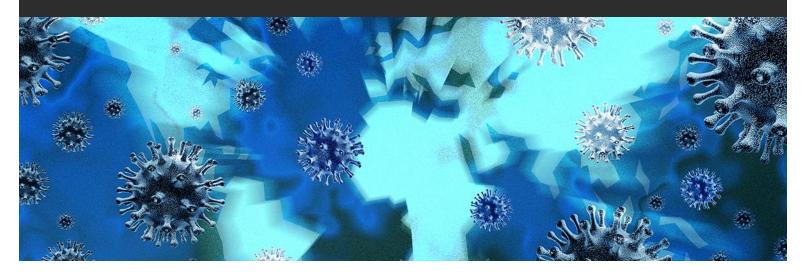


Alert | Health Emergency Preparedness Task Force: Coronavirus Disease 2019



March 2020

Treasury Department Issues Documentation for Essential Financial Services Employees

Firms Should Consider Providing Essential Staff with Similar Letters on Company Letterhead

Financial Services is a Critical Infrastructure Sector as defined by the Department of Homeland Security (DHS). Workers in Critical Infrastructure Sectors have a special responsibility to maintain their normal work schedule. As an increasing number of state and local governments implement shelter-in-place orders to combat the spread of COVID-19, it is unclear in many of these jurisdictions what documentation local police may ask a worker for, if stopped, to show the worker is "essential." On March 22, 2020, the Treasury issued a memorandum that essential financial services sector employees can carry, along with other appropriate documentation, to demonstrate they are "essential" and therefore must report to work.

The Treasury Department's Financial Services Sector Essential Critical Infrastructure Workers

Memorandum ("Memorandum") identifies categories of workers who are considered part of the Essential

Critical Infrastructure Workforce for the financial services sector as follows:

 Workers who are needed to process and maintain systems for processing financial transactions and services, such as payment, clearing and settlement services, wholesale funding, insurance services and capital market activities;



- Workers who are needed to provide consumer access to banking and lending services, including ATMs, movement of currency (e.g., armored cash carriers); and
- Workers who are needed to support financial operations, such as those staffing data and security operations centers.

Also included in the Treasury Department Memorandum as Essential Critical Infrastructure Workers are "key third-party providers who deliver core services." These essential worker categories are consistent with the initial list of Essential Critical Infrastructure Workers developed by the Cybersecurity and Infrastructure Security Agency (CISA). The CISA list is advisory in nature and should not be considered a federal directive or standard in and of itself.

Major financial services trade associations such as the Securities Industry and Financial Markets Association (SIFMA) and the American Bankers Association (ABA) have recommended essential staff who may be traveling to critical facilities when shelter-in-place directives are in force carry on their person the following: (1) a hard copy of the Treasury Department Memorandum, (2) a government-issued ID, and (3) a letter provided by their employer, on company letterhead.

For more information and updates on the developing COVID-19 situation, visit GT's Health Emergency Preparedness Task Force: Coronavirus Disease 2019.

Author

This GT Alert was prepared by:

• Tracy L. Gerber | +1 561.650.7985 | GerberT@gtlaw.com

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