

Reopening Branch Lobbies

Many states have begun taking its first steps toward reopening, at least partially, since the COVID-19 pandemic and many of our members have been trying to figure out the steps for reopening their branch lobbies. There are many considerations when reopening branch lobbies including practicing social distancing and other measures to prevent the spread of COVID-19 while keeping compliant with all the other rules and regulations that traditionally governed bank operations. One of the biggest concerns is that, banks want to provide a safe work environment by having customers and employees wear face masks, but there are also other risks involved by having everyone in the branch wear a mask. This is becoming a growing issue with the increasing bank robbery attempts since some branches reopened.

Just as how many grocery stores and other essential businesses have been implementing different practices for trying to keep the facilities safe for the public, we recommend banks implement procedures for cleaning and disinfecting the branches. The banks should have a policy in place to disinfect the lobby during the hours of operations, meaning the procedures would include a systematic process in place. Additionally, providing hand sanitizer at the entrances would help bank customers feel that much safer. These procedures are generally not ones we had prior to the pandemic and could take some time to get used. However, if banks are distributing hand sanitizer in the branches, it is crucial to not overlook the smaller steps. This means that if there are hand sanitizer dispensers in the branches, someone should monitor the dispensers and it would be ideal to have steps in place for refilling them as well.

To streamline this process, it could be helpful to temporarily have only one entrance/exit available, and to have the bank security guards at these points to control access to the banks' lobbies. This would ensure that the banks are able to maintain its maximum capacity that they have set and that the customers will be able to practice social distancing measures when they are inside. Additionally, while controlling the entry point, the banks could also have an employee accompany the guard to give prescreening questions and possibly take temperatures of the visitors to mitigate risk for everyone else inside. We have a customer prescreening questionnaire for the banks to use in our pandemic toolkit.¹

When inside the branches, the first key aspect to think about is to encourage social distancing within the branch lobbies. To assist in practicing social distancing, banks could place markers on the floor to help guide customers in how far they should stand from others. Additionally, banks could consider putting signs in the branches, including at the teller and ATM locations that customers should stand apart from one another. Banks should also consider implementing procedures to help employees social distance from one another as well. Banks could space out the tellers and bankers, and also possibly use separators where it is necessary (i.e. between teller stations and between the bankers' desks and customers).

¹ Customer Prescreening Questionnaire: https://compliancealliance.com/uploads/files/general/COVID-19_Customer_Prescreening_Questionnaire_v2.docx

Secondly, banks should ensure that the security cameras in the branches are operating properly. This includes network scans and making sure that all the necessary patches are up to date. Banks should also double check storage capacity as well so that the cameras can operate as intended. Recently, there have been many instances where situations escalate and sometimes even become violent in nature when customers have been asked to wear facial covering prior to entering. In these times of panic and paranoia, having fully functional security cameras would be crucial. And in relation to these aggressive scenarios, having a procedure, and training in place to de-escalate situations would certainly help trying to keep everyone as safe as possible.

Another big question is whether bank employees could ask customers to remove their facial masks and coverings for customer identification purposes. This is essential for “know your customer” procedures and fraud mitigation. Banks are allowed to ask customers to remove their masks to ensure that the customer is the correct person and matches the government identification. There has not yet been any guidance from the regulators discussing the duration of how long to ask customers to remove their face masks, but as long as it is reasonable, there isn’t a prohibition in making this request to the customers. Consequently, banks would be able to continue complying with its customer identification procedures and other Bank Secrecy Act requirements in verifying government identification documents. When following this protocol, banks should remember to ensure the camera angles are adjusted so that it can capture the faces when the customers remove their face masks.

Aside from the policies and procedures during the hours of operation, banks should think about their opening and closing procedures. This includes both safety measures and cleaning the branch. If the bank is using outside cleaners prior to and/or after business hours, banks should also vet these service providers and make sure that they are insured as well. Additionally, banks should decide whether they would be staggering employees’ hours as this could help in practicing social distancing for the employees and staff members of the bank.

With the COVID-19 pandemic disrupting the way we used to conduct business, many states are allowing businesses to slowly open back up to get back to “normal.” In this attempt to get back to how things used to be, banks should take the proper precautions to help both employees and customers feel safe, while also complying with the regulations that continue to govern bank activities. We have created a checklist² and a cheat sheet³ to help guide in the preparation of this task. For more information, you can watch our webinar for reopening branch lobbies which was held recently.⁴ Additionally, a FAQ is also available on the webinar page.

² A checklist for Re-opening Branch Lobbies is available on our website:

https://www.compliancealliance.com/uploads/files/general/Checklist_Covid19_Reopening-v3.doc

³ A cheat sheet for Re-opening Branch Lobbies is available on our website:

https://www.compliancealliance.com/uploads/files/general/COVID-19_Reopening_Cheat_Sheet.pdf

⁴ A Guide for Reopening Financial Institutions in Covid-19 Webinar: <http://compliancealliance.com/news-events/a-guide-for-reopening-financial-institutions-in-covid-19>

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Kevin Kim joined Compliance Alliance after graduating from the Benjamin N. Cardozo School of Law in 2019. He currently serves our members as one of our hotline advisers, where he spends his days guiding our members and writing articles for our weekly and monthly publications.

Before C/A, he worked at Galaxy Digital and Refinitiv (formerly Thomson Reuters Financial and Risk) as a law clerk. He also opened a cryptocurrency mining farm, and founded an after-school program business in his native New York City. His unique experience and outlook have brought an invaluable new dimension to our group.