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Pandemic Planning: Essential Critical Infrastructure Workers in the Financial Services Sector

To

Chief Executive Officers of All National Banks, Federal Savings Associations, and Federal Branches and Agencies; Department and Division Heads; All Examining Personnel; and Other Interested Parties

Summary

The Office of the Comptroller of the Currency (OCC) recognizes the potential for the coronavirus (also referred to as COVID-19) to adversely affect bank¹ operations, including the movement of workers responsible for the operations and maintenance of critical infrastructure. On March 19, 2020, the Cybersecurity and Infrastructure Security Agency (CISA) issued a memorandum and initial guidance identifying several categories of workers who conduct a range of operations and services essential to continued critical infrastructure viability. Among the workers that CISA identified are those in the financial services sector. On March 24, 2020, the U.S. Treasury Secretary

emphasized in a press release the importance of the financial services sector and reinforced the CISA guidance. This bulletin provides information for essential critical infrastructure workers during the COVID-19 emergency response.

Note for Community Banks

This bulletin applies to all OCC-supervised banks.

Highlights

Consistent with the March 19, 2020, CISA guidance and the U.S. Department of the Treasury's March 24, 2020, press release, the OCC

- encourages essential critical infrastructure workers to maintain normal work schedules during the COVID-19 emergency response. Essential critical infrastructure workers should follow guidance from the Centers for Disease Control and Prevention (CDC) and state and local officials regarding strategies to limit disease spread.
- provides considerations for banks related to the movement of essential critical infrastructure workers within and between restricted areas.

Background

In collaboration with other federal agencies and the private sector, CISA developed an initial list of "essential critical infrastructure workers" to inform state and local officials as they work to protect their communities, while ensuring the resiliency and continuity of functions critical to public health, safety, and economic and national security during the COVID-19 response. Among the workers included in CISA's list are those who support the financial services sector.

CISA has identified the following parts of the financial services sector workforce as essential:

- Workers who are needed to process and maintain systems for processing financial transactions and services (e.g., payment, clearing, and settlement; wholesale funding; insurance services; and capital markets activities)
- Workers who are needed to provide consumer access to banking and lending services, including automated teller machines, and to move currency and payments (e.g., armored cash carriers)
- Workers who support financial operations, such as those staffing data and security operations centers

The financial services sector relies on third parties and service providers in the information technology sector. CISA has identified the following parts of the information technology sector workforce as essential:

- Workers who support command centers, including network operations command centers, broadcast operations control centers, and security operations command centers
- Data center operators, including system administrators; heating, ventilation, and air conditioning technicians and electrical engineers; security personnel; information technology managers; data transfer solutions engineers; software and hardware engineers; and database administrators
- Client service center workers, field engineers, and other technicians supporting critical infrastructure; manufacturers and supply chain vendors that provide hardware, software, and information technology equipment (including microelectronics and semiconductors) for critical infrastructure
- Workers responding to cyber incidents involving critical infrastructure, including those supporting medical facilities; state, local, tribal, and territorial governments and federal facilities; energy and utilities providers; banks and

other financial institutions; and other critical infrastructure categories and personnel

- Workers supporting the provision of essential global, national, and local infrastructure for computing services (including cloud computing services), business infrastructure, web-based services, and critical manufacturing
- Workers supporting communications systems and information technology used by law enforcement, public safety, medical, energy, and other critical industries
- Workers required to support continuity of services, including janitorial and cleaning personnel

Essential critical infrastructure workers are needed to maintain the services and functions that Americans depend on daily and that need to operate resiliently during the COVID-19 emergency response. Essential workers should follow guidance from the Centers for Disease Control and Prevention as well as state and local officials regarding strategies to limit disease spread.

Banks should consider the following steps for employees and contractors operating in, or moving between, restricted areas to facilitate the continued operation of essential services:

- Update business continuity plans to include workforce considerations that address movement restrictions.
- Engage with local law enforcement and other authorities responsible for enforcing stay-at-home and similar orders to identify local requirements and communicate the need for employee travel consistent with the CISA guidance.
- Provide the following documents to employees and contractors so they may have them readily available during travel in restricted areas:
 - Paper copy of CISA's "Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response."
 - Paper copy of the Treasury Department's "Statement by Secretary Steven T. Mnuchin on Essential Financial Services Workers."

- Documentation, on company letterhead, detailing work-related travel and how it aligns with the financial services sector list of essential critical infrastructure workers.
- Company identification card.

While state and local authorities are responsible for enforcing travel restrictions in place during the COVID-19 response, these steps may reduce the burden on employees needing to travel inside restricted areas to support critical infrastructure.

Further Information

Please contact Patrick Kelly, Director for Critical Infrastructure Policy, at (202) 649-6550.

Grovetta N. Gardineer

Senior Deputy Comptroller for Bank Supervision Policy

Related Links

- U.S. Department of Treasury Press Release, "[Statement by Secretary Steven T. Mnuchin on Essential Financial Services Workers](#)"
- CISA "[Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response](#)" (PDF)

¹ The term "banks" refers collectively to national banks, federal savings associations, and federal branches and agencies of foreign banking organizations.

Topic(s): ■ BANK INFORMATION TECHNOLOGY (BIT)

■ BUSINESS CONTINUITY & RESILIENCE - BIT