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# Reopening: Guidance for Business Services (Banks, Notaries, Title Companies, etc.)

Guidance Document

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## Overview

Small and medium (especially non-chain) establishments such as banks, notary offices, title companies etc. have been very challenged during the COVID-19 pandemic. These businesses supply a service which in many cases involves a face-to-face interaction to complete a critical transaction that does not involve the hands-on purchase of tangible goods and services.

Many establishments have been creative in encouraging online transactions, drive-thru services, and the utilization of video tools (e.g., FaceTime, Zoom, and Skype) to provide personal customer service. However, many have been forced to lay off or furlough key staff members, which may complicate re-opening as states start to relax shelter-in-place and stay-at-home restrictions. With such restrictions beginning to lift, these owners are faced with difficult questions that must be addressed before reopening, such as:

- How can we protect our employees and customers from the virus when entering our facility?
- How do we assure our customers that we are doing all we can to protect them from the virus?
- How can we minimize the risk of disease transmission if those that are ill, or those who have had contact with positive COVID-19 people, shop or visit our places of business?
- What do we do if a customer is sick or not following the guidelines?
- How do we deal with customers that request cash, need a signature to complete a transaction, a meeting with a representative, or leave the establishment with official paperwork associated with the customary transaction process?

Measures can be taken to reduce the risk of transmitting COVID-19 from touching surfaces, physical distancing to control from person-to-person spread through respiratory droplets and from providing the customer with paperwork or cash upon completing a transaction. Clear communication of controls being implemented for customer and employee health via social and digital media is critical before these establishments can re-open safely.

Many of these establishments must remain open to accommodate certain financial and legal operations that require in-person contact. For example,

- Opening a new bank account or obtaining a cashier's check or other bank services that cannot be done online.
- Closing on or refinancing a home, purchasing a new vehicle or other legal transactions that may require in-person notary services.
- Preparing wills or other legal matters.
- Receiving financial advice.

## What should an Employer do to protect themselves and their customers?

Owners should continually monitor international (World Health Organization - WHO), federal (CDC), state, and local guidelines for changes in recommendations, cleaning strategies, and other best management practices. Employers should also consider developing a team of professionals to monitor, assess, and implement new strategies as they become available. In addition, employers should consider the following strategies for reducing the risk of COVID-19 transmission in regards to physical distancing, ventilation, enhanced cleaning practices, restrooms, lunch/break areas, shared contact surfaces, personal hygiene, employee wellness,



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personal protective equipment, training, waste and laundering, and communication. Due to the wide variety of these establishments and sizes, it may not be possible for establishments to implement all of the following; however, trying to tackle the problem from multiple angles can help reduce health risks.

### **Physical Distancing**

- Consider all options possible to minimize direct employee/customer interface:
  - Encourage online banking, direct deposits, wire transfers, drive-thru banking, etc. to minimize face-to-face interactions. Fully communicate to customers the services available and how this will help protect them from the potential spread of this virus.
  - Consider additional employee precautions for any in-home visits to customers who may be incapacitated due to age or infirmed due to illness or disease requiring personal services. (Situations where electronic methods are unavailable).
  - Full utilization of ATM's and other electronic mechanisms (NOTE: consider a means to clean and disinfect these devices after each use and to apply a hand sanitizer and/or to wash their hands directly after using these machines).
  - Consider utilizing DocuSign or other online services to finalize legal paperwork versus requiring an in-person signature.
  - Consider utilizing virtual online mechanisms to verify necessary documents and for customer validation.
  - Electronic pre-pay or other means to minimize the need for cash or limit the need for on-site credit card machines or signatures. When on-site credit card machines or signatures are used, have a means to clean and disinfect this equipment and pens after each use.
- Consider early hour services for the elderly or other vulnerable populations, other than the general public.
- Consider physical distancing while at the teller station. Patrons can step back away from the counter while a transaction is being made.
- Use social media and other communications (signage/email/text lists) to educate customers/clients on the steps being taken for their protection.
- Crowd control: mark distances using tape/markers/paint/signage of 6 feet for customers in checkout and indoor and outdoor waiting areas.
  - Video, photos, and markings are ideal to demonstrate distancing measures.
- Request customers to make appointments for lobby access and limit the number of customers in the building at one time, based on the size of your establishment
- When it is necessary for people to enter the establishment, configure the space with appropriate social distancing in mind.
  - Distance counters or transaction locations to 6 feet or more and place markings on the floor showing customers where to stand in line.
  - Consider placing plastic partitions between counters / transaction locations.
  - Place signs at the entrance to inform the customers of the requirements.
- Train staff on physical distancing.
  - Make this a key point at greeting “Hello, thank you for coming in. We are here to help you, but we will be at distance of 6 feet for your safety”.
- For scheduled services (e.g., house / auto closing, setting up a checking account, etc.) have customers sit outside (if possible in their vehicles) until either called or texted to let them know that you are ready for them and that the space has been cleaned and disinfected.



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- Ensure appropriate social distancing between employees and clients at all times during transactions.
- Consider placing Plexiglass partitions between employees and customers.
- When it is necessary to give the customer paperwork to confirm their transaction, consider placing the documents in disinfected plastic covers

### Ventilation

- Ensure ample fresh air to customers and staff and properly utilize the building's ventilation system. Some ways to do this or seek help:
  - Open doors and windows if possible.
  - Maximize fresh air through your ventilation system.
  - Maintain relative humidity at 40-60%.
  - If you don't know how, ask an HVAC professional and see [ASHRAE](#) updates for more information.
- Consider using portable HEPA filtration units.
- If fans, such as pedestal fans or hard mounted fans are used in the store, take steps to minimize air from fans blowing from one person directly at another individual. If fans are disabled or removed, employers should remain aware of, and take steps to prevent [heat hazards](#).

**(NOTE: Contact an occupational health and safety professional or ventilation specialist for advice on how to best utilize ventilation systems).**

### Enhanced Cleaning Practices

- Select appropriate disinfectants – consider effectiveness and safety.
  - The U.S. Environmental Protection Agency (EPA) has developed a list of products that meet EPA's criteria for use against SARS-CoV-2.
  - Review product labels and Safety Data Sheets and follow manufacturer specifications.

- Consider consulting industrial hygiene experts if additional advice is needed.
- Establish a disinfection routine – do not use wet rag approach (use disposable products instead).
  - Ensure disinfection protocols follow product instructions for application and contact time.
  - Contact surfaces, point of purchase, credit card payment station should be disinfected after each customer.
- Promote these practices to customers – provide appropriate signage.
  - Consider using a checklist or audit system to track how often cleaning is conducted.
  - All surfaces where direct customer interaction take place should be visibly cleaned and disinfected on a frequent/regular basis (e.g., bank teller areas, desks where there is a customer interface, etc.).

### Restrooms

- Ensure restrooms are under negative pressure.
- Doors to multi-stall restrooms should be able to be opened and closed without touching handles if at all possible.
  - Place a trash can by the door if the door cannot be opened without touching the handle.
- For single restrooms, provide signage and materials (paper towels and trash cans) for individuals to use without touching the handles. Consider providing a key so disinfection measures can be better controlled. If a key is used, it should be disinfected after each use as well. For facilities with only one restroom and providing services with short transaction times, consider closing off for the time being.
- Place signs indicating that toilet lids (if present) should be closed before flushing.



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- Place signs asking customer and employees to wash hands before and after using the restroom.
- Provide paper towels and air dryers in restrooms.<sup>1</sup>
  - The WHO and CDC currently state that hands can be dried using a paper towel or hand dryer.
  - Due to current uncertainties surrounding the transmission of SARS-CoV-2, care should be taken when using a hand dryer or paper towel.
  - The use of touch or push hand dryers is discouraged due to possible surface contamination. If hand dryers are used, consider touchless devices.
  - Businesses and employers should work with HVAC professionals to ensure that bathrooms are well ventilated.
- Double efforts to keep bathrooms clean and properly disinfected.
- There are a number of examples available for wellness questionnaires (see Resources below).
- Employees should be encouraged to stay home if they are experiencing symptoms of COVID-19. If employee is sick or receives any kind of testing (virus or antibody), results should be reported to employer and timing/decision to go back to work should only be with doctor's approval.

### Other Control Measures

- Although not necessary if hand-washing protocols are rigorously followed, consider providing gloves to staff.
  - If they are worn, they must be changed regularly and are not a substitution for hand-washing.
- Depending on local requirements, for those who cannot maintain physical distancing as part of their job, provide or encourage all employees to wear face coverings and gloves and to use hand sanitizer. **(NOTE: Homemade face coverings primarily protect others not yourself).**

**NOTE: If an employer chooses to provide an N95 respirator, please fully consider all the potential OSHA requirements.**

- Consider splitting bank departments into separate teams to ensure that critical functions can always be handled. Many banks have formulated “A,” “B,” and “C” teams to further facilitate this split. Also, executive management should assess participating in a scheduled rotation.

### Training

- Provide instruction and training to employees on how to:
  - Properly put on and remove gloves.
  - Clean and disinfect surfaces according to product specifications.

### Personal Hygiene

- Establish a “before- and after-service” hand washing or sanitizing for all staff.
- Provide hand washing stations at the front of the establishment or alternatively, hand sanitizer if not feasible.
- Provide hand washing stations or sanitizer at prominent locations and point of interface with customers.

### Employee Wellness

- Conduct employee temperature screening and wellness checks before each shift.
  - Temperature screening can include manual (use non-contact infrared thermometers) or thermal camera methods.
  - Employees can self-check temperature, while wearing a glove, or disinfect between use.

<sup>1</sup>NOTE VERSION CHANGE: In version 1 of this guidance document, in the section titled “Restrooms” it stated to disconnect or tape off the hand dryer.



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- Correctly use face coverings and/or respirators.
- Provide Safety Data Sheets for cleaning chemicals and ensure employees are aware of the hazards of use.
- If advice is needed, industrial hygienists have expertise in selecting Personal Protective Equipment (PPE) and training.

### Waste and Laundering

- Single-use items and used disinfection materials can be treated as regular waste, following regular safety guidelines.
- Any reused cloth materials should be washed and dried on the highest temperature setting allowable for the fabric.

### Communication

- Communicate to customers what the establishment is doing to mitigate the spread of COVID-19. (e.g., disinfection routine, health policies for staff, and health & safety measures in place).
- Consider communicating to customers that in-person interactions may not be a good option and alternative methods that they can use to complete their transactions (e.g. taking care of someone who is COVID-19 positive, exhibiting symptoms of COVID-19, being in a high-risk category, etc.).
- Communicate that the establishment has the right to refuse service to anyone exhibiting symptoms or not following guidelines (e.g., physical distancing).
- Platforms for communication could include websites and indoor/outdoor signage.

### What should an Employee do to protect themselves and the customer

- Evaluate your health constantly and if you are sick stay home. If you have a temperature stay home. If someone at home is sick, stay home. If you have allergies and sneezing, stay home. **NOTE: Employ-**

### er HR Policies, HIPAA guidelines and other laws should be followed at all times.

- If a customer is visibly ill, either ask them to leave or escort them to a private room to address their business concerns. Such rooms should be cleaned and disinfected after each use.
- Wear a face covering when out in public areas and maintain physical distancing.
- Wash your hands when you arrive at work, after each customer, after touching your face or face covering and when you leave work.
- At all times, wear a face covering or something better if you have it.
- Let your employer know if you have concerns about the PPE that may be provided to you and that you are properly instructed on how to use it.
- Attempt to delay the urge to sneeze or cough if possible; carry a disposable towel or handkerchief towel, so if you get the urge to sneeze or cough, cover your nose, mouth and mask with it and then, attempt to delay the urge to sneeze or cough, immediately leave the premises to wash your hands and face thoroughly before returning to work.

**NOTE: If an employer chooses to provide an N95 respirator, please fully consider all the potential OSHA requirements.**

### What can a Customer do to minimize the transmission of Covid-19?

- If you are sick stay home. If you have a temperature stay home. If someone in your house is sick, stay home. If you have allergies and can't control sneezing, stay home.
- Use online and electronic services as much as possible.
- Wear a face covering as you enter and leave the building.



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- Wash your hands before and after you leave the building if possible, especially when touching ATM's, credit card machines etc. If not, use hand sanitizer when you enter and before you leave the building.
  - Maintain a distance of at least 6 feet from other customers and employees when walking throughout the office/store to the extent possible.
  - If you get the urge to sneeze or cough, put on your mask, cover your nose, mouth, and mask with a napkin or handkerchief, attempt to delay the urge to sneeze or cough, immediately leave the building, wash your hands and face thoroughly before returning.
- [Consumer Bankers Association COVID-19 Resource Hub](#)
  - [Independent Community Bankers of America Guide](#)
  - [National Notary Association COVID-19 Bulletin](#)
  - [American Society of Notaries - Procedures During COVID-19 Pandemic](#)
  - Numerous **wellness questionnaire examples** are available online (e.g., [South Dakota Department of Health's COVID-19: Employee Screening Questions and Guidelines](#))
  - The EPA has developed a [list of disinfectants](#) for use against SARS-CoV-2:
  - ASHRAE has a list of [COVID resources](#) for commercial buildings.
  - AIHA's Indoor Environmental Quality Committee developed these guidance documents about reopening and cleaning buildings after closures due to COVID-19: [Recovering from COVID-19 Building Closures](#) and [Workplace Cleaning for COVID-19](#)

## Resources

- [American Bankers Association COVID Guidance](#)
- [American Land Title Association COVID Guidance](#)
- [National Association of Tax Professionals COVID Guidance \(Business Continuity Tips\)](#)
- [Mortgage Bankers of Association COVID-19 Business Continuity Resources](#)



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## About Occupational Health and Safety Professionals

Occupational health and safety (OHS) professionals (also known as industrial hygienists) practice

the science of anticipating, recognizing, evaluating, and controlling workplace conditions that may cause workers' injury or illness. Through a continuous improvement cycle of planning, doing, checking and acting, OHS professionals make sure workplaces are healthy and safe.

## Get additional resources at AIHA's Coronavirus Outbreak Resource Center.

Find a qualified industrial hygiene and OEHS professionals near you in our [Consultants Listing](#).

### Disclaimer

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These guidance documents were primarily developed for those smaller business that don't have readily available occupational health and safety resources, and designed to help business owners, employers, employees and consumers implement science-backed procedures for limiting the spread of the coronavirus. They are subject to any local, state, or federal directives, laws, or orders about operating a business and should only be used if they do not conflict with any such orders.

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