



**MONTANA
DEPARTMENT OF
ADMINISTRATION**

Division of Banking & Financial Institutions

Steve Bullock, Governor
John Lewis, Director
Melanie Hall, Commissioner

To: Montana State-Chartered Banks

From: Melanie Hall, Commissioner

Subject: Supervisory Memorandum on Operations During Novel Coronavirus Situation

Date: March 19, 2020

**SUPERVISORY MEMORANDUM ON OPERATIONS
DURING NOVEL CORONAVIRUS SITUATION**

The Division is trying to minimize the amount of regulatory burden placed on financial institutions as we navigate through these difficult times. Below is information regarding preferred methods of communication as well as notification requirements for branch and LPO closures and hours changes during this time. Please note that even if a notification is not required, financial institutions are welcome to provide updates to the Division if desired.

COMMUNICATION WITH THE DIVISION

The Division has mandated telework for office staff. Staff will not be onsite to receive or process incoming mail. Please send written correspondence as directed below. If you have any questions on how to send documents electronically or use the File Transfer Service, please contact our office at 406-841-2920. Calling our office, even during this period of mandated telework for the Division, will connect you with an administrative professional who will connect you with appropriate personnel.

Email: Written communication can be sent to the Division by email at banking@mt.gov. Division staff monitor this email account and will forward to the appropriate employees.

File Transfer Service: Communication that is confidential in nature or consists of large-size documents can be sent to banking@mt.gov through Montana's secure File Transfer Service at www.transfer.mt.gov. Instructions on how to create

an account and use the system are available on our website at https://banking.mt.gov/Portals/58/Banks/FTS_Instructions.pdf?ver=2020-03-18-160728-760.

Contact Information: Division employee contact information is available on our website at <https://banking.mt.gov/Home/Contact>. To send an email, click on the employee's name. Calls placed to work phone numbers are being routed to employee's cell phone.

FREQUENTY ASKED QUESTIONS REGARDING BRANCH CLOSURES

The Division is committed to working with institutions so they can continue to provide essential services to their customers, while also taking reasonable steps to promote social distancing. Included below are several scenarios that we have been receiving questions about. The term “essential services” includes, but is not limited to, accepting deposits, providing access to cash and existing customer accounts, and drawing on existing loans.

We are closing the lobby of our branch but will continue to provide services through our drive-through. Do we need to notify the Division?

No, the Division does not need to be notified of lobby closures during this time as long as you are continuing to provide essential services via the drive-through or other means.

We are closing the lobby and drive-through of our branch but will continue to provide services through our mobile banking app and our ATM. Do we need to notify the Division?

No, the Division does not need to be notified of lobby and drive-through closures during this time as long as you can continue to provide essential services via the mobile banking app, an ATM, or other means. If you are not able to provide essential services, you should submit an Emergency Branch Closure form to the Division (see below).

We are closing the lobby and drive-through of our branch and sending our employees home. We do not have a mobile banking app but will continue to maintain our ATM. Do we need to notify the Division?

Potentially, yes. If the ATM is the only access customers have, and you are not able to provide essential services to your customers via the ATM, you should submit an Emergency Branch Closure form to the Division (see below).

We are closing the lobby and drive-through of our branch and sending our employees home. We do not have a mobile banking app, will not be maintaining our ATMs, but will continue to offer services through the telephone. Do we need to notify the Division?

Potentially, yes. If the bank can continue to provide essential services through telephone communication, then you do not need to notify the Division. If you are not able to provide essential services to your customers, you should submit an Emergency Branch Closure form to the Division (see below).

We are closing the lobby and drive-through of our branch and sending our employees home. We do not have a mobile banking app, will not be maintaining our ATMs, but will continue to offer services through our website. Do we need to notify the Division?

Potentially. If the bank can continue to provide essential services to all customers using the website, you do not need to notify the Division. If you are not able to provide essential services to your customers, you should submit an Emergency Branch Closure form to the Division (see below).

We are closing the lobby and drive-through of all of our branches in Anytown, Montana and sending our employees home. We do not have a mobile banking app and will not be maintaining our ATMs in Anytown. Do we need to notify the Division?

Yes. If the bank is unable to provide any level of service to its customers in a given community, you should submit an Emergency Branch Closure form to the Division (see below).

*Please see below exception if an operational branch is nearby.

Emergency Branch Closure Form

If possible, please complete an [Emergency Branch Closure](#) form and submit to the Division. Please download the form to your computer, enter the requested information, and click the submit button at the bottom. In lieu of submitting the form, send an email to banking@mt.gov with the following information:

- Bank name
- Branch address
- Date of branch closure
- Time of branch closure
- Reason for closure
- Name of contact person
- Phone number
- Email address

Exception:

We are closing the lobby and drive-through of one of our branches in Anytown and sending our employees home. We do not have a mobile banking app and will not be maintaining our ATM at that branch. However, we are directing customers to a nearby branch in Anytown that is providing the essential services. Do we need to notify the Division?

No, the Division does not need to be notified of a branch closure if another branch close by serving the same community is providing essential services.

FREQUENTLY ASKED QUESTIONS REGARDING CHANGE IN HOURS

We are closing the lobby portion of our branch but leaving the drive-through open during regular hours. Do we need to notify the Division?

No, the Division does not need to be notified since the location is still providing essential services during regular hours. *We closed the lobby portion of our branch but due to staffing shortages, we can no longer keep the drive-through open during regular hours. Do we need to notify the Division?*

Yes, the Division needs to be notified since the location is no longer able to provide essential services during regular hours. You will need to post a notice of the new hours at the branch to notify your customers and send a copy of the notice to the Division. See Mont. Code Ann. 32-1-484.

Notification can be provided to the Division via email to banking@mt.gov with the following information:

- Bank name
- Branch address
- Effective date of change in hours
- Reason for change in hours
- Name of contact person, phone number, and email address
- Attach copy of customer notification

FREQUENTY ASKED QUESTIONS REGARDING LOAN PRODUCTION OFFICES

We are closing our loan production office (LPO). Do we need to notify the Division?

Since loan production offices (LPOs) are not a branch, the Division does not need to be notified if an LPO is closed.