These days, we are hearing a lot about restarting the economy, which involves allowing businesses that were required to close during this ongoing public health emergency to reopen and permitting nonessential workers to return to work. While this sounds great in theory, as we are all eager to get back to “normal,” this isn’t a situation where doors can immediately be flung open and employees can return to work without restrictions.

In this article, we take a closer look at banks, how they have adjusted, and what needs to take place for branches to be ready for inside traffic once again. As an essential business, banks have continued to operate, but many changed gears by limiting access to branches and encouraging more online banking. With changes to stay-at-home orders happening or on the horizon, there are many practical implications that banks should start thinking about now to prepare for reopening branches or expanding operations and to create a safe environment once branch employees and customers return. Here are a few things to consider:

1. **Think about the physical act of reopening branches or expanding branch services.** Most, if not all, banks have temporarily closed at least some branches or limited branch operations, such as limiting customers to drive-through access and requiring customers to make appointments to be able to enter the branch. As life shifts toward the “new normal,” banks must begin identifying areas of business that are most in need of physical access to a
branch to ensure prioritization. Banks should start considering how many of their temporary measures, if any, will remain in place once the state and local directives are revised or lifted. Issues to address include (1) whether the bank should continue limiting customers to drive-through access for certain transactions and (2) whether the bank lobby should be open; if so, whether the number of customers allowed in at a time should be limited and by whom. Think practically about what needs to be done, and where, in order to physically reopen.

2. **Think about returning branch employees to work.** This process will vary on a bank-by-bank and branch-by-branch basis. A key issue that needs to be addressed is who will actually return to the workplace and when. Banks need to think about the employees who need to be physically present in the workplace to do their jobs, such as tellers, and contemplate returning employees to the workplace in waves, potentially prioritizing those who must be physically present. Banks should consider which employees can telework (or continue to telework) without affecting productivity, in order to cut down on the number of employees in the workplace. Banks must also look at the hours employees typically work and determine whether there should be any changes to schedules or work times. This could involve having different groups of employees in the office on different days. For example, some management-level employees could continue to work at home and come in only one day a week. The goal is to reduce branch capacity and thus potential exposure to COVID-19.

3. **Plan for keeping the workplace safe once branch employees and customers return.** Employers need to be proactive to mitigate the risk of exposing employees and customers to infection and creating a second wave of COVID-19 cases once branches reopen or expand operations. Regardless of which employees return to work and how often, banks need to develop and be prepared to enforce social distancing plans and other preventive measures. Banks should look at whether any physical modifications should be made to the workplace. For tellers, this may include extending partitions upward between stations or leaving every other station empty, building out stations to create more distance between tellers and customers, or putting in a clear shield at each station. In the lobby, this may include removing chairs temporarily so customers are less likely to linger, and rethinking where and how customers can complete deposit and withdrawal slips at the branch. In other areas of the branch, this may involve repositioning desks, creating additional space between cubicles, or closing conference rooms. And take this opportunity to stock up on proper supplies, such as cleaning supplies, hand sanitizer, and disinfectant to be used by customers and employees. Given the sheer number of high-touch surfaces in any given bank branch, there will be a lot of areas to sanitize throughout the day, so adequate supplies and a good cleaning protocol need to be considered.

4. **Stay current on applicable guidance.** All employers need to make sure they are up to speed on the most current Centers for Disease Control and Prevention and Occupational Safety and Health Administration guidelines for the workplace. Check state and local directives on who has to wear a mask, when, and where (cue the inevitable jokes about a customer walking into a bank lobby wearing a mask). But really, some states (such as Louisiana) require employees who have contact with the public to wear a mask, some have more- or less-stringent requirements, and others have none at all. To add another layer of
complexity, some cities have their own requirements; for example, Birmingham, Alabama, requires face coverings in public. Banks must ensure they are following all applicable rules on safety, which are regularly being revised.

5. **Begin putting together communications to employees and customers.** As much as we all want to return to business as usual, that isn’t the reality we’re facing right now. Employees need to understand that the workplace they return to won’t look or operate the way it did prior to the pandemic — there will be changes. Start working on messaging about the return-to-work process as well as expectations for employees once the branch reopens or expands operations. Customers, too, need to understand the changes occurring at bank branches. If customers will be coming into the lobby and interacting in person with tellers or other bankers, consider putting up signage that sets forth expectations for customers. If banks haven’t had drive-through service during the pandemic and are going to reopen this operation, they need to make sure they are thinking about that process, such as how and when to clean the canister and items exchanged to ensure both the customer and employee are comfortable and safe.

6. **Look back to plan for what’s ahead.** Before the stay-at-home orders were put into effect, we were all reacting to what was happening in the moment. Banks should reflect on their processes and how they will need to change when employees return to work. Ensure there’s a solid procedure for tracking and reporting illness as well as a plan for reporting workplace safety issues, such as a co-worker who isn’t practicing social distancing. Consider whether any leave policies need to be temporarily revised to allow, for example, for child care difficulties if child care facilities are still closed, as it looks like many will be through the summer. Banks should also take this opportunity to make sure the process for employees to request accommodations is working and that it’s clear who is responsible for engaging in the interactive process with employees.

With the stay-at-home directives starting to be lifted, there is an opportunity to be proactive rather than reactive. All banks should start planning now for the impending return to work of branch employees in order to do their part to keep the workplace safe once employees do return and customers resume banking in person.

© 2020 Jones Walker LLP