in conference rooms by removing chairs
- Close smaller conference rooms if social distancing measures cannot be maintained
- Close common spaces, such as cafeterias, gyms, or restaurants
- Enable internal doors to be opened by a push rather than with a handle or knob that must be grasped
- Limit materials on desks to only computer and monitor related equipment

Operational Facilities: Many financial services firms rely on operational facilities, such as data centers or call centers, for continuity of operations. Firms may consider the following:

- Establish work zones across facilities and ensure workers only access their "zones"
- Establish controlled entry points
- Set up sanitizing stations
- Extend shift lengths to reduce the rotation of worker
- Encourage worker to wear face coverings or gloves

Maintaining continuity of operations

The financial services sector operates globally in a continuous manner across operations. Operational strategies to deliver these operations continue to be important in today's environment. Such strategies may include, but are not limited to:

- Utilize both primary and backup locations to re-introduce worker quickly while continuing split-site operations
- Diversify the work location of critical worker (e.g. work from home, in office, unique geographies) to continue the operation of critical functions in the event of another disruption
- Operate in shifts to reduce frequency of worker interaction
- Stagger work start times to prevent groups of people entering the office or using the elevator at the same time
- Develop continuity plans for situations that may require more abrupt transitions back to the office, such as power outages, failure of remote access systems, and internet or telecommunications disruptions
- Remain flexible and adjust approach as the situation changes while managing the expectations of workers (e.g. if firms transition back to a remote environment during a second wave)
- Minimize travel to what is absolutely critical and consider implementing self-quarantine procedures after essential travel

Current financial sector regulations and reporting requirements

Firms are encouraged to maintain contact with their regulators to ensure that as firms return to normal operations, they are aware and able to take the necessary steps to be in compliance. The following existing guidance that may apply to your operations:

- FFIEC Interagency Statement on Pandemic Planning
- Commodity Futures Trading Commission COVID-19 Site
- Conference of State Bank Supervisors Information on COVID-19 Coronavirus
- Farm Credit Administration Coronavirus Site
- Federal Deposit Insurance Corporation Coronavirus Information for Bankers and Consumers
- Federal Housing Finance Agency COVID-19 Information and Resources
- Federal Reserve Board COVID-19 Supervisory and Regulatory FAQs
- National Association of State Credit Union Supervisors COVID-19 Resources & Guidance
- National Association of Insurance Commissioners Coronavirus Resource Center

- [National Credit Union Administration Coronavirus Information for Federally Insured Credit Unions and Members](#)
- [North American Securities Administrators Association Novel Coronavirus COVID-19 Updates](#)
- [Office of the Comptroller of the Currency COVID-19 Site](#)
- [Securities and Exchange Commission COVID-19 Quick Reference Guide for Investors and Market Participants](#)

Appendix: Questions to Consider for Returning to the Workplace Aligned to Local Guidance

The following table may help financial firms determine the readiness of their workforce and workplace in returning to normal operations. The CDC provides additional guidance for reopening workplaces during the COVID-19 pandemic.[12]

Local Guidance	Worker Health and Safety	Office Preparation	Operational Considerations
State/local stay-at-home orders in effect	What worker can reasonably perform their duties in telework environments? Are there worker members, such as those outlined in the essential workers guidance, necessary in the office?[13] What are the legal requirements for Personal Protective Equipment or cloth face masks? If not legally required, what is the access to cloth face masks for workers?	What hand washing facilities, cleaning wipes, or hand sanitizer is available?	What operations can be conducted remotely? What is the procedure for cleaning and notification of other worker in the office, if a case is identified?
State/local stay-at-home orders lifted; significant restrictions on gathering in public, businesses, schools remain in effect	What is the process to provide flexibility for workers who are uncomfortable to return to the office based on their health situation, childcare challenges, community spread, and transportation challenges? For worker at higher risk according to CDC guidelines, what is the	What additional barriers or routines can be implemented to encourage social distancing measures (6 feet at all times) for workers who are returning to work? Are there any specific efforts that can be implemented in common areas such as bathrooms, conference rooms, lobbies, kitchen, and break areas?	What are the plans to manage absenteeism in the event that worker infection rates increase? Can sequential workforce management be used to enforce worker spacing such as restricting the number of worker in the office per team via rotations?

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[12] https://www.cdc.gov/coronavirus/2019-ncov/downloads/community/workplace-decision-tree.pdf
[13] https://www.cisa.gov/publication/guidance-essential-critical-infrastructure-workforce

	process to remain a remote worker?[14] What does the local, state and/or federal guidance provide around criteria for workers returning to work via each phase (e.g. testing, hospital status, confirmed cases)? What worker incentives could be offered to encourage worker use of alternate transportation to public transit? What alternate work hours could be offered so worker can avoid public transportation during regular commuting hours? What are the legal requirements for Personal Protective Equipment or cloth face masks? If not legally required, what is the access to cloth face masks for workers? How are worker self-assessments and self-reporting with respect to COVID-19 infection encouraged? How might virus testing be offered to higher-risk workers (elderly or with pre-existing conditions)?	What measures can be implemented to decrease exposure risk in elevators, such as additional cleanings, installing hand sanitizer, programming elevators to return to the ground floor, opening stairwells and designate "up" and "down" stairwells? How will worker access or store meals, if the surrounding community is closed? How will expectations be communicated in the office (e.g., signage on social distancing, hand washing, mask wearing in public areas, and shift in office)? What limitations or restrictions can be put in place in conference rooms and training rooms to limit or restrict operations (e.g. limit use time per individual to reduce viral load) or configure to permit social distancing? What is the availability of cleaning wipes and hand sanitizer in the workspace? What entry points can be reduced to increase ability for enforcement of expectations?	What worker members provide essential services and operations, or what teams may work more effectively in the office? What meetings or conferences could take place virtually? What is the procedure for cleaning and notification of other worker in the office, if a case is identified?

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[14] https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html

Further easing of restrictions on gatherings, businesses; schools/care providers still closed or highly restricted.	How can the firm encourage use of masks or cloth face coverings, particularly around higher risk individuals (elderly or with pre-existing conditions)? What is the process to provide flexibility for workers who are uncomfortable returning to the office based on their health situation, childcare challenges, community spread, and transportation challenges? How can the firm encourage worker self-assessments and self-reporting with respect to COVID-19 infection? How might virus testing be offered to higher-risk workers (elderly or with pre-existing conditions)?	How can workers' workspaces be spaced out (e.g. by closing every other workstation, staggering hours, implementing worker rotation)? What limitations or restrictions can be put in place in conference rooms and training rooms to limit or restrict operations (e.g. limit use time per individual to reduce viral load) or configure to permit social distancing? How will expectations be communicated in the office (e.g. signage on social distancing, hand washing, mask wearing in public areas, and shift in office)? What is the availability of cleaning wipes and hand sanitizer in the workspace? What entry points can be reduced to increase ability for enforcement of expectations?	What plans are in place to manage absenteeism in the event that worker infection rates increase? Can sequential work force management be used to enforce worker spacing such as restricting the number of worker in the office per team via rotations?
Businesses/schools/care providers reopened, though some restrictions/ modifications to operations may still be in effect	How can the firm encourage use of masks or cloth face coverings by high risk individuals (elderly or with pre-existing conditions) and by others in proximity to high risk individuals? What is the process to provide flexibility for workers who are uncomfortable returning to the office based on their health	How can high risk individuals be provided spacing of 6 feet for their workspace? How will awareness items be shared (e.g., signage) on social distancing, hand washing, mask wearing in public areas, and work group or shift to be in the office that day?	

	situation, childcare challenges, community spread, and transportation challenges? How can the firm encourage worker self-assessments and self-reporting with respect to COVID-19 infection? How might virus testing be offered to all workers?	What is the availability of cleaning wipes and hand sanitizer in the workspace?	