

COMPLIANCE ALLIANCE POST COVID-19 RE-OPENING CHECKLIST

The purpose of this Post COVID-19 Re-opening Checklist is to provide best practices and guidance for consideration as employees, customers, and visitors are welcomed back inside the financial institution. Due to the ever-changing environment and unique characteristics of each financial institution, the re-opening plan will require flexibility until a new sense of “normal” is achieved or the COVID-19 risk has been properly mitigated.

RE-OPENING BANK LOBBY	
<p>GOAL: Ensure a safe environment where customers and visitors can conduct banking business and essential operations.</p>	
STRATEGIC RISK (arise from business decisions)	
<input type="checkbox"/>	<p>Develop and/or review the bank’s re-opening/continuing operations strategic plan, including:</p> <ul style="list-style-type: none"> ➤ Mission, vision, and values. ➤ External environment. <ul style="list-style-type: none"> ○ Federal, state or local government guidance. ○ Bank industry specific guidance. ○ Third-party partner guidance. ➤ Internal environment. ➤ Alternatives strategies. ➤ Contingency plan (i.e.- Business Continuity Plan).
<input type="checkbox"/>	<p>Consider federal, state, or local requirements regarding access to the bank.</p> <ul style="list-style-type: none"> ➤ COVID-19. ➤ Equal Employment Opportunity Act (EEOA). ➤ Americans with Disabilities Act (ADA) accommodations.
<input type="checkbox"/>	<p>Engage in risk discussions with <u>ALL</u> functional areas or departments of the bank.</p> <ul style="list-style-type: none"> ➤ Each team plays an important role and brings a unique perspective.
<input type="checkbox"/>	<p>Engage counsel regarding re-opening plan.</p> <ul style="list-style-type: none"> ➤ In-house and/or outside counsel. ➤ EEOA counsel.
<input type="checkbox"/>	<p>Engage insurance provider regarding coverage.</p>
SAFETY RISK (potential harm to customers and employees)	
<input type="checkbox"/>	<p>Deep clean the lobby bank and other high traffic areas prior to re-opening.</p> <ul style="list-style-type: none"> ➤ Cleaning practices at a minimum should meet current Center for Disease Control and Prevention (CDC) COVID-19 guidance (CDC COVID-19 Cleaning Practices).



<input type="checkbox"/>	Install partitions to buffer between bankers and customers.
<input type="checkbox"/>	Post clear signage regarding the bank's COVID-19 requirements, including: <ul style="list-style-type: none"> ➤ Protective facial covering requirements (dependent on federal, state, or local authorities – i.e.- require vs. encourage). ➤ Social distancing practices – maintain 6ft away rule.
<input type="checkbox"/>	Provide hand sanitizers for employees, customers, vendors, and the like, including at: <ul style="list-style-type: none"> ➤ Main entrance(s) ➤ Teller and branch locations ➤ Offices ➤ Randomly throughout the facility.
<input type="checkbox"/>	Develop a temperature screening practice for visitors prior to entrance (allowed/common practice during a pandemic).
<input type="checkbox"/>	Establish maximum occupancy for the bank and/or specific area(s), including lobby and communal areas, as applicable <ul style="list-style-type: none"> ➤ Federal, state, or local guidance – i.e. – 25%, 50%, etc.).
<input type="checkbox"/>	Limit customer and visitor entry to one entrance.
<input type="checkbox"/>	Modify or stagger hours of operations. <ul style="list-style-type: none"> ➤ Branch or location specific. ➤ Special hours for the at-risk population or first responders. ➤ Consider impact to customers and community.
OPERATIONAL RISK (failure of process, people, and systems)	
<input type="checkbox"/>	Communicate and train appropriate team members regarding COVID-19 strategic plans and facility practices.
<input type="checkbox"/>	Communicate and training employees regarding “Know Your Customer” procedures <ul style="list-style-type: none"> ➤ Removal of facial coverings. ➤ Gathering ID’s. ➤ Fraud mitigation.
<input type="checkbox"/>	Assign an employee or team to monitor and administer safety and crowd control practices. <ul style="list-style-type: none"> ➤ Maximum capacity. ➤ Physical security ➤ Temperature taking. ➤ Social distancing. ➤ Escalation of issues.

<input type="checkbox"/>	<p>Execute a temperature screening practice for visitors prior to entrance (allowed/common practice during a pandemic).</p> <ul style="list-style-type: none"> ➤ Risks to consider: <ul style="list-style-type: none"> ○ Acceptable temperature reading (Federal, State or local guidance). ○ Customer refusal guidelines. ○ Failed test action plan. ○ Refer for medical attention. ○ Re-test periods. ○ Asymptomatic virus spread. ○ Insurance liability coverage.
<input type="checkbox"/>	<p>Pre-order necessary cleaning and sanitary supplies as they may be in high demand, including:</p> <ul style="list-style-type: none"> ➤ Masks, gloves, proper cleaning disinfectants, hand sanitizer, non-contact temperature reader, paper towels, garbage bags, etc.
<input type="checkbox"/>	<p>Refill hand sanitizers, as needed, for those entering the bank, including employees, customers, vendors, and the like, including at:</p> <ul style="list-style-type: none"> ➤ Main entrance(s) ➤ Teller and branch locations ➤ Offices ➤ Randomly throughout the facility.
<input type="checkbox"/>	<p>Sanitize hard surfaces throughout the day, especially in high traffic areas.</p> <ul style="list-style-type: none"> ➤ Regular intervals, such as hourly, every other hour, or randomly based on traffic. ➤ Ensure team members practice safe cleaning protocols if required, such as: ➤ Masks, gloves, proper cleaning disinfectants and disposal of (CDC COVID-19 Cleaning Practices).
<input type="checkbox"/>	<p>Deep clean bank facility each night, especially in high traffic areas (CDC COVID-19 Cleaning Practices).</p> <ul style="list-style-type: none"> ➤ Add/renew custodian vendor services.
<input type="checkbox"/>	<p>Discuss and review insurance coverage with provider.</p>
SECURITY RISK (possible threat from person or situation)	
<input type="checkbox"/>	<p>Access physical security risk and develop a plan.</p>
<input type="checkbox"/>	<p>Ensure security cameras are functional.</p> <ul style="list-style-type: none"> ➤ Network scans and patches up to date. ➤ Storage capacity appropriate.
<input type="checkbox"/>	<p>Assign an employee or team to monitor and administer security practices.</p>

<input type="checkbox"/>	<p>Communicate and train appropriate team members regarding physical security requirements and procedures.</p> <ul style="list-style-type: none"> ➤ Awareness. ➤ Visitor identification procedures, including facial covering impact. ➤ Robbery procedures, including bait money and silent alarms. ➤ De-escalation techniques.
<input type="checkbox"/>	Station armed guards.

HR RISK (people are the source of risk)

<input type="checkbox"/>	Engage EEOA counsel.
<input type="checkbox"/>	<p>Communicate COVID-19 strategic planning and bank-wide initiatives.</p> <ul style="list-style-type: none"> ➤ Employees will need time.
<input type="checkbox"/>	<p>Develop employee screening measures, including:</p> <ul style="list-style-type: none"> ➤ Create employee COVID-19 attestation form. ➤ Develop temperature screening practices. ➤ Ensure confidentiality measures are in place. ➤ Worst-case scenario action plans.
<input type="checkbox"/>	<p>Provide training regarding COVID-19 guidelines for employees, including:</p> <ul style="list-style-type: none"> ➤ Reporting symptoms. ➤ Practice generally accepted hygiene practices. ➤ Social distancing.
<input type="checkbox"/>	Consider modifying or staggering employee work schedules.
<input type="checkbox"/>	<p>Flexible work from home privileges and use video conferencing tools to limit in-person meetings based on job roles.</p> <ul style="list-style-type: none"> ➤ Review and/or develop temporary and permanent telecommuting opportunities.

Additional Comments:

Reviewer:

Date of Review:

