

BUSINESS CONTINUITY PLAN (BCP) FOR FAMILY FIRST CREDIT UNION

CREDIT UNION EXECUTIVE AND ORGANIZATION-WIDE PLAN

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In partnership with:



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BUSINESS CONTINUITY PLAN OVERVIEW

Family First Credit Union recognizes that a significant threat exists in its ability to continue normal business operations following a serious, unexpected and/or disruptive incident. The Credit Union has a high level of dependency upon its automated systems and processes and this creates various risks that need to be identified and addressed. The Credit Union further recognizes that it needs to recover from disruptive incidents in the minimum possible time and that this necessity to ensure a speedy restoration of services requires a significant level of advance planning and preparation.

This Business Continuity Plan (BCP) has been prepared to assist the Credit Union in managing a serious disruptive crisis in a controlled and structured manner. It contains information on emergency contact details, strategies to mitigate impact, procedures to be implemented, and communication processes to be followed in response to a serious disruptive event.

Family First Credit Union's Board of Directors expects and requires that an on-going, process-oriented approach to business continuity planning that adequately satisfies all regulatory requirements and standard good business practices be in place at the Credit Union. This process to be followed and employed includes a Business Impact Analysis (BIA), Risk Assessment, Risk Management, and Risk Monitoring, Testing and Exercises. This process will also include the Credit Union's business continuity strategy which is to recover, resume, and maintain all critical business functions to service members and the Credit Union community.

PLAN METHODOLOGY

Methodology Followed to Create Plan

Family First Credit Union utilized CastleGarde's five-step methodology to obtain the information required to construct the plan document presented in this document. Those steps, along with summaries of key sub-tasks within each step are detailed below:

1. Data Gathering

- a. Stage 1: The CastleGarde Development Team works directly with departmental management teams across the organization. Face-to-face or phone interviews were performed to determine the critical people, procedures, processes, technologies, and other tools required to perform their duties. Special attention is paid to any process that has an impact on the Credit Union's membership to include product/service delivery, communicating with staff, membership and key vendors, and technology implemented to provide efficiencies in member service. Interdependencies between items are also established to help guide a smooth path to operational restoration while providing communication and services (in a limited capacity) to membership.
- b. Stage 2: Family First Credit Union business process owners provide documentation to substantiate topics discussed during Stage 1 interviews. Examples include Service Level Agreements (SLA), employee/ vendor details, costs for absence/failure to provide critical functions and processes to membership, locations of critical documents, data, and records, required to restore critical business functions and to assist in member service during the interim.

2. Risks/Threats Identification to the Business

- a. Threat Identification – Malicious, Natural Events, Pandemic Events, Regulatory non-compliance, Technological Events, and emerging (unknown potential risks).
- b. Threat Sources – Events or triggers that precede a formal declaration of disaster. Hurricanes, Fraud or Theft, Pandemic Events, and System Failures.
- c. Threat Action – The occurrence of the actual act or event that triggers the need to potentially activate the Business Continuity Plan.
- d. Mitigating Factors – The existence of resilience planning, controls, equipment, and structure to help prevent or mitigate the impact of an event to the Credit Union.
- e. Determine Impact – Based on all previous factors, the CastleGarde Development Team determines the mitigating control factors currently in place against an event's probability of occurrence, the approximate costs that would be incurred if the event arose, and most importantly, impact to membership upon and immediately following the occurrence of an act or event.

3. Develop the Critical Prioritization Matrix (CPM)

CastleGarde considers and reviews all data gathered to create its proprietary CPM document. This document is a pre-cursor to the creation of the Business Impact Analysis (BIA) and is specifically designed to measure impact to membership should acts occur that render Family First Credit Union unable to provide member service at 'normal operating levels'. The Credit Union's CastleGarde Development Team reviewed this document with the Board of Directors and management, and subsequently approved the CPM document. The approved document is used to develop the BIA, ensuring consideration has been given to the absence of critical facilities / people / processes / systems and ensuring manual operating procedures are available or created to provide recovery instructions based on the absence of critical resources.

4. Create the Business Impact Analysis (BIA) – See BIA section of this plan. CastleGarde and Family First Credit Union co-developed the Credit Union's Business Impact Analysis. The BIA provides the "order of recovery operations", incorporating costs to the organization, impact to membership, and the potential possibility of such a disruptive occurrence. Inclusive, this database are calculations for Maximum Acceptable Losses, Recovery Point Objectives, Recovery Time Objectives, Maximum Tolerable Downtimes, Instructions and Authority over each process and instructions for alternate processing (workarounds) to service members in the absence of normal operating conditions. Upon approval by Executive Management and/or the Board of Directors of the BIA, the BCP is written and periodically updated to account for changes in the operating environment.

5. Create and Update the written Business Continuity Plan

The creation and updating of the plan consist of 2 main components; Business Resumption and Disaster Recovery. The plan takes all previously calculated and gathered data along with references to the Credit Union's existing procedures, Service Level Agreements (SLA) and 3rd Party Vendor Oversight program and other instructional and reference documents to provide a single framework to orchestrate the recovery of impacted processes/services while being able to provide basic member services until processes/services are recovered to what is considered normal operations. Finally, the Board of Directors and/or Executive Management of the Credit Union review the document (and subsequent plan testing and exercise results) **annually** to ensure Family First Credit Union remains a viable entity for its membership.

PLAN PURPOSE AND OBJECTIVES

This Business Continuity Plan (BCP) has been prepared to provide Family First Credit Union with information, procedures and operational outlines for handling disasters and the recovery or resumption of Credit Union services to members. Should a disaster occur, the information and suggested procedures presented in the plan can be used as presented or can be supplemented or modified as deemed necessary. The plan should also be modified in response to exercise or testing results. This is a living plan. The plan will enable Credit Union personnel to take necessary and positive actions in order to minimize the effects of the disaster/services disruption and to recover lost data and operating systems as quickly as possible. Any incident that interrupts the normal daily operation of the Credit Union will be deemed a disaster. The ultimate objectives of this plan are:

- To ensure the safety of Credit Union employees and any members present during an emergency;
- To identify vulnerabilities, assess impact of disruption, and define time periods in which recovery must occur;
- Identification of financial and indirect (opportunity) costs of outages;
- Identify records, equipment, and contacts vital to recovery of operations;
- Raise staff awareness of the BCP within the organization;
- To build an action plan that allows the Credit Union to resume/recover from an act or event that impacts business units, branches, systems, business processes;
- To limit interruptions in services provided to credit union membership.

The plan can stay viable through various means including the following:

- All Credit Union personnel will be trained to respond quickly and effectively to any disaster so as to minimize dangers to themselves as well as any members present at the Credit Union when a disaster occurs;
- Periodic testing and exercises will be conducted, as prescribed by NCUA guidelines, to ensure that procedures are current;
- The Management Team or the Board of Directors will review exercise and testing procedures and updates and record approval within the board minutes;
- The designated employee responsible for the planning, exercises and testing will update procedures needing modification on an ongoing basis. At least once a year the plan will be updated and reissued to all necessary parties, with a copy given to the board for the board minutes;
- Failures or shortcomings revealed in testing or exercises are evaluated and new strategies or mitigations are developed as needed to ensure the organization's resiliency for future tests and exercises or real contingency events.

OBJECTIVES

Contingency planning, incident response and disaster recovery policies and procedures are designed to achieve the following objectives:

- Comply with regulatory requirements;
- Ensure the safety of personnel and members;
- Reduce legal liability;
- Minimize potential economic loss and exposure;
- Protect assets;
- Reduce disruption to normal operations;
- Ensure an orderly recovery through detailed documentation and organizational stability;
- Minimize insurance premiums;
- Respond to a disaster occurrence;
- Notify necessary personnel;
- Assemble disaster recovery teams;
- Recover data;
- Serve membership in the absence of normal operating conditions;
- Resume processing to ensure minimal disruption to the Credit Union's operations.

The plan includes documented procedures which, if followed, will assist in ensuring the availability of critical resources and in maintaining the continuity of operations during an emergency situation. The plan should aid in ensuring organizational stability through an orderly recovery process in the event of significant problems and interruptions. The plan is not intended to be a procedures manual of how to perform all departmental functions. It includes only those high-priority tasks required to ensure successful recovery from a disaster.

RESPONSIBILITIES

MANAGEMENT TEAM AND DIRECTOR RESPONSIBILITIES

The Management Team and the Board of Directors have the legal and fiduciary responsibility for protecting this Credit Union and its assets. In accordance with all aspects of the regulations, including service bureau interaction, Management and/or the Board have the responsibility and oversight for developing, implementing, exercising, testing, and updating annually the contingency planning, incident response and disaster recovery policies and procedures.

ULTIMATE RESPONSIBILITY FOR SUPERVISION

The Board of Directors has ultimate responsibility for the supervision of Management and the Credit Union's activities. This responsibility cannot be delegated to a correspondent financial institution, an outside consultant, or any other entity.

SCOPE & PLAN ASSUMPTIONS:

- The main branch and operations center of the Credit Union, located at 3604 Atlanta Ave., Hapeville, GA 30354 is either physically inaccessible or has been damaged to the point that operational support cannot be provided from this location;
- The backup data center in Roswell Office / Fiserv CUNify is online and unaffected;
- A majority of staff and critical vendors are available to perform and management is available to direct critical processing, recovery, and restoration activities defined within the plan;
- The alternate location is Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076 for relocated, essential staff if the main office is unavailable. It is assumed for most disasters this location has power, HVAC, hardware and office space for relocated staff (hardware might need to be ordered and rebuilt within Recovery Time Objectives). Certain situations where this assumption may not be true will be addressed later in the plan;
- Communication to staff can be made through various channels in a timely manner;
- Infrastructure is intact or being rebuilt within Recovery Time Objectives for branch access to internet, phones, email, and Fiserv CUNify Core System for relocated staff;
- The alternate command center sites have medical supplies on hand for [Pandemic](#) or other illness.

IMPORTANT NOTE:

It is not the purpose of this plan to specify how job tasks are to be performed in a disaster situation. Rather it is a guide for the organization and for the functional areas of the Credit Union on how to proceed in a disaster. The actual procedures can be found in the specific manuals /operating procedures in each of the functional areas. It is the responsibility of the appropriate supervisor/manager to prepare those functional procedures, maintain them current, develop off line procedures for high priority tasks, and train employees in the performance of those procedures. It is the responsibility of each manager to provide a copy of all procedures / instructions / guidance, etc., developed as an augmentation / supplementation, to the CEO.

BOARD & MANAGEMENT OVERSIGHT

INITIATING THE BCP PROJECT

The Business Continuity Plan (BCP) is regarded as a high priority in the support services development cycle. The preparation of this BCP has been accorded full development project status and a senior manager has been assigned specific responsibilities to oversee the BCP project.

The Development of the BCP is assigned to: VP of Compliance of Family First Credit Union, with assistance from CastleGarde, Inc. who will be responsible for developing, coordinating, and writing the formal Business Continuity Plan (BCP). These individuals are responsible for obtaining the necessary/required information to complete the BCP.

The Implementation of the BCP is assigned to: VP of Compliance of Family First Credit Union who will be responsible for ensuring that the BCP is adequately implemented. This includes making sure the plan can be satisfactorily carried out and put into practical effect.

The Maintenance of the BCP is assigned to: VP of Compliance of Family First Credit Union who will be responsible for keeping the plan in a proper, sustainable condition. This includes maintaining or being notified of any changes to personnel, systems, architectures, risk, and other factors that would have an effect on the BCP.

The Testing and Exercise Program of the BCP is assigned to: VP of Compliance of Family First Credit Union with assistance from CastleGarde, Inc. who will be responsible for developing test plans, related testing scenarios, testing methods, testing schedules and addressing expectations for mission critical business lines and supporting functions. The Board and Management have established an enterprise wide BCP and testing program that addresses and validates the continuity of the Credit Union's mission critical operations.

The Oversight of BCP Maintenance is assigned to: The Family First Credit Union Board of Directors. The Board of Directors is accountable to review and approve the Credit Union's Business Impact Analysis and Business Continuity Plan annually. This oversight is not only required, but a component of a successful plan and organization.

Periodically the Board and Management will engage an internal audit or independent assessment of the Plan's effectiveness. Management will review and update the BCP annually and as needed. The Board of Directors will approve and document the approval in board minutes at least annually. As part of that approval, Management and the Board commit to the following schedule:

BCP Component	Annual Review	Annual Approval
Risk Assessment	May	
BIA	May	
Written BCP	June	
Exercise/Test Program	April & October	
Exercise/Test Results	April & October	

UPDATING THE PLAN

The following actions will require updating the plan. This action list is not all-inclusive. Other changes or enhancements to the Credit Union's business model may also result in updating this plan document. It is the responsibility of Executive Management and the Plan Administrator to evaluate these changes and enhancements to determine if the plan requires updating.

Actions Requiring the Plan to be updated	
Adding and subtracting of Executives, Employees or Board members or any staff changing roles within the organization	Any changes to the products and services the Credit Union provides to its membership
Adding, editing, or changing critical applications, equipment, and related processes	Main Data Center structure change or relocation
Adding, moving, or changing any facilities within the organizational structure	Any changes to methods used in servicing members (i.e. – online banking provider change)
Any changes in titles of staffing due to re-organization or other reasons	Addition or deletion of any branches
Changes in threat structure based on natural causes, societal changes, or other means such as emerging technological attack methods	Merger with another Credit Union
Any changes as a result of regulatory mandates or required guidance	Any changes to Board policies or departmental procedures affecting the Business Continuity Plan
Any changes with key vendors and relationships (i.e. – debit card processor change)	Telecom infrastructure change or telecom provider change

BUSINESS CONTINUITY PLANNING TEAM

MEMBERSHIP

The committee members, approved by the CEO and by the Board are:

- President/CEO
- CFO
- CLO
- COO
- VP of Information Technology
- VP of Marketing
- VP of Compliance – Committee Chair

The function of the team is to establish strategies to (1) minimize the disruption of services to the Credit Union and its members, (2) minimize financial losses, (3) minimize downtime (offline processing timelines), and (4) ensure a timely resumption of service in the event of a crisis.

RESPONSIBILITIES

The BCP Team will develop, implement, exercise, test, and update annually the contingency planning and recovery policies before presenting them to the Board for final review and approval. The review will be documented in the Board minutes and will note:

- Any significant departure from this Credit Union's approved policies and procedures;
- Reasons for the departure and the basis for the alternative action;
- Reasonable detail about the action as contrasted and compared with the original strategy, policy, or procedures;
- Suggestions for corrective actions for any noted deficiencies;
- Any other analytical data that will aid the Credit Union's board in making an informed decision regarding the adequacy of the Credit Union's contingency planning and disaster recovery policies and procedures.

The BCP Team will conduct a subsequent review of noted deficiencies to ensure that the deficiencies have been corrected in a suitable manner and implemented.

SECURITY AND LOCATIONS OF THE BUSINESS CONTINUITY PLAN

Due to the detail of this document, the utmost security considerations are followed to ensure access is limited to this document, based on need. Additional controls such as permissions allow the document's location to be shared while maintaining the concept of least privilege. As such, the Family First Credit Union Business Continuity Plan and supporting documents are secured and can be found at the following locations:

- Family First Credit Union network
- The homes of BCP Team of the Credit Union; at minimum
 - President/CEO
 - CFO
 - CLO
 - COO
 - VP of Information Systems
 - VP of Compliance

ORGANIZATION SUCCESSION PLAN

The following succession plan will be initiated should the CEO be unavailable to “lead” the organization post-incident:

Name	Contact Information Locally (internal to Credit Union)	Contact Information Remotely (not stored at Credit Union)
EVP/CFO	Cell Phone Directories Human Resources Department	Stored with Board of Directors
COO	Cell Phone Directories Human Resources Department	Stored with Board of Directors
CLO	Cell Phone Directories Human Resources Department	Stored with Board of Directors
***If the neither the CEO nor any of those mentioned above are available, the Board of Directors will be responsible for recovery until a successor can be named.		

ADDITIONAL DISASTER DECLARATION PROVISIONS

In addition, Family First Credit Union recognizes that a significant component of any disaster or event is the potential for chaos. To assist Executive Management Team in critical decision-making processes directly following an act or event, the following list of pre-determined conditions (otherwise called “trigger-points”) have been drafted to provide Executive Management the ability to automatically declare a disaster and invoke this written Business Continuity Plan, detailed on the following page:

BCP ACTIVATION (TRIGGER POINTS)

The Management Team of Family First Credit Union has deemed the following list to be the only occurrences in which the BCP will be put into an active state. Please note that a disaster can be declared by any person on the Executive Management Team after a post-incident assessment is performed on a case-by-case basis to determine damage or impact to facilities and staff.

1. The occurrence of any Natural Event (Hurricane, severe storm, fire, flood, earthquake, explosion, hazardous spill, lighting strike, nuclear disaster, snow/ice, tornado, air contamination, drought or water damage) that would make facilities uninhabitable;
2. The occurrence of any Malicious Events including by not limited to arson, computer/system manipulation, cybercrime, terrorism, vandalism/looting, viruses/malware/rootkits, and wars that would make systems inaccessible;
3. Any network equipment (servers, routers, switches, firewalls, etc.) damage, destruction, or failure that would cause member services disruption for more than 48 hours;
4. Primary power failure unable to be remedied within twenty-four (24) hours or the facility is uninhabitable/not accessible for more than 24 hours;
5. Communication infrastructure failure unable to be remedied within twenty-four (24) hours;
6. Pandemic Events lasting more than 48 hours and affecting over 50% of employees;
7. Fiserv CUNify core system outage of any kind that is not able to be remedied within twelve (12) hours;
8. Loss of data from Fiserv CUNify core system that could not be recovered;
9. Loss of services from a critical vendor that severely impacts member service;
10. Incidents that would render the Credit Union with an inadequate quantity of staff to serve membership.

Print the following 2 pages/forms to assess the impact of a disaster to help determine if a formal disaster will be declared, thereby invoking the BCP and following the plan contained in this document.

INITIAL STEPS UPON OFFICIAL DISASTER DECLARATION

Once a disaster is declared the first step will be for the BCP Team to assess the current situation. Depending on the scope of the disaster the following steps will begin:

- 1) **Assess situation and damage:** CEO (if CEO is unavailable, see succession plan defined in this document) will conduct meeting/conference call with the BCP Team to discuss next steps.
- 2) **Communicate assessment to the Board:** CEO and BCP Team will contact the Board with an update on the current status of the Credit Union operations.
- 3) **Assess relocation for affected staff, if needed:** CEO or BCP Team will contact Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076 (Alternate Location) to ensure the facility is not damaged and is available for relocated employees.
 - a. Alternate Command Center facility is intact and has power;
 - b. Alternate Command Center facility has internet connectivity;
 - c. Alternate Command Center facility has connectivity from the Credit Union to the **Fiserv CUNify** core system;
 - d. Alternate Command Center facility has phone systems;
- 4) **Send critical IT staff to Backup Data Center, if needed:** The BCP Team will initiate sending critical IT staff to Backup Data Center/Alternate Command Location: Roswell Office. IT staff will initiate DR response to restore critical systems and connectivity.
- 5) **Communicate with Employees:** The CEO will delegate the contacting of employees to several members of the BCP Team via cell phone, social media, website or other communication lines.
- 6) **Relocate Employees:** Employees will be directed where to report if they are to report (Management may choose to send staff home if space shortages are of concern).
- 7) **Secure impacted location:** The CEO will contact or delegate contacting a security company and/or police for physical security of remaining assets at impacted location.
- 8) **Notify insurance company:** CEO to begin notification to insurance provider and appropriate vendors that will provide solutions to the Credit Union's current situation. This includes Cybersecurity Insurance Provider.
- 9) **Notify applicable vendors:** CEO and BCP Team will ensure calls are made to critical vendors (Internet Service Provider, Debit Card/Credit Card Processor, Shared Branching, etc.) for notification so that planning and restoration purposes are made in a timely manner.
- 10) **Notify members:** The CEO with the VP of Marketing will develop/create Member & Public Notification procedures as to what locations will be available for service.
 - a) Website Notices
 - b) Social Media
 - c) Television Stations
 - d) Radio
 - e) Credit Union League
 - f) Other channels as deemed necessary
- 11) **Continued Communication:** Management Staff will be briefed periodically of status and Estimated Recovery Time to keep employees informed so they can relay correct information to members.

DISASTER DECLARATION FORM

Description of Disaster:

Date: _____

Location(s) Affected:

Assets Affected:

Disaster Officially Declared By:

- ☐ **NCUA Region Office Contacted (must be done within 5 days)**
Contact and follow NCUA specific instructions.
NCUA Southern Region – 4807 Spicewood Springs Rd, Suite 5200, Austin, TX 78759-8490
Phone: 512.342.5600 EMAIL: SouthernMail@ncua.gov

- ☐ **Georgia Department of Banking and Finance**
email and follow specific instructions as per Department Rule 80-5-2-.02
Deputy Commissioner for Supervision – Melissa Sneed
EMAIL: msneed@dbf.state.ga.us Phone: 770-986-1646.

Outside Agencies Contacted:

This form will be included in the Board packet and noted in the Board of Directors Meeting Minutes

ALTERNATE COMMAND CENTER ACTIVATION

ALTERNATE COMMAND CENTER:

For critical staff relocated from Main Office: Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076

Data Center (if destroyed or unavailable): Roswell Office / Fiserv CUNify

Family First Credit Union will use the office at Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076 as a temporary Alternate Command Center for critical staff if the 3604 Atlanta Ave., Hapeville, GA 30354 Main Office is unavailable.

The Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076 will have the following provisions during a disaster:

- 1. Independent Access to Core System:** YES
- 2. Independent Internet Connection:** YES
- 3. Independent Phone/Communications Lines:** YES
- 4. Available Office Space for Relocated Staff:** 8-11 spaces
- 5. Available Teller Stations for Relocated Staff:** 2 workstations
- 6. Number of Open Phones:** Digital VoIP through Mitel available

Conditions in which the Alternate Command Center, Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076, would be used as a temporary Primary Command Center/Main Office include:

- The 3604 Atlanta Ave., Hapeville, GA 30354 (main office) is blocked off, physically inaccessible, or uninhabitable as a result of the event;
- Primary power failure that is expected to last more than twenty-four (24) hours or if an outage estimate is not readily available;
- HVAC or water service failures with Estimated Time to Repair over 48 hours after a post-incident assessment is performed;
- Per the discretion of the Credit Union's BCP Team.

RENDEZVOUS POINT IF MAIN OFFICE IS UNAVAILABLE

Hapeville Police Department: 700 Doug Davis Dr., Hapeville, GA 30354

ASSESSING BUSINESS IMPACT OF THE DISASTER/INCIDENT

An assessment to determine the potential scale of the emergency from a business perspective is to be made at regular intervals during the recovery process and recorded as follows. (The initial assessments will usually be carried out by the Executive Management who may call on other specialists to help them with this process as appropriate.)

DESCRIPTION OF DISASTER/INCIDENT:	
COMMENCEMENT DATE:	DATE BCP/DRT MOBILIZED:

BUSINESS PROCESS AFFECTED	STATUS LEVEL (SEE TABLE BELOW)					ASSESSMENT CARRIED OUT BY	COMMENTS
	1	2	3	4	5		

THE FOLLOWING **STATUS LEVELS** SHOULD BE APPLIED:

LEVEL	DESCRIPTION
1	While inconvenient, this level of severity is representative of a minor annoyance.
2	This severity level is commensurate with an act that has an effect on at least one critical service or negative impact on one or more members.
3	Level three represents a level where services are disrupted and is directly impacting the Credit Union; however, member service can be adequately provided.
4	Level four would constitute a potential disaster scenario based on the decision tree and pre-approved thresholds/triggers to invoke the BCP.
5	Level five would be the most severe of events that would surely invoke the BCP.

DAMAGE ASSESSMENT FORM

Office Name / Location:

Date of Report:

(Date) (Time (AM/PM))

Disaster Reported (Summary):

Person Completing Report:

Description of Incident:

Damage to Facilities:

Is Facility Usable: NO YES

Detail Critical Functions Impacted:

Estimate of Downtime (if possible):

Injuries: NO YES
If Yes, Whom: Employees Members Vendors Other

Description/Detail of Injuries (include persons' names, etc.):

Credit Union Personnel Notification: CEO Management/Staff

STATUS OF COMMENTS

Electrical Power	
Voice Communication	
Data Communication	
Security/Alarms	
Computers/Equipment	
HVAC	
Teller Equipment	
Other	

CRITICAL SYSTEMS – DISASTER RECOVERY

This section of the Business Continuity Plan will briefly address Disaster Recovery of critical systems for continued operations after a disaster. This section is NOT meant to be a full DR Plan for all systems but will allow staff to understand an overview of recovery needs for critical systems.

System	Main Location for System	Backup Location	Replication Frequency	Test-Date (Last DR Failover)	NOTES
Core System Fiserv CUNify (hosted)	Cherry Hill, NJ	Louisville, TX	Continuous	5/4/2020	
Email (Office 365)	Cloud	N/A	N/A	N/A	
Network	Hapeville, GA	Tape Backup	Nightly; 2 snapshots daily	02/12/2020	
Internet (AT&T – Hapeville; Spectrum - Roswell)	Independent internet connection at each branch	NONE	N/A	N/A	<i>Backup internet connection available. Would need to change configuration.</i>
Phones (Mitel - VoIP)	Cloud	N/A	N/A	N/A	
Online Banking Server (CUNify Web - hosted)	Fiserv CUNify	Fiserv alternate location	Continuous	N/A	
Other Critical Servers (application server – in house)	Hapeville, GA	NONE	N/A	N/A	<i>No backup application server would need to order new and configure</i>
VPN router/communication equipment (Cisco VPN)	Hapeville, GA	Roswell, GA	N/A	03/09/2020	
Website Host Server (Earthlink)	League of SE Credit Unions	LSCU alternate location	Nightly	N/A	
Federal Reserve (Fedline Web)	N/A (web-based)	N/A	N/A	6/2/2020	<i>Tested remote connection for alternate Returns processing. ACH posts automatically via Fiserv CUNify</i>

RESPONSIBILITIES FOR NOTIFICATION AFTER A DISASTER

Based on the details of the act or event and the subsequent damage or disruption of member services, notification standards must be defined to ensure that the BCP Team is aware of contact to outside entities that must be established and maintained throughout the recovery and restoration process. Based on the act, disruption to services, and danger to human life, some or all of the following service standards should be followed.

GROUPS OF PERSONS OR ORGANIZATIONS AFFECTED BY DISRUPTION	CREDIT UNION LEAD TO COORDINATE COMMUNICATION TO THOSE PERSONS/ORGANIZATIONS AFFECTED
	POSITION
Employees / Management / Families/ Board Chair	President/CEO; EVP/CFO
Membership	President/CEO; EVP/CFO; COO
Regulators	President/CEO; EVP/CFO
Suppliers and Vendors	All Senior Management
Insurance	President/CEO; EVP/CFO
Media	President/CEO; VP of Marketing
Government and Community Coordination	President/CEO; EVP/CFO; COO

MEDIA – MESSAGE CREATION AND DELIVERY

The following persons have been authorized to deal with media inquiries and issue press statements, if required. All inquiries from the media must be referred to one of these authorized individuals:

NAME	POSITION WITHIN ORGANIZATION
Primary Media Contact	CEO
Secondary Media Contact	CLO
Alternate Media Contact	VP of Compliance

Policy Statement

The Credit Union's policy statement in respect of dealing with the media is as follows:

During or immediately following any disaster situation (as defined by the organizational Business Continuity Plan) that has a direct effect on the members of Family First Credit Union, authorized Credit Union personnel should prepare a public statement for release to media within twenty-four (24) hours of the incident. The statement should be drafted in such a manner in that it; does not speculate or offer conjecture, avoids the use of one's personal opinions, does not provide personal information regarding the Credit Union's employees or shareholders, and ensures the statement is written to deal directly with topics related to Family First Credit Union and its duty to serve its membership. A [Statement template](#) for use is located at the end of this document.

Assuming all authorized persons are available to speak to the media, it is the duty of the CEO to appoint a point of contact to work directly with media outlets. In the absence of the CEO, other authorized employees will work collectively on the media statement and will at that time determine the employee that will work directly with media sources. Once drafted, the assigned employee will initiate contact with local/regional media outlets to deliver the public statement.

RISK ANALYSIS

Assessing the risks facing the Credit Union that could impair Business Continuity is imperative for a complete Business Continuity Plan. The Risk Analysis has been developed to further understand and prepare for specific events that could affect the Credit Union.

(0 = Not Applicable, 1 = Low, 2 = Moderate, 3 = High)

THREATS/EVENTS						
EVENT	INHERENT RISK	HUMAN IMPACT	PROPERTY IMPACT	BUSINESS IMPACT	MITIGATING FACTORS	RESIDUAL RISK
	Likelihood this will occur, before mitigating factors	Possibility of injury or death	Physical losses and damages	Interruption of services	Credit Union implemented strategies to reduce risk including Mitigation (controls, procedures); Transference (insurance); and Avoidance (resilience planning).	Risk rating after mitigating factors
Score	0=N/A 1=Low	0=N/A 1=Low	0=N/A 1=Low	0=N/A 1=Low		0=N/A 1=Low
	2=Moderate 3=High	2=Moderate 3=High	2=Moderate 3=High	2=Moderate 3=High		2=Moderate 3=High
LOCAL EVENTS						
Data Breach/Cybersecurity Incident	2	0	1	3	Incident Response Plans, Cybersecurity Insurance, legal counsel, system backups, restoration procedures	1
Critical System Failure	2	0	1	2	System backups, restoration procedures	1
Employee Access Abuse	1	0	2	2	Incident Response Plans, Cybersecurity Insurance, legal counsel, system backups, restoration procedures	1
Reputational Incident (i.e. - embezzlement, high profile legal case, etc.)	1	0	1	2	Legal Counsel, Succession Plan, Personnel Policies	1
Loss of Access to Building (Fire, Water Damage, Wind Damage, Gas Leak, etc.)	2	2	2	3	Evacuation plans, restoration procedures	2
Water Damage (i.e. - water pipe leak)	1	0	1	2	Restoration procedure	1

Robbery/Active Shooter	1	3	1	3	Lockdown policies, evacuation plans, security guards, police response, EMT response	1
THREATS/EVENTS						
EVENT	INHERENT RISK	HUMAN IMPACT	PROPERTY IMPACT	BUSINESS IMPACT	MITIGATING FACTORS	RESIDUAL RISK
	Likelihood this will occur, before mitigating factors	Possibility of injury or death	Physical losses and damages	Interruption of services	Credit Union implemented strategies to reduce risk including Mitigation (controls, procedures); Transference (insurance); and Avoidance (resilience planning).	Risk rating after mitigating factors
Score	0=N/A	0=N/A	0=N/A	0=N/A		0=N/A
	1=Low	1=Low	1=Low	1=Low		1=Low
	2=Moderate 3=High	2=Moderate 3=High	2=Moderate 3=High	2=Moderate 3=High		2=Moderate 3=High
Critical Staff - Extended Absence/Death	1	3	0	2	Succession plan, cross training	1
Personnel strike/Walk Out	0	0	0	0	N/A	0
NEIGHBORHOOD EVENTS						
Tornado	3	3	3	3	Warning Systems, Shelters	2
Funnel Clouds	3	2	2	2	Warning Systems, Shelters	2
Flash Flooding	2	2	2	2	Warning Systems, evacuation plans	2
Lightning	2	1	1	2	Fire Department Response, fire extinguishers;	1
Waterspouts	0	0	0	0	Warning Systems, Shelters	0
Severe Thunderstorm	3	2	2	2	Warning Systems, Shelters	2
High Winds	3	2	2	2	Warning Systems, Shelters	2
Hailstorms	2	1	2	2	Warning Systems, Shelters	1
Snow Fall	1	1	0	1	Inclement weather procedures	1
Civil Unrest	1	2	2	2	Lockdown policies, evacuation plans	0
COMMUNITY EVENTS						

Board Reviewed 10/15/2020

Telecommunications/Internet Outage	2	0	0	3	Incident Response Plans, system backups, restoration procedures	1
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THREATS/EVENTS						
EVENT	INHERENT RISK	HUMAN IMPACT	PROPERTY IMPACT	BUSINESS IMPACT	MITIGATING FACTORS	RESIDUAL RISK
	Likelihood this will occur, before mitigating factors	Possibility of injury or death	Physical losses and damages	Interruption of services	Credit Union implemented strategies to reduce risk including Mitigation (controls, procedures); Transference (insurance); and Avoidance (resilience planning).	Risk rating after mitigating factors
Score	0=N/A 1=Low	0=N/A 1=Low	0=N/A 1=Low	0=N/A 1=Low		0=N/A 1=Low
	2=Moderate 3=High	2=Moderate 3=High	2=Moderate 3=High	2=Moderate 3=High		2=Moderate 3=High
Power Outage	2	2	2	3	No generator at Credit Union, no contract with recovery services, would need to acquire one in the event of a longer-term power outage	2
Water Outage	2	2	2	2	Relocation procedures	1
Transportation Interruption	1	0	0	1	Succession plan, cross training	1
Landslide	0	0	0	0	N/A	0
Dam Inundation/Levee Failure	0	0	0	0	N/A	0
REGIONAL EVENTS						
Hurricane	3	2	2	2	Warning Systems, Shelters	1
Blizzard	1	1	0	3	Warning Systems, Inclement weather procedures	1
Ice Storm	1	1	0	3	Warning Systems, inclement weather procedures	1
Earthquake	1	0	0	0	First aid kits, EMT response, earthquake plans	0
Tidal Wave	0	0	0	0	N/A	0
Temperature Extremes	3	1	1	1	Properly maintained heating & cooling systems	1
Drought	2	1	0	1	Water Conservation Guidelines	0
Wild Fire	0	0	0	0	N/A	0

Volcano	0	0	0	0	N/A	0
THREATS/EVENTS						
EVENT	INHERENT RISK	HUMAN IMPACT	PROPERTY IMPACT	BUSINESS IMPACT	MITIGATING FACTORS	RESIDUAL RISK
	Likelihood this will occur, before mitigating factors	Possibility of injury or death	Physical losses and damages	Interruption of services	Credit Union implemented strategies to reduce risk including Mitigation (controls, procedures); Transference (insurance); and Avoidance (resilience planning).	Risk rating after mitigating factors
Score	0=N/A 1=Low	0=N/A 1=Low	0=N/A 1=Low	0=N/A 1=Low		0=N/A 1=Low
	2=Moderate 3=High	2=Moderate 3=High	2=Moderate 3=High	2=Moderate 3=High		2=Moderate 3=High
Epidemic	2	2	1	2	Pandemic Plan, First Aid kits	1
STATEWIDE EVENTS						
Pandemic	1	2	1	3	Pandemic Plan, HR Policy, Remote Access Policy, First Aid kits	1
War	1	2	2	2	Lockdown policies, evacuation plans	1
Political / Regulatory	1	2	2	2	Board policies, legal counsel	1
REMOTE EVENTS						
Critical Vendor - Failure	2	1	1	3	Vendor Management program	1
Critical Vendor - Breach	2	1	1	3	Vendor Management program, Incident Response Plan	1

BUSINESS IMPACT ANALYSIS (BIA)

In direct reference to the Plan Methodology previously explained, a collaborative approach was utilized to create a functional BIA. CastleGarde and Family First Credit Union co-developed the Credit Union's Business Impact Analysis. The basis of the BIA was to determine critical needs for the Credit Union with regard to servicing membership while limiting risk of asset losses (information and physical), financial losses, and the Credit Union's reputation within the regional areas where the Credit Union has a presence. The BIA represents the Credit Union's Risk Assessment as it relates to a myriad of possible disaster scenarios.

The BIA provides the "order of recovery operations" based on interdependency of critical functions and impact to the membership, likelihood of occurrence and costs to the organization. Included in the BIA are calculations for Maximum Acceptable Losses, Recovery Point Objectives, Recovery Time Objectives, Maximum Tolerable Downtimes, Critical Function Recovery Lead, Instructions and Authority over each process and instructions for alternate processing (workarounds) to service members in the absence of normal operating conditions. Upon approval by the BCP Team and the Board of Directors (***MUST BE PERFORMED ANNUALLY***), the BCP is written and periodically updated to account for changes in the operating environment.

The following is the "Executive Summary" of the BIA. While supporting calculations and documentation were used to create the BIA, a shorter document will hopefully provide for less confusion in reading the document which should translate to a smoother and more efficient recovery/restoration for Family First Credit Union. This document can also be found in Microsoft Excel format.

BUSINESS IMPACT ANALYSIS – RECOVERY ORDER OF OPERATIONS SUMMARY

Item #	Critical Function	Recovery Lead	IMPACT Rating	RPO (hrs)	MTD (hrs)	Maximum Acceptable Loss	NOTES
1	Ensure Safety of Human Lives - post disaster/event	All Credit Union employees, First Responders (EMT, Fire/Rescue, Police, Federal Agencies)	20	N/A	1	\$438	Based on event, ensure safety of life.
2	Account for all staff present during disaster	CEO, Management	20	N/A	1	\$438	CEO and Senior Management to roll call, tally and track employees at affected offices.
3	Depending on Disaster, contact government agencies as necessary (Fire, Police, FBI, etc.)	CEO, Management	20	N/A	1	\$438	Available management will need to contact appropriate agencies.
4	Create and communicate initial damage report	CEO, Management and First Responders (EMT, Fire/Rescue, Police, Federal Agencies)	20	N/A	2	\$438	Is building inaccessible, if so, what occurred and what is extent of the damage?
5	Data Security and Confidentiality	CEO, Management	20	N/A	2	\$438	Begin necessary due diligence with data security; Physical Security of any documents containing sensitive member information.
6	Contact Cybersecurity insurance company and cyber-crimes law enforcement to initiate claim and forensic investigation, if applicable	CEO, CFO, COO	20	N/A	4	\$8,757	Contact Cybersecurity insurance company, attorney and/or law enforcement (FBI, US-CERT, FinCEN) to initiate claim and determine next steps.
7	Secure Impacted Location	CEO, Management	20	N/A	4	\$730	Restore physical security to affected location(s) (alarms, cameras, etc.); Ensure doors are physically locked if power lost; Determine if additional security is needed (armed guards, remove cash via armored car service, etc.).
8	Decision - Enact BCP?	CEO, CFO, COO	20	N/A	4	\$438	Launch the Plan based on damage, pre-determined thresholds or event source, notify Board if necessary.

Item #	Critical Function	Recovery Lead	IMPACT Rating	RPO (hrs)	MTD (hrs)	Maximum Acceptable Loss	NOTES
9	Create, approve, and deliver messages to members and staff regarding disaster.	CEO, Management	20	N/A	4	\$438	Create and deliver updates to staff via approved/available communications with details on work scheduling, location, etc.; create and deliver messages to members via website, automated phone attendant, email blasts, social media, etc.
10	Obtain a copy of the BCP/DR PLAN for guidance in the recovery process	CEO, Management	20	N/A	4	\$876	Management will have a copy of the plan as well as a backup electronic copy at DR location.
11	Contact Insurance Company, if necessary	CEO, CFO, COO	20	N/A	24	\$438	Contact Credit Union insurance company, if deemed necessary, so claim can be started quickly.
12	Contact contractors and or restoration companies, if necessary	CEO, CFO, COO	20	N/A	24	\$438	Contact restoration companies or contractors and to assess damage repair costs for affected locations.
13	Notify Core System Provider of Disaster Declaration to initiate DR Response	VP of IT, IT Department	20	N/A	12	\$803	Core System Provider should be notified of disaster declaration and vendor put on stand by for further information from the Credit Union.
14	Notify Debit Card Processor of disaster declaration to initiate DR Response	COO, VP of Compliance	20	N/A	12	\$803	Debit Card Processor should be notified of disaster declaration and vendor put on stand by for further information from the Credit Union.
15	Notify Credit Card Processor of disaster declaration to initiate DR Response	COO, VP of Compliance	20	N/A	12	\$803	Credit Card Processor should be notified of disaster declaration and vendor put on stand by for further information from the Credit Union.
16	Notify ATM Processor of disaster declaration to initiate DR Response	COO, VP of Compliance	20	N/A	12	\$803	ATM processor should be notified of disaster declaration and vendor put on stand by for further information from the Credit Union.
17	Ensure Member Service Delivery Channels such as Website, Home Banking, Mobile Banking, etc. are available	VP of IT, IT Department	20	12	24	\$2,554	IT Department will need to ensure website, home banking and mobile banking are online (servers hosted at Credit Union) and available to members.

Item #	Critical Function	Recovery Lead	IMPACT Rating	RPO (hrs)	MTD (hrs)	Maximum Acceptable Loss	NOTES
18	Ensure Core System is accessible at Alternate Locations for affected employees	VP of IT, IT Department	20	12	48	\$2,554	Branches have independent connections to Fiserv CUNify core. Additional remote connection may require configuration to obtain static IP address.
19	Ensure internet connection is available at Alternate Locations for affected employees	VP of IT, IT Department	20	N/A	120	\$2,554	Internet access is independent by branch and would remain available at unaffected locations in a contingency event.
20	Route incoming calls to alternate branches if necessary	VP of IT, IT Department	20	N/A	120	\$2,919	Phones are Mitel VoIP cloud based and can function from any Credit Union owned laptop or PC with access to the internet.
21	Employee Workstations set up at Alternate Locations for affected employees - computers and phones	VP of IT, IT Department	20	1	48	\$2,554	One of the first phases of relocation for affected employees; IT Department will need to set up computers and phones for relocated staff.
22	Relocate necessary staff to Alternate Command Center or other locations, if necessary	CEO, Management	20	1	72	\$2,554	If main office is unavailable, critical staff need to relocate to remote or alternate branch; communication will be done via cell phone calls/text messaging, emails, website notification.
23	Restoration of network file access is available at Alternate Locations for affected employees	VP of IT, IT Department	20	1	72	\$2,372	If main office (data center) is unavailable, then files would need to be restored from tape backup to other branch location for network access.
24	Restoration of Email at Alternate Locations for affected employees	VP of IT, IT Department	20	1	72	\$1,277	Email is cloud based through Office 365 and would remain available in a contingency event via any available internet connection. Additionally, C-level and VP staff have email synced to cell phones and remote laptop devices.

Item #	Critical Function	Recovery Lead	IMPACT Rating	RPO (hrs)	MTD (hrs)	Maximum Acceptable Loss	NOTES
25	ACH and Exception processing	COO, Accounting Department	18	N/A	48	\$3,649	ACH files are automatically downloaded and posted to members accounts; Accounting staff works exceptions. Federal Reserve token and certificate needed. Remote Desktop connection tested 6/2/2020.
26	Restore (hosted) ATM connectivity, if necessary	VP of IT, IT Department	16	24	96	\$912	If main office (data center) is unavailable, then router configuration changes need to be made for ATM's.
27	Restore Debit Card connectivity, if necessary	VP of IT, IT Department	16	N/A	48	\$2,189	Debit Card transactions are hosted via the processor Fiserv EFT and would remain available in a contingency event.
28	Restore Credit Card connectivity, if necessary	VP of IT, IT Department	16	N/A	48	\$2,189	Credit Card transactions are hosted via the processor Fidelity-FIS and would remain available in a contingency event.
29	IT Department Restoration	VP of IT, IT Department	18	N/A	72	\$912	Providing departments with further restoration of technology needs, such as non-critical software, printers, communications, etc.
30	Accounting Department Restoration	CFO, COO, Accounting Department	16	N/A	72	\$328	Department Restoration Needs(systems): Core System, Internet with important website links, email, network shared drives; tokens for Catalyst Corporate CU, Federal Reserve and Deluxe; check printers and check stock; and other systems as needed.
31	Branch Operations: South (Hapeville) Branch and North (Roswell) Branch	COO, CLO, Branch Managers	16	N/A	72	\$1,642	Department Restoration Needs(systems): Core System, Internet with important website links, email, network shared drives, and other systems as needed.
32	Call Center Restoration	COO, Call Center	16	N/A	72	\$657	Department Restoration Needs(systems): Core System, Internet with important website links, email, network shared drives, and other systems as needed.

Item #	Critical Function	Recovery Lead	IMPACT Rating	RPO (hrs)	MTD (hrs)	Maximum Acceptable Loss	NOTES
33	Consumer Lending Restoration	CLO, VP Real Estate Lending, Branch Managers	15	N/A	96	\$985	Department Restoration Needs(systems): Core System, Internet with important website links, email, network shared drives, FIS certificate, and other systems as needed.
34	Member Solutions (Collections) Department Restoration	CLO, Member Solutions Manager	12	N/A	120	\$219	Department Restoration Needs(systems): Core System, Internet with important website links, email, network shared drives, Catalyst Corporate CU token (ACH payment origination) and other systems as needed.
35	Marketing Department Restoration	VP of Marketing, Marketing Department	12	N/A	120	\$219	Department Restoration Needs(systems): Core System, Internet with important website links, email, network shared drives, Adobe Design Suite, and other systems as needed.
36	Compliance Department Restoration	VP of Compliance, Compliance Department	10	N/A	120	\$219	Department Restoration Needs(systems): Core System, Internet with important website links, email, network shared drives, Catalyst Corporate CU and Deluxe tokens, FIS token and certificate, and other systems as needed.
37	Real Estate Lending Department Restoration	CLO, VP Real Estate Lending	10	N/A	336	\$219	Department Restoration Needs(systems): Core System, Internet with important website links, email, network shared drives, and other systems as needed.
38	Human Resources (Functions)	CEO, COO, CFO, VP of Compliance	10	N/A	336	\$219	Shared duties among Executive Management: requires Internet with important website links, email, network shared drives, (PayChex payroll online) and other systems as needed.
39	Contact Applicable Vendors as required	CEO/Management	10	N/A	336	\$219	Contact Vendors to obtain assistance, follow-up on earlier requests, etc. - Recurring.
40	Notify Regional NCUA Office of Catastrophic Event	CEO/Management	10	N/A	120	\$219	FILE NCUA CAR and submit; Contact other Regulatory Agencies if not already done.

Item #	Critical Function	Recovery Lead	IMPACT Rating	RPO (hrs)	MTD (hrs)	Maximum Acceptable Loss	NOTES
41	All Departments - Long Term Recovery	CEO/Management	10	N/A	360	\$109	Long term recovery of all departments.

Cost Per Incident/Disaster (Before Insurance)**\$51,958****BUSINESS IMPACT ANALYSIS KEY**

KEY - TOTAL IMPACT RATING	
CRITICAL PRIORITY	16 to 20
URGENT PRIORITY	11 to 15
IMPORTANT PRIORITY	6 to 10
NORMAL PRIORITY	1 to 5
NON-ESSENTIAL or UNRATED	0

Impact Rating (Net Impact)	Impact Rating or Net Impact is the criticality (interdependency) rating assigned to the item by Management based on impact to back and front office operations.
Recovery Point Objective (RPO)	The point in time prior to an event or disruption to which data can be recovered (most recent backup). The loss of data from this period (RPO) can be lost without severely impacting the recovery of operations. ***MAY NOT APPLY TO ALL CRITICAL FUNCTIONS
Maximum Tolerable Downtime (MTD)	MTD is the critical disruption point at which downtime is excessive; severely impacting recovery and causing potential for continued data loss as well as operational, reputational or financial loss to the organization.
Maximum Acceptable Loss	The total acceptable (estimated) loss related to a critical function recovery exceeding the MTD. This column is calculated by adding the Estimated Losses columns (Revenue, Legal, Recovery) and multiplying by the "Likelihood of Occurrence" column.

BUSINESS CONTINUITY OVERSIGHT OF THIRD-PARTY SERVICE PROVIDERS

Family First Credit Union relies on Technology Service Providers (TSP's) to provide critical services for Credit Union operations. Some of these services include, but are not limited to:

- Core System
- Online Banking
- Mobile Banking
- Shared Branching
- Internet Service
- Communications (Telecom)
- Website Hosting
- Phone System
- Intrusion Detection/Protection/Managed Firewall Services
- Department Specific Software/Hardware (i.e. – loan systems)
- Systems Infrastructure
- ATM's
- Debit Card/Credit Card Processor

As part of the overall Credit Union Business Continuity Plan, Family First Credit Union must appropriately assess the relationship with mission critical TSP's. [Appendix D](#) will assist Family First Credit Union in strengthening the relationship with critical TSP's by evaluating the following areas:

1. TSP management
2. TSP capacity
3. TSP testing
4. TSP resilience to a cybersecurity disruption

Individual Departments at Family First Credit Union will be responsible for their respective oversight of TSP's. TSP's should be reviewed in accordance with the vendor management policy, and concerns presented to management and the Board as needed.

DEPARTMENTAL RECOVERY

The following section will define departmental recovery in terms of Recovery and Restoration Actions, Critical Personnel Resources, Critical Vendors, Computing Needs, Communication Needs, and Departmental Procedures.

Departments included are as follows:

EXECUTIVE MANAGEMENT
ACCOUNTING
BRANCH OPERATIONS
CALL CENTER
COMPLIANCE
CONSUMER LENDING
INFORMATION TECHNOLOGY
MARKETING
MEMBER SOLUTIONS (COLLECTIONS)
MORTGAGES

EXECUTIVE MANAGEMENT RECOVERY

The President/CEO or the acting President/CEO of Family First Credit Union should follow this critical list of duties with timing deadlines (Recovery Time Objectives) included ensuring the first stages of credit union recovery occur, thereby starting the chain reaction that will allow all supported business units to subsequently recover to the best operating state possible given the conditions “at point in time”. Available staff (post-event) will be utilized to best fulfill the Credit Union’s immediate and short-term operational needs.

Considerations may need to be made for employee needs outside of work (i.e. – were employees’ homes destroyed, time off with pay, daily needs such as food and lodging, daycare, etc.) Employee communication is critical after a disaster, and Executive Management will play a large role in that communication.

Executive Management is also responsible for much of the Credit Union’s back-office operations including responsibilities for Human Resources and Facilities Operation, including contracted security agents.

Executive Management Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure Safety of Human Lives - post disaster/event	1	
Account for all staff present during disaster	1	
Which offices/branches are affected? (Will affected branch have severe impact on Credit Union operations?)	1	
Depending on Disaster, contact government agencies as necessary (Fire, Police, FBI, etc.)	1	
Create and communicate initial damage report	2	
Data Security and Confidentiality – Secure Impacted Location	2	
Decision - Enact BCP?	2	
Create, approve, and deliver messages to members and staff regarding disaster.	4	
Obtain a copy of the BCP/DR PLAN for guidance in the recovery process	4	
Contact Insurance Company, if necessary	12	
Contact contractors and or restoration companies, if necessary	12	
Assist with relocation of critical staff to alternate locations, if necessary	48	
Assist Other Departments Restoration, as needed	72	
Ensure hiring processes are in place for new talent acquisition	120	
Contact Applicable Vendors as required	120	
Notify Regional NCUA Office of Catastrophic Event	120	
All Departments - Long Term Recovery	336	

EXECUTIVE MANAGEMENT CRITICAL FUNCTIONS (CONTINUED)

CRITICAL RESOURCES

Personnel

Available Executives (See Succession Plan if necessary)

Location(s)

Operations Center/Headquarters: **3604 Atlanta Ave., Hapeville, GA 30354**

Alternate Location: **Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076**

ACCOUNTING RECOVERY

The Accounting Department is overseen by the EVP/CFO along with the COO. This department is responsible for all accounting functions, including ACH and share draft returns and balancing, general ledger balancing, ATM balancing, credit card, debit card balancing, wires, accounts payable, corporate account handling and employee payroll and benefits.

Accounting Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure Safety of Human Lives - post disaster/event	1	
Account for all staff present during disaster	1	
Assist with relocating critical staff to Alternate locations, if necessary	48	
Assist with employee workstations set up at Alternate Locations for affected employees	48	
Assist with phone restoration at Alternate Locations for affected employees	48	
Assist with core system restoration at Alternate Location for affected employees	48	
Assist with internet restoration at Alternate Location for affected employees	48	
Assist with restoration of email at Alternate Locations, if necessary, for affected staff	48	
Assist with restoration of file servers at Alternate Locations, if necessary, for affected staff	48	
ACH Exception Processing	48	
Accounting Restoration (Non-critical functions, department specific)		
Accounts Payable	72	
General Ledger Balancing	72	
ATM Balancing	72	
Credit/Debit Card Balancing	72	
Member Wires	72	
Corporate Account Balancing	72	
Cash Ordering	72	
Manage/process payroll and employee benefits	120	
Contact Applicable Vendors as required	120	
Accounting Department Recovery (Long Term)	336	

ACCOUNTING RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
EVP/CFO	1	1	Remote	COO
COO	-	-	-	See Branch Operations
Accounting Specialist	1	1	Roswell	Acct Clerk /New Hire
Accounting Clerk	2	1	Roswell	New Hire
TOTAL FOR DEPARTMENT	4	3		

Location(s)

Operations Center/Headquarters: **3604 Atlanta Ave., Hapeville, GA 30354**

Alternate Location: **Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

Catalyst Corporate token

Fedline token

Deluxe token

VPN Access (remote desktop)

Check Printer, check stock

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\Accounting Procedures
(offsite storage on tape backup at Roswell)

BRANCH OPERATIONS RECOVERY

Branch Operations is overseen by the Chief Operations Officer (COO). Branch Operations is responsible for the majority of “front-end” member transactions, including but not limited to, in branch transactions (cash and non-cash), loan applications, member transactions and inquiries over the phone, and handling other member needs through the branches. Restoring Branch Operations will be critical for member service after a disaster.

Branch Operations Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure safety of human lives - post disaster/event	1	
Account for all staff present during disaster	1	
Assist with relocating necessary staff to Alternate locations, if necessary	48	
Assist with employee workstations set up at Alternate Locations for affected employees	48	
Assist with phone restoration at Alternate Locations for affected employees	48	
Assist with core system restoration at Alternate Location for affected employees	48	
Assist with internet restoration at Alternate Location for affected employees	48	
Assist with restoration of email at Alternate Locations, if necessary, for affected staff	48	
Assist with restoration of file servers at Alternate Locations, if necessary, for affected staff	48	
In-branch member transactions	72	
Perform maintenance on member accounts	72	
Perform member transactions over the phone	72	
Open new member accounts	72	
Balance vault / cash drawers / night deposits	72	
Handling member inquiries	72	
Branch Operations Restoration (Non-critical functions, department specific)		
Loan application processing	96	
Contact Applicable Vendors as required	96	
Branch Operations Department Recovery (Long Term)	120	

BRANCH OPERATIONS RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
COO	1	1	Remote	CEO / New Hire
Branch Managers	-	-	Any Branch	See Consumer Lending (reports to CLO)
Consumer Loan Officer/MSR	-	-	Any Branch	See Consumer Lending
Member Service Reps	3	2	Any Branch	Tellers
Head Teller, <i>Hapeville</i>	1	0	TBA	Branch Manager
FT Teller, <i>Hapeville</i>	2	1	Any Branch	Member Service Reps
FT MSR/Teller, <i>Roswell</i>	2	1	Any Branch	
PT Teller, <i>Hapeville</i>	1	0		temp or leave vacant
PT MSR/Teller, <i>Roswell</i>	1	0		temp or leave vacant
TOTAL FOR DEPARTMENT	11	5		

Location(s)

Operations Center/Headquarters: **All Branch Locations**

Alternate Location: **Available Branch Locations**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

FIS certificate

Fiserv token

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\Branch Operations Procedures

(offsite storage on tape backup at Roswell)

CALL CENTER RECOVERY

The Call Center is responsible for all inbound phone inquiries from members, and meeting Recovery Time Objectives will be crucial to mitigate reputational risk with members after a disaster. This department may need additional (human) resources after a disaster to handle increased call volume.

Call Center Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure safety of human lives - post disaster/event	1	
Account for all staff present during disaster	1	
Assist with relocating necessary staff to Alternate locations, if necessary	48	
Assist with employee workstations set up at Alternate Locations for affected employees	48	
Assist with phone restoration at Alternate Locations for affected employees	48	
Assist with core system restoration at Alternate Location for affected employees	48	
Assist with internet restoration at Alternate Location for affected employees	48	
Assist with restoration of email at Alternate Locations, if necessary, for affected staff	48	
Assist with restoration of file servers at Alternate Locations, if necessary, for affected staff	48	
Perform member transactions over the phone	72	
Handling member inquiries	72	
Call Center Restoration (Non-critical functions, department specific)		
Member account processing and file maintenance	96	
Contact Applicable Vendors as required	96	
Call Center Recovery (Long Term)	120	

CALL CENTER RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
COO	-	-	-	See Branch Operations
FT Call Center	1	1	Roswell	PT Call Center
PT Call Center	3	2	Roswell	temp / new hire
TOTAL FOR DEPARTMENT	4	3		

Location(s)

Operations Center/Headquarters: **3604 Atlanta Ave., Hapeville, GA 30354**

Alternate Location: **Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\Call Center Procedures
(offsite storage on tape backup at Roswell)

COMPLIANCE RECOVERY

The Compliance Department is overseen by the VP of Compliance and is responsible for mitigation of risk and fraud loss to the Credit Union, including card and check fraud investigations, filing of CTRs/SARs, BSA/AML, updating policy and procedure, employee training, as well as assisting with card services, special projects (product development) and vendor management. Maintaining Credit Union compliance with regulations and mitigating risk will be an important function for the Credit Union after a disaster.

Compliance Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure Safety of Human Lives - post disaster/event	1	
Account for all staff present during disaster	1	
Assist with relocating critical staff to Alternate locations, if necessary	48	
Assist with employee workstations set up at Alternate Locations for affected employees	48	
Assist with phone restoration at Alternate Locations for affected employees	48	
Assist with core system restoration at Alternate Location for affected employees	48	
Assist with internet restoration at Alternate Location for affected employees	48	
Assist with restoration of email at Alternate Locations, if necessary, for affected staff	48	
Assist with restoration of file servers at Alternate Locations, if necessary, for affected staff	48	
CTRs/SARs filing with FinCEN	48	
Management of card and check fraud investigations	48	
Compliance Restoration (Non-critical functions, department specific)		
Card services maintenance and plastics program management	72	
BSA/AML Compliance	120	
Ensure training program is in place for new and existing employees	120	
Contact Applicable Vendors as required	120	
Compliance Department Recovery (Long Term)	336	

COMPLIANCE RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
VP of Compliance	1	1	Remote	Compliance Specialist
Compliance Specialist	1	0	-	new hire / leave vacant
TOTAL FOR DEPARTMENT	1	1		

Location(s)

Operations Center/Headquarters: **3604 Atlanta Ave., Hapeville, GA 30354**

Alternate Location: **Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

VPN Access (remote desktop)

Catalyst token (ACH)

Deluxe token (check orders)

Fidelity token (credit cards)

Fiserv token (debit cards)

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\Compliance Department Procedures

(offsite storage on tape backup at Roswell)

CONSUMER LENDING RECOVERY

The Consumer Lending Department is overseen by the Chief Lending Officer (CLO). The Consumer Lending Department is responsible for all functions pertaining to lending, including application, underwriting, processing, funding, and maintenance.

Consumer Lending Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure Safety of Human Lives - post disaster/event	1	
Account for all staff present during disaster	1	
Assist with relocating necessary staff to Alternate locations, if necessary	48	
Assist with employee workstations set up at Alternate Locations for affected employees - computers and phones	48	
Assist with phone restoration at Alternate Locations for affected employees	48	
Assist with core system restoration at Alternate Location for affected employees	48	
Assist with internet restoration at Alternate Location for affected employees	48	
Assist with restoration of email at Alternate Locations, if necessary, for affected staff	48	
Assist with restoration of file servers at Alternate Locations, if necessary, for affected staff	48	
Consumer Lending Restoration (Non-critical functions, department specific)		
Process loan applications	96	
Underwrite loan applications	96	
Loan processing and funding	96	
Post-loan closing tasks	120	
Loan maintenance	120	
Provide other loan support for members	120	
Contact Applicable Vendors as required	120	
Consumer Lending Recovery (Long Term)	336	

CONSUMER LENDING RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
CLO	1	1	Remote	VP of Real Estate Lending
Branch Managers	2	1	Any Branch	other Branch Manager
Loan Officers	2	1	Any Branch	Branch Manager
Consumer Loan Officer/MSR	1	-	Any Branch	other Loan Officer
TOTAL FOR DEPARTMENT	13	19		

Location(s)

Operations Center/Headquarters: **All Branch Locations**

Alternate Location: **Available Branch Locations**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

FIS certificate

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\Consumer Lending Procedures
(offsite storage on tape backup at Roswell)

INFORMATION TECHNOLOGY RECOVERY

The Information Technology Department is overseen by the VP of Information Technology. This department is ultimately responsible for all computer and network operations, telephony services, data recovery and restoration, and all other systems utilized by the Credit Union. The department is also responsible for member service delivery channels, such as home banking and the website. Due to the level of reliance that the Credit Union has on Information Technology, meeting Recovery Time Objectives for this department will be extremely critical.

Information Technology Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure Safety of Human Lives – post disaster/event	1	
Account for all staff present during disaster	2	
Data Security and Confidentiality	2	
Notify Core System Provider of Disaster Declaration to initiate DR Response	12	
Notify Debit/Credit Card Processor of disaster declaration to initiate DR Response	12	
Notify ATM Processor of disaster declaration to initiate DR Response	12	
Notify Shared Branching Provider of disaster declaration to initiate DR Response	12	
Ensure Member Service Delivery Channels such as website, online banking, mobile banking, etc. are available	12	
Route incoming calls to alternate branches if necessary	12	
Relocate critical staff to secondary data center or other locations, if necessary	24	
Relocate necessary staff to Alternate Command Center or other locations, if necessary	24	
Employee Workstations set up at Alternate Locations for affected employees - computers and phones	48	
Ensure Core System is accessible at Alternate Locations for affected employees	48	
Ensure internet connection is available at Alternate Locations for affected employees	48	
Restoration of network file access is available at Alternate Locations for affected employees	48	
Restoration of Email at Alternate Locations, if necessary	48	
Restore ATM connectivity, if necessary	48	
Restore debit card connectivity, if necessary	48	
Restore credit card connectivity, if necessary	48	
Restore Shared Branching connectivity, if necessary	48	
Information Technology Recovery (Long Term)	336	

INFORMATION TECHNOLOGY RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
VP of IT	1	1	Remote	New Hire
IT Specialist	1	1	Remote	New Hire
TOTAL FOR DEPARTMENT	2	2		

Location(s)

Operations Center/Headquarters: **3604 Atlanta Ave., Hapeville, GA 30354**

Alternate Location: **Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

VPN Access (remote desktop)

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\IT Department Procedures
(offsite storage on tape backup at Roswell)

Disaster Recovery Policy/Procedures

Stored on Credit Union local network – O:\2020 Family First Credit Union Policies
(offsite storage on tape backup at Roswell)

Incident Response Policy/Procedures

Stored on Credit Union local network – O:\2020 Family First Credit Union Policies\Information Security Standards and Procedures
(offsite storage on tape backup at Roswell)

MARKETING RECOVERY

The Marketing Department is overseen by the VP of Marketing. The Marketing Department is responsible for overall management of the Credit Union “brand.” The Marketing Department creates all marketing material (print, in-branch marketing, etc.), develops promotions, social media and website marketing as well as Select Employer Group (SEG) and school-based community relationships. Marketing will play an integral role in communication to members after a disaster event.

Marketing Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure Safety of Human Lives - post disaster/event	1	
Account for all staff present during disaster	1	
Create, approve and deliver messages to members regarding disaster	4	
Assist with relocating necessary staff to Alternate locations, if necessary	48	
Assist with employee workstations set up at Alternate Locations for affected employees - computers and phones	48	
Assist with phone restoration at Alternate Locations for affected employees	48	
Assist with core system restoration at Alternate Location for affected employees	48	
Assist with internet restoration at Alternate Location for affected employees	48	
Assist with restoration of email at Alternate Locations, if necessary, for affected staff	48	
Assist with restoration of file servers at Alternate Locations, if necessary, for affected staff	48	
Marketing Restoration (Non-critical functions, department specific)		
Website updates through LSCU	72	
Update/monitor social media content	120	
In-branch marketing development	120	
Organize community development, school, SEG events	120	
Create new marketing promotions with third-party vendor Growth by Design	120	
Contact Applicable Vendors as required	120	
Marketing Department Recovery (Long Term)	336	

MARKETING RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
VP of Marketing	1	1	Remote	CEO
Marketing Specialist	2	0	Remote	Outside Agency (Growth by Design)
TOTAL FOR DEPARTMENT	3	1		

Location(s)

Operations Center/Headquarters: **3604 Atlanta Ave., Hapeville, GA 30354**

Alternate Location: **Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

Adobe Design Suite

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\Marketing Procedures

(offsite storage on tape backup at Roswell)

MEMBER SOLUTIONS (COLLECTIONS) RECOVERY

The Member Solutions Department is overseen by the Member Solutions Manager and reports to the CLO. This department handles all functions related to delinquent account activity for the Credit Union. During recovery from a Disaster Event, this department may be called on to assist with recovery in other areas of the Credit Union since collections may not be critical within the first 48 hours.

Member Solutions Department Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure Safety of Human Lives - post disaster/event	1	
Account for all staff present during disaster	1	
Assist with relocating necessary staff to Alternate locations, if necessary	48	
Assist with employee workstations set up at Alternate Locations for affected employees - computers and phones	48	
Assist with phone restoration at Alternate Locations for affected employees	48	
Assist with core system restoration at Alternate Location for affected employees	48	
Assist with internet restoration at Alternate Location for affected employees	48	
Assist with restoration of email at Alternate Locations, if necessary, for affected staff	48	
Assist with restoration of file servers at Alternate Locations, if necessary, for affected staff	48	
Member Solutions Restoration (Non-critical functions, department specific)		
Call delinquent members	120	
Perform account maintenance on delinquent members	120	
Proceed with charge offs on account over 120 days	120	
Call members to follow up on payment plans (payments not received)	120	
Contact Applicable Vendors as required	120	
Member Solutions Department Recovery (Long Term)	336	

COLLECTIONS RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
Member Solutions Manager	1	1	Remote	CLO
FT Member Solutions Specialist	2	1	Roswell	other MS Specialist
PT Member Solutions Specialist	1	0		new hire / leave vacant
TOTAL FOR DEPARTMENT	4	2		

Location(s)

Operations Center/Headquarters: **3604 Atlanta Ave., Hapeville, GA 30354**

Alternate Location: **Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

VPN Access (remote desktop)

ACH Catalyst and token (ACH payments origination)

Printers

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\Member Solutions Procedures

(offsite storage on tape backup at Roswell)

REAL ESTATE LENDING DEPARTMENT RECOVERY

The Real Estate Lending Department is overseen by the VP of Real Estate Lending. The Real Estate Lending Department is responsible for real estate loan applications, underwriting, processing, closings, funding, and post-closing tasks for mortgages. This department is also responsible for regulatory reporting requirements related to mortgage lending (HMDA).

Real Estate Lending Critical Functions

Recovery/Restoration Action	RTO	Completed
Ensure Safety of Human Lives - post disaster/event	1	
Account for all staff present during disaster	1	
Assist with relocating necessary staff to Alternate locations, if necessary	48	
Assist with employee workstations set up at Alternate Locations for affected employees - computers and phones	48	
Assist with phone restoration at Alternate Locations for affected employees	48	
Assist with core system restoration at Alternate Location for affected employees	48	
Assist with internet restoration at Alternate Location for affected employees	48	
Assist with restoration of email at Alternate Locations, if necessary, for affected staff	48	
Assist with restoration of file servers at Alternate Locations, if necessary, for affected staff	48	
Real Estate Lending Restoration (Non-critical functions, department specific)		
Process real estate loan applications	120	
Underwrite real estate loans	120	
Fund real estate loans	120	
Post-closing processing on real estate loans	120	
Contact Applicable Vendors as required	120	
Servicing mortgage loans	336	
Real Estate Lending Department Recovery (Long Term)	336	

REAL ESTATE LENDING DEPARTMENT RECOVERY (CONTINUED)

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN DEPARTMENT	MINIMUM REQUIRED	RELOCATE TO	CROSS TRAINED/SUCCESSOR
VP of Real Estate Lending	1	1	Remote	CLO / new hire
Mortgage Originator	1	0	TBA	VP of Real Estate Lending
TOTAL FOR DEPARTMENT	2	1		

Location(s)

Operations Center/Headquarters: **1560 Holcomb Bridge Rd., Roswell, GA 30076**

Alternate Location: **Hapeville Office, 3604 Atlanta Ave., Hapeville, GA 30354**

Critical Vendors – [Critical Vendor List](#)

Computing Needs (applications/systems)

PC with MS Office

Network Access for Files

Fiserv CUNify System Access

Blue Point Solutions

HMDA

Check Printers

Internet Access – various websites, credentials/tokens/certificates for certain vendor websites

Communication Needs (email/phones)

Internet, email, phones

Procedures

Stored on Credit Union local network – O:\Real Estate Lending Procedures
(offsite storage on tape backup at Roswell)

BRANCH LEVEL RECOVERY

The following section will define specific branch recovery in terms of Recovery and Restoration Actions, Critical Personnel Resources, Computing Needs, Communication Needs, and Relocation/Evacuation Procedures.

Branch locations included are as follows:

HAPEVILLE

ROSWELL

HAPEVILLE (SOUTH) BRANCH RECOVERY

The Hapeville (South) Branch is the Main Operations location for Family First Credit Union and recovery of this location is addressed earlier in this document. During recovery from a disaster event affecting other branch locations, this branch may be called on to assist with recovery as an alternate location since the branch is located in a geographically separated area from other Family First Credit Union branches.

Location

3604 Atlanta Ave., Hapeville, GA 30354

Alternate Location

Roswell (North) Branch: 1560 Holcomb Bridge Rd., Roswell, GA 30076

Rendezvous Point

Hapeville Police Department: 700 Doug Davis Dr., Hapeville, GA 30354

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN BRANCH	MINIMUM REQUIRED	RELOCATE TO	SUCCESSOR/CROSS TRAINED
CEO	1	1	Remote	EVP/CFO
EVP/CFO	1	1	Remote	COO
COO	1	1	Remote	CEO
CLO	1	1	Remote	VP of Real Estate Lending
Accounting Specialist	1	1	Roswell	Acct Clerk /New Hire
Accounting Clerk	2	1	Roswell	New Hire
Branch Manager	1	-	-	CLO
Member Service Reps	3	2	Roswell	Tellers
Head Teller	1	-	Roswell	Branch Manager
FT Teller	2	1	Roswell	Member Service Reps
PT Teller	1	-	-	temp or leave vacant
Call Center (FT, PT)	3	2	Roswell	other Call Center
VP of Compliance	1	1	Remote	Compliance Specialist
Compliance Specialist	1	-	-	new hire / leave vacant
Loan Officers	2	1	Roswell	Branch Manager
VP of IT	1	1	Remote	New Hire
IT Specialist	1	1	Remote	New Hire
VP of Marketing	1	1	Remote	CEO
Marketing Specialist	2	0	Remote	Outside Agency
Member Solutions Manager	1	1	Remote	CLO
Member Solutions Specialist (FT, PT)	3	1	Roswell	other MS Specialist
VP of Real Estate Lending	1	1	Remote	CLO / new hire

TOTAL FOR DEPARTMENT 32 19

HAPEVILLE (SOUTH) BRANCH RECOVERY (CONTINUED)

Additional (Empty) Workstations Available

4 – Board Room temporary workstation setup

Telecommunications and Internet Provider

AT & T

Back-up Power Source

NONE

ROSWELL (NORTH) BRANCH RECOVERY

The Roswell (North) Branch is overseen by the Branch Manager. During recovery from a general disaster event, this branch may be called on to assist with recovery in other areas of the Credit Union as an alternate location or critical systems recovery backup.

Should the disaster event be localized to this branch, recovery will focus on branch level needs, including teller and member services, and lending services. Recovery of operations for the Roswell Branch is crucial since the branch is located in a geographically separated area from other Family First Credit Union branches.

Location

1560 Holcomb Bridge Rd., Roswell, GA 30076

Alternate Location – for members

Hapeville Branch: 3604 Atlanta Ave., Hapeville, GA 30354
(Staff will work remotely)

Rendezvous Point

Tidal Wave Car Wash: 1564 Holcomb Bridge Rd., Roswell, GA 30076

CRITICAL RESOURCES

Personnel

TITLE	TOTAL IN BRANCH	MINIMUM REQUIRED	RELOCATE TO	SUCCESSOR/CROSS TRAINED
Branch Manager	1	1	Hapeville	Branch Manager (relocate from Hapeville)
Loan Officer	1	-	-	Branch Manager
MSR/Teller (FT, PT)	4	2	Hapeville	other MSR/Teller
Call Center (PT)	1	1	Hapeville	other Call Center
TOTAL FOR DEPARTMENT	7	4		

Additional (Empty) Workstations Available

8 – Lending/MSR cubicles
2 – Conference/Board Room

Telecommunications and Internet Provider

Spectrum

Back-up Power Source

NONE

PANDEMIC BCP PLAN

The 2020 update by the Federal Financial Institutions Examination Council (FFIEC) regarding the Interagency Statement on Pandemic Planning provides guidance to “remind financial institutions that business continuity plans should address the threat of a pandemic outbreak and its potential impact on the delivery of critical financial services.” The Board of Directors of Family First Credit Union and Management makes oversight of the Credit Union’s pandemic preparedness program a priority. In the worst-case situation of a full-scale pandemic in the United States, it is envisioned that staff of Family First Credit Union would operate critical systems and activities from home, where applicable. Detailed information regarding staffing and employee workplace policies should be deferred to the Family First Credit Union Management.

Basic Service

The Credit Union would remain focused on its key commitments:

- Operating to maintain member stability;
- Promoting the maintenance of a sound and efficient financial system; and
- Meeting the needs of members for access to cash (currency).

It is assumed that critical infrastructure of the country, such as water, power and communications, would continue to function.

Staff Safety

Underlying this strategy is a determination that the health and safety of staff would be a key objective.

At the discretion of the CEO and based upon best available information concerning pandemic health risks, the following actions may be taken as suggested by the CDC:

- All employees will be encouraged to wash their hands and use hand sanitizers frequently;
- Social distancing will be encouraged with the goal of maintaining a minimum distance of six feet between employees at all times;
- Employees will be encouraged to cover their nose and mouth with a tissue or handkerchief when coughing or sneezing;
- Shaking hands will be discouraged;
- Eating lunch at restaurants and other unnecessary trips outside the office will be discouraged. Employees will be expected to bring their own lunches and wash any utensils and containers at home;
- Daily health screening prior to reporting to work as recommended by CDC or local guidelines (temperature checks, screening questions, etc.);
- Employees may be prohibited from coming to work while ill, or while members of their household experience flu-like symptoms. If an employee begins to run a fever or feel ill while at work, they may be required to go home immediately and not return until symptom free (please refer to guidelines in the company sick policy).

- Current cleaning contracts will be reviewed to incorporate rigorous disinfection of common areas during daily cleaning as appropriate.

Supplies

Contingent upon the decision of the CEO, Family First Credit Union will purchase and maintain a stock of health protection supplies (as enumerated below) to be utilized by company teammates in the event of a (viral or bacterial) pandemic. The decision concerning the type and amount of supplies to be purchased, and when they should be utilized, shall be made by the CEO based upon the best available information concerning health risks posed by a pandemic.

The following items may be purchased at the discretion of the CEO for pandemic preparedness (quantity of supplies will be based on size of office):

- Liquid Hand Sanitizers
- Tissues
- Computer keyboard/mouse (to be sanitized frequently with chlorine solution)
- Bottled Water
- First aid kits
- Face/eye guards
- Medical gloves (non-latex)
- Sanitizer wipe/spray
- Biohazard waste bags

Communications and Telecommuting:

Family First Credit Union has designated the CEO as the primary owner of communicating information to teammates regarding the status of a pandemic outbreak, company procedures, compensation, etc. In the event the CEO is not available, the CFO will be responsible for or delegate these tasks.

- Initiate deployment of call list to communicate a pandemic has been declared and company status.
- Update emergency planning communications every 24 hours, and/or when changes occur. Information provided will include whether or not Family First Credit Union offices will be open, when telecommuting will be required, and directions for employees to access more information.
- In the event of a severe pandemic, some employees may be allowed/expected to work from home using the internet, email, telephone, and/or fax; subject to company policy regarding remote user access and controls. Transport of office equipment and supplies to employee's homes will be allowed at the discretion of the CEO and maintained in the home during the duration of the emergency. During this time, Family First Credit Union may facilitate conference calls on an as needed basis to help the CEO coordinate work being completed.

Family First Credit Union has designated the CEO as the primary owner of communicating information to the membership, such as accessibility, temporary hours, alternate access, etc.

Travel

During a pandemic, travel restrictions may be enforced by the federal government. Due to the importance of essential systems, these travel restrictions may need to be waived in order for Family First Credit Union employees to provide on-site technical assistance.

Credit Union Preparedness and Pre-Positioning

To assist staff with personal preparedness while at work, the Credit Union shall store medical and preventive supplies including but not limited to: face masks, medical gloves, hand cleanser, surface sanitizer wipe, surface sanitizer spray, eye shields, tissues, biohazard waste bags and other supplies needed to combat the pandemic.

Current cleaning procedures would be reviewed to incorporate rigorous disinfection of common areas during daily cleaning. Personal vigilance is the most effective means of minimizing the spread of infection so the Credit Union would encourage staff to have an annual influenza vaccination and promote respiratory hygiene/cough etiquette.

In times of crisis, history shows that there is a significant rise in demand for currency. There may also be a disruption or a delay with the Federal Reserve services. Whether this might occur during a pandemic is unknown. Given this uncertainty, the supply of cash will be increased above usual policy limits.

Event Matrix

See the threat levels and responses detailed below. Additional decisions for Pandemic events or crises that are centric to lack of human resources / staffing will be performed by the CEO. This assessment will be performed during the onset or immediately after the event, depending on the threat source.

To combat this possibility of a pandemic disaster, Family First Credit Union has developed the following strategy and a series of color-coded response stages.

- Stage One** – Plan for It (color code WHITE) with the objective of creating pandemic response action plans to reduce the health, social and economic impact of a pandemic.
- Stage Two** – Act and React (color code YELLOW) once a pandemic was declared, ongoing strategies would include:
- Stage Three** – Keep it Out (color code RED)
- Stage Four** – Stamp it Out (color code RED) if these strategies were not successful, the next strategy would be:
- Stage Five** – Manage It (color code RED)
- Stage Six** – Stand down – Recovery (color code GREEN)

EXECUTIVE DECISION MATRIX: PANDEMIC SCENARIOS

The following matrix would be used to determine the status of a pandemic and the subsequent actions required.

Stage	Code	Description	Action
1	WHITE (Information /Advisory) Planning	<ul style="list-style-type: none"> • No current outbreak of the 'flu pandemic' anywhere in the world • Preparedness planning and preparation under way 	<ul style="list-style-type: none"> • Complete planning and preparation • Maintain preparedness focus • Monitor national and international pandemic situation • Monitor Travel Advisory • Business as usual
2	YELLOW (Standby)	<ul style="list-style-type: none"> • No current outbreak of the 'flu pandemic' anywhere in the USA • Preparedness complete 	<ul style="list-style-type: none"> • Maintain preparedness focus • Monitor national and international pandemic situation • Monitor Travel Advisory • Business as usual
3	RED (Activation) (Keep it out)	<ul style="list-style-type: none"> • Influenza strain now human-to-human Contagious, with some employees possibly being infected • Isolated and contained incidents of contamination, or • Influenza pandemic officially declared • No vaccine available 	<ul style="list-style-type: none"> • Maintain preparedness focus • Ensure relevant departments can quickly move to next stage • Communicate to staff about preparedness and plans • Communicate to staff about personal preparedness • Action Containment Plans <ul style="list-style-type: none"> • Allow employees to work from home, if they are part of the remote workforce • Revoke travel to affected regions for work purposes • Review all other travel with possible blanket revocation • Review all pandemic plans • Monitor national and international pandemic situation • Business as usual
		Scenario Based Actions <ol style="list-style-type: none"> 1. Credit Union personnel out of town at time of outbreak, borders not closed <ol style="list-style-type: none"> a. Operate Credit Union with only essential personnel taking precautions to mitigate exposure to disease b. Delegate authority as required 2. Credit Union personnel out of town at time of outbreak, borders closed <ol style="list-style-type: none"> a. Ensure affected personnel have access to cash (credit card) b. Delegate authority as required 3. Rush on cash detected <ol style="list-style-type: none"> a. Arrange for extra cash deliveries b. Invoke overdraft and liquidity management plans 	

Stage	Code	Description	Action
4	(Stamp it out)	<ul style="list-style-type: none"> Influenza pandemic officially declared in the United States No vaccine available 	<ul style="list-style-type: none"> Action Status-Red Plans as per scenarios below Monitor national and international pandemic situation Action against rush on cash as above Delegate authority as required
		Scenario Based Actions 1. Pandemic <u>not</u> in the area, movement not restricted a. Invoke 'go home stay home' policy for staff arriving at work unwell b. Revoke all travel by credit union personnel for work purposes c. Communicate to staff about personal preparedness d. Review plan with staff e. Business as usual 2. Pandemic in the area, movement not restricted, schools etc. remain open a. Invoke 'go home stay home' policy for staff arriving at work unwell b. Revoke all travel by credit union personnel for work purposes c. Communicate to staff about personal preparedness d. Review plan with staff e. Business as usual 3. Government closes schools but national quarantine not invoked a. 1 and 2 above, plus b. Utilize personnel policy regarding leave to care for family c. Utilize 'personnel working from home' plan with business activity restricted to essential services 4. Government orders national quarantine of workforce a. All Action-Red plans fully operational b. Declare Status Red – Stage 4	
5	(Manage it)	<ul style="list-style-type: none"> Influenza pandemic officially declared Workforce / population quarantined Business Activity restricted to essential services only 	<ul style="list-style-type: none"> Monitor national and international pandemic situation Review activity based on scenarios below
		Scenario Based Actions 1. All resources available, all key personnel available a. Continue with Status Red-Stage 4 activity b. Monitor and review business activities c. Media releases/notifications as appropriate 2. All resources available, key personnel options becoming restricted a. Review business activities and revise b. Delegate authorities as required c. Media releases/notifications as appropriate 3. Some resource failures occurring, key personnel numbers variable a. Review business activities and revise b. Delegate authorities as required c. Media releases/notifications as appropriate	
6	GREEN (Stand down) (Recovery)	<ul style="list-style-type: none"> Population protected by vaccination Influenza pandemic officially declared over in Metropolitan area Business recovery required 	<ul style="list-style-type: none"> Monitor national and international pandemic situation Delegate authority as required Invoke Business Recovery Plans

STATUS RED: CRITICAL SYSTEMS AND ACTIVITIES

The Credit Union will limit direct contact between staff and members using a barrier or similar device to prevent the spread of the virus. We will limit physical contact by conducting business using face masks (when conducting transactions face-to-face), disinfecting members as they enter the building and encouraging staff to disinfect frequently. The Credit Union may allow flexible work hours (staggered shifts) for staff to observe any quarantine, travel or person-to-person contact required by the local authorities.

Transition Processes

Once the pandemic has reached Status Red, the following actions would be required by the Credit Union:

Currency

- Ensure sufficient cash is dispersed to arranged holding points

Building Services

- Close the building
- Operating in 'after hours' status
- Display signage at entries

Financial Services

- Process all outstanding accounts payable
- Process membership requests via internet, phone system or ATM
- Ensure website working properly

Communications

- Notify membership and media of credit union status as defined in this Business Continuity Plan

Human Resources

- Staff notification 'flexible worksites'
- Finalize staff contact lists

Pandemic Review

The CEO is responsible for the continued review of both the existing Pandemic Plan and employee training, but also keeping abreast on stages of Pandemic, threat levels, and new strains of viruses both nationally and internationally. This will be executed through the use of various media channels and other resources at the disposal of the Credit Union. The Pandemic Plan will be reviewed at least annually, and all future products, services, and technologies will take Pandemic needs into consideration.

Pandemic Alert Systems

Management at Family First Credit Union can monitor the following alert systems to obtain information regarding the threat and progression of a pandemic event:

Centers for Disease Control and Prevention (CDC)	http://www.cdc.gov/flu/
U.S. Department of Health and Human Services (HHS)	http://www.hhs.gov
World Health Organization (WHO)	http://www.who.int

Additional Pandemic References/Guidance

[FFIEC Interagency Statement on Pandemic Planning](#) (March 6, 2020 Press Release)

[NCUA Letters to Credit Unions](#): 06-CU-06; 08-CU-01; 09-CU-13; 10-CU-10

[CDC National Strategy for Pandemic Influenza](#)

[WHO \(World Health Organization\) Pandemic Phase Descriptions](#)

EMPLOYEE TRAINING

All staff should be trained in the business recovery process. This is particularly important when the manual processing is significantly different than those pertaining to normal operations. This training may be integrated with the training phase or handled separately. In the case of Family First Credit Union, employee training and cross-training is an ongoing initiative primarily as a result of their business model. It is recommended that ongoing operational cross-training initiatives include the following objectives to mitigate the risk of staff being unable or unavailable to service members.

Objectives of Employee Business Continuity Training

The agreed objectives and scope of the BCP Training activities are as follows:

OBJECTIVES:	
COMMUNICATION	
➤	Awareness by employees of the Business Continuity Plan and specific sections of the plan related to their role in recovery.
➤	Ensure employees are aware of the Succession Plan should their immediate supervisor/manager not be present.
➤	Employee knowledge of notification procedures from Credit Union management after a disaster event.
➤	Understanding by all employees of different evacuation procedures (fire, bomb threat, gas leak, etc.)
➤	Appropriate rendezvous/meeting locations for employees outside of their respective Credit Union buildings after a disaster event.
➤	Effective communication strategies for all employees for “marked as safe” after a disaster event occurring during business hours.
➤	Confidentiality of disaster event or by employees (employees know NOT to post on social media or speak to the Media/Press) unless they are the assigned Media Contact.
RECOVERY	
➤	Adequate cross-training of staff to execute critical functions within Recovery Time Objectives after a disaster event.
➤	Documented procedures refer to alternate processing methods for each department critical function.
➤	Ensure all employees know alternate methods of processing for member-based transactions.
➤	Employees understand they may be asked to assist other department(s) in a post-disaster environment.
EFFECTIVENESS	
➤	Validate the Plan by exercising key personnel, processes, and technology vulnerabilities.
➤	Evaluation of outcomes and necessary changes to the Plan based on impact of exercise and testing initiatives or live contingency events.

APPENDIX A: EMERGENCY EXPENDITURE REQUISITION FORM

(Submit the completed form to CEO or designee for review approval and processing.)

*****Use this form for securing property outside of predetermined spending limits.**

Requisitioned By: _____

Department/Department Code: _____

Date of Request: _____

Capital Item: _____

Project Purpose: _____

Projected Cost of Item/Payment Terms: (attach applicable quotes, etc.) *

Source of Purchase: (vendor contact information)

Expected Delivery Date of Purchase and Description of Terms of Sale: (delivery date, carrier, insurance, delivery location)

Requestor's Signature

Approval Signature

Purchase Order Number: _____

**ANY ADDITIONAL DOLLAR AMOUNTS OR ADDITIONAL EXPENDITURES
MUST BE SUBMITTED FOR APPROVAL TO CEO or CFO PRIOR TO PURCHASE OR CONTRACT.**

APPENDIX B: DAMAGED/SALVAGE INVENTORY

This form is to be used to assist in tracking Fixed Asset inventories that are destroyed, displaced, or moved as the result of Disaster Declaration. Please include details (such as asset tag (if applicable), make, model, serial numbers, etc.) so that any damaged, moved or missing equipment is properly accounted for and tracked. In the event of total loss, this inventory will allow for the proper and appropriate disposal of the assets for tracking, accounting and tax purposes.

In the event of destruction or loss of technical equipment that does or may contain Sensitive Member Information (SMI), it is imperative that such equipment is properly sanitized (data removed or deliberately destroyed) in accordance with any corporate equipment retirement/disposal procedures.

Collateral Inventory
The following list of collateral items is stored at:

(Name, Address, and Contact numbers for location items are being stored at)

1.

2.

3.

4.

5.

6.

7.

8.

9.

10.

11.

12.

APPENDIX C: MEDIA / PRESS RELEASE FORM

In the event the act or event that has caused Family First Credit Union to invoke a formal Disaster Declaration, the CEO or the succession plan designated in this plan will determine if a Media / Press Release is required. If so, the following template should be used:

Contact: **[Contact Name]**

Title: **[Contact Title]**

Telephone: **[(###) ###-####]**

Fax: **[(###) ###-####]**

Email: **[email address]**

FOR IMMEDIATE RELEASE:

Family First Credit Union Continues Operations after Disaster
[City], [State], [Date] –

Family First Credit Union suffered **[disaster]** at their office located at **3604 Atlanta Ave., Hapeville, GA 30354**. The building, which houses computer operations, incurred extensive damage. The Credit Union is currently relocating operations to the office located at: **TBD** and expects to be completed by **[Date]**. Members can receive service through electronic channels (ATM, Online Banking) or at other Family First Credit Union locations until the damaged office is repaired. Please check Family First Credit Union website regularly for updates.

Alternate Operating Location:

Roswell Office, 1560 Holcomb Bridge Rd., Roswell, GA 30076

APPENDIX D: OVERSIGHT OF THIRD-PARTY SERVICE PROVIDERS (TSP'S)

*** Family First Credit Union utilizes a Vendor Management Program maintained through TD Consulting Corporation, Woodruff, SC for oversight of third-party service providers. See TDC Services vendor management system maintained by the Family First Credit Union Compliance Department for documentation.

APPENDIX E: EMPLOYEE LIST AND BOARD ROSTER

***Updated employee and board contact list are located with the Executive Management

APPENDIX F: IMPORTANT WEBSITES

*** Family First Credit Union utilizes a Vendor Management Program maintained through TD Consulting Corporation, Woodruff, SC. All vendor documentation will be stored in the vendor management system. A detailed vendor contact list will also be stored on the FFCU network: O:\Compliance\Third-Party Vendor Management\FFCU Third Party Vendor List

The list can also be retrieved directly from the Vendor Management System.

APPENDIX G: HARDWARE AND SOFTWARE INVENTORY

***Hardware and Software Inventory Master documentation is located on the FFCU network:

O:\IT\I\INVENTORIES

APPENDIX H: VENDOR LIST

*** Family First Credit Union utilizes a Vendor Management Program maintained through TD Consulting Corporation, Woodruff, SC. All vendor documentation will be stored in the vendor management system. A detailed vendor contact list will also be stored on the FFCU network: O:\Compliance\Third-Party Vendor Management\FFCU Third Party Vendor List

APPENDIX I: EMERGENCY SERVICES CONTACTS

Based on the resulting conditions directly post-event, the following external emergency service specialists should be contacted as appropriate in the event of a disaster situation. Please refer to the Credit Union's organization chart for details of authorized persons.

NAME OF EMERGENCY SERVICE	CONTACT DETAILS	TITLE OF CU STAFF RESPONSIBLE FOR CONTACTING EMERGENCY SERVICE
		NAME
Fire Department	911 / Hapeville Fire Dept. 3468 N. Fulton Ave. Hapeville, GA 30354 404-669-2141	See succession plan contained in this document
Local Police Department	911 / 700 Doug Davis Dr. Hapeville, GA 30354	See succession plan contained in this document
Fire & Water Damage/Restoration	Servpro of South Atlanta 4301 Fambrough Dr., STE 1 Powder Springs, GA 30127 404-505-1760	See succession plan contained in this document
F.B.I.	478-745-1271	See succession plan contained in this document
Poison Control	911 / GA Poison Control 800-222-1222	See succession plan contained in this document
Local Hospital or Medical Center	Wellstar Atlanta Medical Center South 1170 Cleveland Ave. East Point, GA 30344 404-466-1170	All team members impacted by the disaster/emergency event
Human Emergencies/Crisis Intervention	Odyssey Family Counseling Center 1919 John Wesley Ave. College Park, GA 30337 404-762-9190	All team members impacted by the disaster/emergency event

Utility Notification – See Vendor List for detailed contact information

Many emergencies may affect the various utilities of the Credit Union. Each emergency situation should be evaluated as to its effect on utilities, such as broken water or gas pipes, loss of electrical power, etc. Upon the loss of a vital utility, a member of the BCP Team will contact the appropriate utility company and provide the following information:

- 1) Company name & address
- 2) Account or Customer number
- 3) Phone number where you can be reached
- 4) Your name
- 5) Detailed description of the problem