Governor Greg Abbott established the Strike Force to Open Texas following the COVID-19 emergency. The Governor’s goal with the Strike Force is to “safely and strategically restart and revitalize all aspects of the Lone Star State — work, school, entertainment and culture.” Texas banks have heroically kept banking access open for Texas citizens throughout the emergency, even as many banks voluntarily closed lobbies and/or some branches to help “flatten the curve.” They have played an essential role in keeping our communities in business during the pandemic, and they will play a vital role in helping Texas to recover and prosper after it.

This document is intended to help Texas banks ask important questions for SAFELY re-opening lobbies and branches as they do their part to Open Texas for their employees, customers and communities.

**IMPORTANT CONSIDERATIONS:**

What are the current federal, state and local requirements?

**MINIMUM STANDARD HEALTH PROTOCOLS**

In EO GA-18, Gov. Abbott released a set of minimum standard health protocols for all businesses operating in Texas. Employers may adopt additional standards as they see fit to ensure the health and safety of all employees and customers.

Read the Governor’s Report to Open Texas. [gov.texas.gov/organization/opentexas](http://gov.texas.gov/organization/opentexas)

See p.21 for the Checklist for Employers.

**WILL YOU:**

- Stay up-to-date on new laws, rules and regulations surrounding coronavirus?
- Open only a limited number of branches?
- Alter the physical layout of your locations to limit personal interaction?
- Conduct non-teller related business in an alternative location?
- Continue to see customers in the lobby by appointment only?
- Are there constraints that inhibit reopening? Identify them to develop solutions and a timeline to reopen, giving your employees and customers some peace of mind.
- Perhaps you never fully closed lobbies and have already made some of these suggested changes. Which of those changes should remain in place? Should any be phased out?

**HOW WILL YOU ENSURE THE HEALTH AND SAFETY OF EMPLOYEES?**

The most up-to-date information can be found at [www.texasbankers.com/coronavirus](http://www.texasbankers.com/coronavirus).

- The American Bankers Association has issued helpful FAQs that address workforce health and safety.
- The Centers for Disease Control and Prevention has published guidelines for cleaning of workplaces. Be sure to check with your local jurisdictions in case they have ordered specific cleaning processes.
- Keep employees informed on how to prevent the spread of the virus.
WHAT IF AN EMPLOYEE TESTS POSITIVE FOR COVID-19?

TBA suggests developing a written policy if your bank’s existing policy does not cover this. The following details will need to be considered when addressing an employee that tests positive for COVID-19.

COVID-19 is a recordable illness when a worker is infected on the job. Refer to the OSHA standards for reporting.

www.osha.gov/recordkeeping/index.html

To what extent should co-workers who may have been exposed be quarantined?

Has the employee interacted with customers while infected?

What are the legal implications if the employee was exposed at work?

Consider the implications to continuity of operations. See Business Continuity Planning Considerations COVID-19


HOW WILL BANKS HANDLE CUSTOMERS WHO ARE WEARING MASKS?

While state guidelines may not require employees or customers to wear masks, some individuals may continue to wear them out of concerns for their health. There are legitimate medical reasons for a customer to wear a mask. However, customers wearing masks may hinder an employee’s ability to properly identify customers.

Banks must still comply with “Know Your Customer” rules in this situation.

Develop a policy for identifying customers wearing masks based on the layout of your lobby, considering social distancing requirements, etc.

Consider the potential reputational harm in asking customers to remove masks.

What will employees do if a customer refuses to remove their mask even briefly?

For instance, some banks are considering establishing a point six-feet from the teller window at which a customer removes their mask for visual identification and then replaces the mask before moving closer.

HOW CAN BANKS PREVENT ROBBERIES WHEN MANY CUSTOMERS WILL BE WEARING MASKS?

To create an offset to identify possible threats, consider marking the floors and using ropes or signage to indicate how you would like customers to distance while in the lobby.

This may depend on whether social distancing requirements or building occupations limits are in place. Security cameras may need to be retrained to capture customer images based on your identification process.

Lobby employees should be mindful to:

1) Identify any potential threats.
2) Interrupt the plan of a threat in order to de-escalate.

!! Be cautious with customers wearing more covering than a face mask.

!! New or enhanced lobby procedures may be enough to interrupt a planned robbery attempt.

!! If a threat chooses to go through with a robbery, law enforcement suggests employees follow existing robbery procedure.

STATE RESOURCES

Governor’s Strike Force to Open Texas
www.fgov.texas.gov/organization/opentexas

Texas Department of Banking
www.fdob.texas.gov

Texas Department of Savings and Mortgage Lending
www.fsml.texas.gov

FEDERAL RESOURCES

FEMA
www.fema.gov/coronavirus

FDIC

OCC

Federal Reserve Bank of Kansas City
www.kansascityfed.org/newsroom/covid-19-resources

Federal Reserve Bank of St. Louis
www.stlouisfed.org/covid-19

EEOC
www.eeoc.gov/eeoc/newsroom/wysk/wysk_ada_rehabilitation_act_coronavirus.cfm

BANK RESOURCES

Lobby Reopening Sign Suggestions (by Moody Bank)
www.texasbankers.com/LobbyReopenDesign