



Governor Jay Inslee  
Office of the Governor  
PO Box 40002  
Olympia, WA 98504-0002

**Re: Essential Business Operations During COVID-19**

Dear Governor Inslee:

We are writing on behalf of the member companies of the Washington Mortgage Bankers Association (WMBA). The words, “these are unprecedented times” reverberate in the halls of all of our organizations and businesses. We recognize that your administration has had to make impossibly hard decisions. We also understand that the hardest decisions may be yet to come. The purpose of this letter is to highlight the essential functions of the mortgage banking industry should additional constraints on movement or gathering of people, become warranted.

Should additional constraints become necessary we would urge the State of Washington to adopt policies consistent with the Department of Treasury (WA, D.C.), Financial Service Sector Essential Critical Infrastructure Workers dated March 22, 2020 and *Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response* dated March 19, 2020. (see attached)

The national guidance specifically identifies, **“The Essential Critical 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; to provide consumer access to banking and lending services, including ATMs, movement of currency, support financial operations, such as those staffing data and security operations centers; and key third party providers who deliver core services. These individuals are critical to maintaining safe and efficient financial services and ensuring citizens have access to these services that are necessary to conduct their daily lives.”** as part of the Essential Critical Infrastructure Workforce.

WMBA is a trade association representing the banks and mortgage banking companies that, together, support both consumers and the financial system in the state of Washington. The WMBA is proud to help represent this critically important consumer supporting industry. Financing housing is essential to our state and local economy; from real estate excise tax to consumer spending. This industry is well equipped to both provide social distancing solutions when in-person transactions are required and to work remotely while simultaneously sheltering in place.



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Washington's mortgage banking sector has the opportunity to recover from the decade long black eye of the last financial recession. Interest rates for home finance are even lower than the great depression of the 1930's.

We respectfully request that you recognize the critical role the mortgage banking industry plays supporting Washington's ongoing response with a **clear exclusion** in any additional protective measures that are needed – consistent with the March 19 memorandum issued by CISA.

Thank you,

Robert Lipston  
President  
Washington Mortgage Bankers Association



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C.

March 22, 2020

**MEMORANDUM FOR FINANCIAL SERVICES SECTOR**

**FROM:** Secretary Steven T. Mnuchin *Steven T. Mnuchin*

**SUBJECT:** Financial Services Sector Essential Critical Infrastructure Workers

The financial services sector is identified as Critical Infrastructure Sector by the Department of Homeland Security (DHS). The attached DHS guidance, dated, March 19, 2020, identifies the essential critical infrastructure workers during the COVID-19 response emergency, and provides guidance to State and local officials as they work to protect their communities while ensuring continuity of critical functions to public health and safety, as well as economic and national security.

Consistent with the President's guidelines, *"if you work in a critical infrastructure sector, as defined by the Department of Homeland Security, you have a special responsibility to maintain your normal work schedule."* 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; to provide consumer access to banking and lending services, including ATMs, movement of currency (e.g. armored cash carriers); support financial operations, such as those staffing data and security operations centers; and, key third party providers who deliver core services. These individuals are critical to maintaining safe and efficient financial services and ensuring citizens have access to these services that are necessary to conduct their daily lives.

Companies aligned to the essential critical infrastructure worker definition are expected to maintain their operations and work schedules. Everyone should follow guidance from the Centers for Disease Control and Prevention as well as State and local officials regarding strategies to limit disease spread. We are dedicated to working closely with all of you to ensure the safety of the workforce and ensure the continued operations of the financial services sector in support of our Nation's economy.