March 12, 2020

To the Presidents and/or CEOs of All State-Chartered Banks:

The FFIEC has encouraged banks to review their pandemic policies in preparation for possible disruptions caused by the Coronavirus. In addition to FFIEC communications, I know banks are being inundated with information about the Coronavirus right now, so I will not attempt to duplicate information you have received from other sources beyond reminding you to take appropriate steps to prepare for the possibility the virus affects your bank and/or communities. We are continuing to monitor the situation at the Iowa Division of Banking (IDOB) and are participating in the Government’s overall response to the situation.

If your bank encounters significant issues relating to the Coronavirus outbreak, please let the IDOB know by contacting the analyst assigned to your bank via email or by calling (515) 281-4014. Also keep your federal regulator informed. You may also submit information to us using the IDOB’s website at https://www.idob.state.ia.us/public/contactInfo/.

In emergency situations, we often get questions from banks about what they need to do if they need to temporarily close or relocate a bank office. Answers are outlined below.

**Closing a Bank Office**
State banks are not required to get permission from the IDOB if they are going to temporarily close a branch office. However, we request banks notify us if they temporarily close a branch due to the Coronavirus so we can keep track of branch closures and help us identify areas where consumer cash or banking needs may be challenged. We request banks also notify the IDOB when they reopen the office.

**Relocating a Bank Office**
Iowa law also allows the IDOB to authorize banks to operate in alternative locations in the event of an emergency. If your bank needs to operate out of a different location as a result of the Coronavirus situation, please contact your bank’s analyst so we can ensure you have the proper authorization to do so.

Again, for both situations, please also keep your federal regulator informed and understand that they may have different notification requirements.

If you have an upcoming exam, we will be in touch with you, but feel free to call us with questions. We will provide more information as appropriate.

Sincerely,

Jeff Plagge
Superintendent of Banking