INDUSTRY NOTICE 2020-04
Date: March 23, 2020

Treasury Memo Designates Financial Services Sector Essential Critical Infrastructure Workers

To: Chief Executive Officers and Presidents

On Sunday, March 22, 2020, the U.S. Treasury Department issued a memo stating that the financial services sector is identified as a Critical Infrastructure Sector by the Department of Homeland Security (DHS). The memo refers to guidance issued by DHS Cybersecurity and Infrastructure Security Agency (CISA) on Thursday, March 19, 2020, that listed essential workers for 16 critical industries. Hopefully, this should provide you some clarity as you work to provide service to your customers.

Per the DHS guidance, critical financial services workers are:

- 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 ATMs, 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.

Earlier this month, you were provided with the ability and flexibility to modify or close your bank office/branch operations in response to the Coronavirus pandemic and we appreciate you notifying our offices of the changes in operations you have made to safeguard staff, customer, and your services. We continue to collect the Emergency Notification forms from each of you and are monitoring operations throughout your communities and state.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your continued cooperation.

Charles G. Cooper
Banking Commissioner