



## **Office Reopenings and Mask Requirements - Oregon: Guidelines for Financial Institutions** **August 17, 2020**

As Oregon continues the ever-changing process of reopening businesses and updating mask requirements, it is important for financial institutions to know the most recent updates.

As of August 18, 2020, all of Oregon is in Phase 2 of the Governor's reopening plan except for Multnomah, Washington, and Clackamas Counties (who have never moved beyond Phase I), Lincoln County (moved back to Phase I), Malheur and Morrow County (moved back to Phase I) and Umatilla County (moved back to Baseline).

Office Work: With respect to purely administrative offices that are not open to the public, financial institution offices located in counties who are in Baseline or Phase I must allow telework "to the maximum extent possible." Offices located in counties in Phase 2 may allow "expanded office work." The Governor has still not released any specific guidance on what "expanded office work" means, but it appears to allow more in-office work, but not back to pre-COVID levels. Offices who have expanded office work must maintain physical distancing at all times, and remote work is still strongly encouraged whenever possible.

Originally, it was unclear what mask requirements applied with respect to private offices not open to the public. However, on August 13, 2020, the Governor issued additional mask and face covering guidance which specifically addresses "public and private office spaces." It states that:

"Masks, face coverings or face shields are required at all times for employees in public and private office spaces, including hallways, bathrooms, elevators, lobbies, break rooms, and other common spaces, unless employees are at individual work spaces or in meeting rooms where six (6) feet of distance from other people can be consistently maintained."

The new mask guidance can be found [here](#).

Thus, financial institution offices must require employees and visitors alike to wear masks or face coverings at all times **unless** the employees are at individual work spaces where they are 6 feet from other people. A simple rule to follow, assuming that workspaces are 6 feet apart, is that masks must be worn at all times unless the employee is at their desk. If workspaces are not 6 feet apart, then financial institutions must require that their employees wear masks at all times. All financial institutions must have an officer responsible for enforcing social distancing and mask policy, and a written social distancing policy.

Branches. Financial institution branches have been able to be open statewide since May 15, 2020. Under the Governor's plan, retail businesses, including financial institution branches, must implement specific safety measures. They must limit the number of customers in the premises and focus on maintaining at least six feet of distance between customers and employees, post clear signs listing COVID-19 symptoms (available on the state's website) and asking people to stay home if they are sick and frequently clean commonly touched surfaces and high traffic areas. Retail businesses are also encouraged to place clear plastic or glass barriers in front of customer service counters, encourage one-way flow, and use signs and tape to help customers maintain physical distancing.



Financial institutions must require all employees in branches to wear a mask, face covering or face shield, which must be provided by the employer, unless they are in private office space and maintain 6 feet of distance from other people. Employees can be permitted to wear their own masks, but employers must provide them with masks if they don't have their own. The specific retail requirements can be found here (updated as of July 1, 2020). All financial institutions should review and implement these guidelines in their branches.

The new mask guidance linked above also makes clear that all persons in control of an indoor public space, such as a branch, must also require all customers and visitors to wear a mask. Branches must post clear signage about mask requirements. Accommodations must be made for individuals with disabilities. The guidance also encourages those in control of indoor public spaces to provide face coverings for customers at no cost, and educate employees on how to safely work and communicate with people who cannot wear face masks. Finally, children under the age of two are not required to wear a face mask, children between the ages of two and five are encouraged to wear a face mask and children five and older must wear a face mask.

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