# IBA REOPENING RESOURCE
# For Indiana Bank Offices and Lobbies
### Updated 5/22/2020

Throughout the COVID-19 pandemic, banks have remained open as essential businesses. While most bank lobbies temporarily closed to foot traffic, banks have continued to provide services through drive-thrus, lobby access by appointment, and alternative delivery options such as online banking, ATMs and telephone banking.

As Indiana progresses through its five-phase reopening process, the Indiana Bankers Association offers this Reopening Resource for bank offices and lobbies. This guidance is in accordance with Gov. Holcomb's "Back on Track" plan, which is subject to change based on guiding principles, CDC guidance and other factors.

The IBA Reopening Resource is intended as guidance only. Scheduling details and other specifics are at the discretion of each financial institution. Information provided in sections: (1) Requirements implemented before May 11; (2) Retail, office and general business guidelines; (3) Back on Track stages in Indiana; (4) Considerations for making/implementing plans; and (5) Templates and other resources.

## 1. REQUIREMENTS implemented before May 11
*Financial institutions were required prior to May 11 to develop a plan "to implement measures and institute safeguards to ensure a safe environment for their employees, customers, clients, and members." This plan must be (i) provided to each employee, and (ii) posted publicly. FIs are also required to continue to comply with all IOSHA standards. The plan is required to address, at a minimum, the following points:*

- Instituting an employee health screening process;
- Employing enhanced cleaning and disinfecting protocols for the workplace, including regularly cleaning high-touch surfaces;
- Enhancing the ability of employees, customers and clients to wash hands or take other personal hygiene measures such as use of hand sanitizer; and
- Complying with social distancing requirements established by the CDC, including maintaining six-foot social distancing for both employees and members of the general public when possible and/or employing other separation measures such as wearing face coverings or using barriers.

*Although the Order does not subject financial institutions to the additional conditions and restrictions for retail businesses generally, FIs may find additional guidance in these requirements as it relates to the lobby areas, such as:*

- Limiting the number of customers in a facility at any given time to no more than 50% of occupational capacity;
- Limiting hours of operation and considering implementation of separate operating hours for the elderly and other vulnerable customers; and,
- Requiring customer-facing employees to wear face coverings and considering a requirement that customers wear face coverings (with appropriate removal for identification purposes).

*Local municipalities may impose stricter requirements. All businesses should take into consideration any rules or orders of local municipalities as well.*

## 2. GUIDELINES – Retail, Office and General Business

Gov. Holcomb has provided industry-specific guidelines, including general business guidelines listed below. Banks should be aware of not only general business guidelines, but also both retail and office guidelines. Click to view full retail and office guidelines.

**General Business Guidelines**

- Vulnerable Employees and Customers – Those age 65 and over and individuals with identified high-risk conditions are particularly vulnerable to coronavirus. As much as possible, these individuals should continue to work remotely and to refrain from visiting businesses.
- Employee Screening Procedures – Conduct daily health assessments by utilizing a screening procedure for COVID-19 symptoms for employees who report for work. Examples include self-assessments before arrival in the workplace, use of screening questions, or taking temperatures with a no-touch thermometer.
- Personal Protective Equipment – Identify how personal equipment will be used in the workplace, including masks, face coverings or other protective gear.
- Social Distancing – Mitigate exposure in the workplace by implementing social distancing guidelines. Ensure a minimum of 6 feet between people, which may be accomplished in a number of ways. Examples include physical barriers such as sneeze guards, limiting capacity, altering shifts, line markings, using appointments whenever possible, and limiting close interactions with customers.
- Workplace Cleaning and Disinfection – Implement practices according to CDC guidelines, with regular cleaning of high-touch surfaces throughout the workday and at the close of business or between shifts.
- Personal Hygiene – Ensure that employees, customers and clients have ready access to hand sanitizer, handwashing stations or other disinfectant products.
- Employees With Symptoms – Have a plan in place in case an employee presents symptoms. Resources for testing are available in Indiana through medical providers and the OptumServe testing procedure.
- Implement Plans for Positive COVID-19 Cases – Be in touch with your local health department and follow CDC guidelines to monitor COVID-19 cases and deep clean your facility.
- Signage – Post signage about health policies and practices in common areas for employees and customers to see.
- Remote Work – Continue to encourage remote work as much as possible.
- Families First Coronavirus Response Act – Employers and employees should be aware of the provisions of this act.

## 3. BACK ON TRACK Stages in Indiana

Click on each stage number below for details:

**Stage 1** - March 24-May 4 (completed)

## 4. CONSIDERATIONS for making/implementing plans

**Face masks**

Employees – for all, some or none?
- If for all, under what circumstances?
- If for some, who?
- If none, may employees elect to wear masks? If yes, who provides?

If employees wear masks, cloth or disposable?
- If cloth, may employees customize their own?
- If disposable, to be used more than once? N95 or other type?

Customers – wear masks for hygiene or no masks for security?
- If masks required, do customers show ID? If so, how is ID check conducted?
- If masks required, are exceptions granted? What is the procedure in the event of refusal?
- If <u>not</u> to wear masks but customer prefers to, how to direct to drive-thru/alternate delivery?

**Health assessments**

Employees – See Symptom Assessment form in "Templates and Other Resources" section.
- Temperature checks required?
  o If so, self-assess at home, or checked onsite?
     (If at home, does the bank need to provide thermometers?)
     (If onsite, who conducts, and how to follow hygienic practices?)
  o If so, what is the temperature cutoff for not being permitted to come on premise?
- Screening questions mandated?
  o If so, self-assess at home, or questions asked onsite?
  o If onsite, who conducts, and how to follow social distancing?
  o Which responses require that the employee not come on premise?

Customers
- Will customers need to have temperature checked?
  o If yes, who conducts, and how to follow hygienic practices?
  o If yes, what is the temperature cutoff for not being permitted to enter the building?
- Will customers need to answer screening questions?
  o If yes, who conducts, and how to follow social distancing in asking questions?
  o If yes, which responses require that the customer not enter the building?

**Cleaning/disinfecting and social distancing**

Cleaning
- How will cleaning be enhanced, especially for high-touch surfaces? Which surfaces are high-touch?
- Who is responsible?

- How to ensure availability of cleaning products?

Hand washing/hand sanitizing
- What are the requirements/procedures for employees?
- What are the requirements/procedures for customers?
- How to ensure availability of hand sanitizer?

Social distancing - six feet of separation
- Where do employees need social distancing from each other, and how to ensure it?
- Where do employees need social distancing from customers, and how to do it?
- Where do customers need social distancing from each other, and how to ensure it? For example, in line, waiting in the lobby, at the ATM, etc.

Barriers - Where would germ guards help protect employees and customers?

Removal of high-touch objects - What items can be removed from the lobby to promote distancing? For example, chairs, candy dishes, in-house pens. (Pens could be provide in bulk with invitation to customers to take home.)

Customer limits – If limiting number of customers in the lobby, how to monitor and implement?

Hours of operations – If limiting hours, providing special hours for at-risk customers? Keeping all branches on same schedule?

**Travel policies for employees**

Is leisure travel permitted?
- If yes, must it be reported?
- If yes, under what circumstances must an employee self-quarantine following leisure travel?

Business travel/external training
- What are the guidelines for business-related travel re: visiting clients, traveling between branches, attending training/networking events?
- Under what circumstances must an employee self-quarantine following business travel?

**Positive COVID-19 diagnosis**

What are the procedures to follow regarding quarantine, branch closure, notification to customers, etc., in the following circumstances?
- An employee tests positive
- An employee displays COVID-19 symptoms but is not tested
- An employee is in direct contact with someone who tests positive
- A customer tests positive
- A customer is in direct contact with someone who tests positive

**Policy Adjustment**

What are the triggers for loosening or tightening restrictions?
- For example, guidance from the state of Indiana? Local ordinances? School and/or daycare opening/closing?

**5. TEMPLATES and other resources**

**Customizable signs** – May add bank logo

Entrance signs

- [Click to download option 1](), masks required
- [Click to download option 2](), masks permitted
- [Click to download option 3](), no masks permitted

Interior sign – [click to download]()

**Symptom Assessment Form** – For employees

- [Click to download form]()

**Additional resources –** From ABA and ICBA

- [Click for matrix]() from the American Bankers Association
- [Click for guide]() from the Independent Community Bankers of America