

OFFICE OF FINANCIAL INSTITUTIONS

OFI BULLETIN

BL-03-2020
April 1, 2020

TO: THE CHIEF EXECUTIVE OFFICER/MANAGER

FROM: JOHN DUCREST, COMMISSIONER

SUBJECT: CONTINUITY OF OPERATIONS PREPAREDNESS/PLANNING

In view of the ongoing threat and challenges associated with the Coronavirus (COVID-19), it is imperative that each financial institution ensures that its Disaster Recovery/Continuity Plans (“Plans”) are reviewed and updated as needed. It is important for you to review your Plans from an enterprise risk perspective in order to ensure that interdependent operations, and the personnel to carry them out, are considered. As a precautionary measure, financial institutions may want to consider implementing staggered shifts and/or mutual aid agreements to supplement possible staffing needs in order to deliver customer service to the community. It is important to consider all factors when making these decisions, including, but not limited to, any guidance regarding social distancing and hygiene for both employees and customers. Financial institutions should also consider the distribution of employees’ credentials should the local, state, or federal authorities close or restrict access to any area. The US Treasury recommends the following for credentialing: combination of the employee’s bank ID or letter from a state or federal supervisor (such as OFI), a copy of the [DHS Guidance document](#)¹ and [U.S. Treasury Secretary Mnuchin’s statement](#)².

This Office is supportive of any actions taken by a Louisiana State-Chartered Financial Institution employee or agent pursuant to its official, ESSENTIAL BUSINESS, relative to various state and federal emergency declarations and related statements issued in response to the COVID-19 pandemic. This includes official business travel across parish and/or state lines. We advise your staff and agents to have the documents recommended by the US Treasury with them as they travel on official business.

¹DHS Guidance document

https://www.cisa.gov/sites/default/files/publications/CISA_Guidance_on_the_Essential_Critical_Infrastructure_Workforce_Version_2.0_Updated.pdf

²Statement by Secretary Steven T. Mnuchin on Essential Financial Services Workers

<https://home.treasury.gov/news/press-releases/sm956>

The following guidance was developed with the assistance of the LBA and the LCUL, and from the original work of the Texas DOB, IBAT, and the TBA. As you work through this Guidance, your review may lead you to other factors that should be evaluated. The following considerations should be included in your review:

- Supply staff with protective equipment and training (e.g. masks, gloves, cleaning supplies, training on safety and hygiene, etc.).
- Update contact information with the institution's vendors/agents and understand their emergency response actions and plans. Identify any third-party services which might become impaired in an emergency and develop contingency plans.
- Communicate regularly, frequently, and through varied means with customers/members, staff, management, directors, volunteers, vendors/agents, and regulators; provide updates and feedback to ensure consistent understanding among all parties.
- Establish a contingency process for communicating with your customers/members, staff, management, directors, volunteers, vendors/agents, and regulators.
- Use staff logs to screen for potential employee health.
- Review your personnel policies and practices, particularly relating to paid time off (PTO) usage and/or remote work possibility (with consideration to ensuring secure data and communication).
- Identify critical operations and establishing a plan (with contingency plans) to ensure critical systems continue to operate, required reporting occurs, and service to members is uninterrupted. Critical systems to consider include the Core Processing System, ATM Processing and Replenishment, ATM/Point of Sale (POS) Limits (Can these be adjusted remotely?), Online Banking System, Debit/Credit Card Processing, Cash Letter>Returns, ACH Processing>Returns, and Wire Processing.
- Ensure the remote access functions for your critical systems and processes are available with adequate remote security. Other factors to consider with remote access is remote location availability, internet access and bandwidth, and multiple users accessing the system at one time.
- Ensure strong cross-training occurs, to minimize disruption if temporary or sustained absenteeism occurs.
- Establish communication strategies and alternative financial service delivery channels in the event one or more branches need to close temporarily (refer to the [OFI Depository 2020 Emergency Declarations](#)³ requirement to report closures). Contact OFI if a temporary location is needed.
- Ensure your automated information systems are capable and prepared in the event of higher transaction volumes (credit, debit, home banking, remote applications, email correspondences, etc.).
- Ensure your institution is prepared from a liquidity and cash standpoint, in the event of elevated withdrawal levels.

³ Depository 2020 Emergency Declarations [http://www.ofi.la.gov/DepositoryEmergencyDeclaration\(ED-Dep-01-20\).pdf](http://www.ofi.la.gov/DepositoryEmergencyDeclaration(ED-Dep-01-20).pdf)

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Your plans should be commensurate with the degree of complexity of your operations, considering each product/service your financial institution offers and all critical functions. Guidance issued by this office and federal agencies during this pandemic is detailed below.

Other Resources:

Louisiana Bankers Association – [2020 Coronavirus Resources webpage](#)

LCUL – [COVID-19 Resources](#)

Centers for Disease Control and Prevention (CDC) – [Businesses and Employers](#)

CDC – [Coronavirus \(COVID-19\)](#)

U.S. Department of Homeland Security – [Business Continuity Planning](#)

U.S. Department of Homeland Security – [CISA Essential Workforce Guidance](#)

U.S. Department of the Treasury – [Statement on Financial Services Essential Workforce](#)

FFIEC – [Business Continuity Management](#)

FinCEN – [FinCen Notice to Financial Institutions Regarding COVID-19](#)

FDIC – [Coronavirus \(COVID-19\) Information for Bankers and Consumers](#)

The Federal Reserve – [Reserve Administration National Business Continuity Information](#)

NCUA – [Coronavirus \(COVID-10\): Information for Federally Insured Credit Unions and Members](#)

OFI – [Emergency Declaration for Annual Meeting and COVID-19](#)

This Bulletin will also be posted on OFI's website at www.ofi.la.gov. If you have any questions, please contact Chief Examiner Jonathan D. Finley at 225-922-0637 or jfinley@ofi.la.gov.