

# VIRGINIA BANKERS ASSOCIATION

Bruce T. Whitehurst  
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September 25, 2020

**Via: townhall.virginia.gov**

Princy Doss  
Director of Policy, Planning  
600 E. Main Street, Ste. 207  
Richmond, Virginia 23219

**Re: Department of Labor and Industry Proposed Permanent Standard for Infectious Disease Prevention: SARS-CoV-2 Virus That Causes COVID-19, 16VAC25-220**

Dear Ms. Doss:

The Virginia Bankers Association (“VBA”) represents banks of all sizes and charters and has served as the organized voice for Virginia’s \$615 billion banking industry and its 42 thousand employees since 1893. We appreciate the opportunity to comment on the Department of Labor and Industry’s notice of its intent to adopt a permanent standard for Infectious Disease Prevention: SARS-CoV-2 Virus That Causes COVID-19.

The VBA opposes the adoption of the permanent standard. Virginia banks have remained open throughout the coronavirus pandemic providing important banking and financial services to their customers and communities. Protecting the health and safety of bank customers and employees has been, and continues to be, of paramount importance and a priority for our members. Virginia banks have invested significant time and resources altering their processes and service delivery models to ensure those protections, as well as complying with federal and state governmental requirements and best practices.

The permanent standard, as proposed, lacks: necessary clarity; flexibility to adapt to the continued change in the understanding of the virus; consistency with changing federal guidance; and, an appreciation of specific industry circumstances. Further, a permanent standard for a temporary threat is illogical and unnecessary; therefore, the regulation should not extend beyond the expiration of the Governor’s State of Emergency related to COVID-19. The burden to comply with the proposed permanent standards along with the potential risks in significant enforcement fines and litigation only further harm both Virginia banks and their small business customers during this already perilous economic time. In addition to these concerns, the VBA supports the comments and concerns that the Virginia Chamber has submitted in regard to any potential permanent standard to be adopted by the Safety and Health Codes Board.

In summary, the VBA opposes the adoption of the permanent standard. Thank you for the opportunity to provide comments. If you have any questions, please feel free to contact me at 804-819-4701 or [bwhitehurst@vabankers.org](mailto:bwhitehurst@vabankers.org).

Sincerely,

A handwritten signature in blue ink that reads "Bruce T. Whitehurst". The signature is written in a cursive style with a prominent initial "B".

Bruce T. Whitehurst  
President & CEO