

[Banking and Finance Law Daily Wrap Up, FINANCIAL STABILITY— Guidance identifies financial services workers as essential ‘critical infrastructure’ workers, \(Mar. 26, 2020\)](#)

Banking and Finance Law Daily Wrap Up

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The Department of Homeland Security guidance details who those workers are and how they can access their workplace to support critical infrastructure.

The Federal Deposit Insurance Corporation has [notified](#) institutions it supervises that the Department of Homeland Security’s Cybersecurity and Infrastructure Security Agency (CISA) has issued [guidance](#) identifying financial services sector workers as essential "critical infrastructure" workers during the COVID-19 response emergency. According to the FDIC, the guidance identifying essential critical infrastructure workers is intended to support state, local, and industry partners in identifying the critical infrastructure sectors and the essential workers needed to maintain the services and functions to operate without interruption.

As state and local communities consider COVID-19-related restrictions, CISA is offering this list to assist prioritizing activities related to continuity of operations and incident response, including the appropriate movement of critical infrastructure workers within and between jurisdictions. A letter from company leadership explaining that the identified worker carrying the letter is a critical infrastructure worker who needs to be allowed access to their place of work and the attached documents may assist essential critical infrastructure workers needing to travel inside restricted areas in order to support the critical infrastructure.

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); and
- workers who support financial operations, such as those staffing data and security operations centers.

The Office of the Comptroller of the Currency has also issued a [bulletin](#) on CISA’s guidance in which it noted that Treasury Secretary Steven Mnuchin recently issued a statement emphasizing the importance of the financial services sector and reinforcing the CISA guidance.

Mnuchin [said](#) he strongly supports "the Department of Homeland Security’s recent guidance identifying financial services sector workers as essential critical infrastructure workers during the COVID-19 response emergency." He added that, consistent with President Donald Trump’s guidelines, workers in critical infrastructure sectors have a special responsibility to maintain their normal work schedules.

According to Mnuchin, "The Essential Critical Infrastructure Workforce for the financial services sector includes 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 markets activities."

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