

# **Family First Credit Union**

## **Pandemic Influenza Preparedness and Response Policy**

### **General Policy Statement:**

The purpose of this policy is to set forth the guidelines for Management and staff to use in establishing and maintaining policies and procedures to prepare and respond to the onset of a potential influenza pandemic.

### **Guidelines:**

- (1) **The role of the Board of Directors.** The Board of Directors will (1) approve the credit union's written Pandemic Influenza Preparedness policy and program; and (2) oversee the development, implementation, and maintenance of the Credit Union's program, including assigning specific responsibility for its implementation.
- (2) **The role of the Management Team.** The management will do the following:
  - A. Oversee the development and implementation of the Influenza Pandemic Preparedness program;
  - B. Draft procedures to ensure compliance with the program;
  - C. Monitor, evaluate and suggest adjustments to the program;
  - D. Ensure staff is trained on these issues;
  - E. Ensure the program is regularly tested and remains relevant to the scope and complexity of the Credit Union's operations.
  - F. Brief the Board of Directors of the Credit Union at least annually on the status of the program;
  - G. Monitor national and international pandemic news sources to be aware of potential outbreaks;
  - H. Identify key points of contact for emergency and health care organizations; and
  - I. Assess the potential implications for the Credit Union if a pandemic occurs.
- (3) **Planning for Impact to Credit Union Operations.** The Credit Union will take actions to ensure the Credit Union is prepared for the impact to its operations in the event of an influenza pandemic.
  - A. **Pandemic Coordinator.** The Credit Union will identify a Pandemic Coordinator and team with defined roles and responsibilities for preparedness and response

planning.

- B. **Essential Employees and Supplies.** The Credit Union will identify essential employees and other critical supplies that are required to maintain business operations by location and function during a pandemic. To ensure resiliency, the Credit Union will cross-train employees to perform the essential functions.
- C. **Essential Business Functions and Processes.** The Credit Union will assess and prioritize essential business functions and processes that may be affected by a pandemic.
- D. **Core Business Activities.** The Credit Union will determine whether its core business activities can be sustained over several weeks with, potentially, only a minimal workforce available.
- E. **Demand Preparedness.** The Credit Union will develop and plan scenarios likely to result in an increase or decrease in demand for its products and services during a pandemic (i.e., need for hygiene supplies, restricting mass gatherings, cash)
- F. **Financial Impact Projections.** The Credit Union will determine the potential impact of a pandemic on Credit Union financials, using multiple possible scenarios that affect different product lines and branch sites.
- G. **Service Provider Plans.** The Credit Union will evaluate the plans of critical service providers for operating during a pandemic. When possible, the Credit Union will implement a back-up arrangement to mitigate risk, with special attention to be directed at the Credit Union's ability to access leased premises and whether sufficient Internet access capacity is available if telecommuting is a key risk mitigation strategy.
- H. **Up-To-Date Information.** In the event of influenza, government health officials will issue information and warnings on how to avoid becoming ill. The Credit Union will pay close attention to the guidance provided by local and state health departments and the U.S. Centers for Disease Control and Prevention (<http://www.cdc.gov>), and the federal government's consolidated flu website (<http://www.flu.gov>).
- I. **Emergency Communications Plan.** The Credit Union will establish (and revise when necessary) an emergency communications plan which will include identification of key contacts (with back-ups), chain of communications (including vendors and members), and processes for tracking and communicating business and employee status.
- J. **Testing.** The Credit Union will implement (and revise when necessary) an exercise/drill to test the plan.

- (4) **Planning for Impact to Employees and Members.** The Credit Union will take actions to ensure the Credit Union is prepared for the impact to its employees and members in the event of an influenza pandemic.
- A. **Employee Absences.** The Credit Union will forecast and allow for employee absences during an influenza pandemic, due to factors such as personal illness, family member illness, community containment measures and quarantines, school and business closures, and public transportation closures.
  - B. **Personnel Policy Modifications.** The Credit Union will modify its personnel policies to cover employee compensation; non-punitive sick leave absences; what to do for employees who have exposed, or are suspected to be ill with, pandemic influenza; determining when a previously ill person is no longer infectious and can return to work; telecommuting; and flexible work hours in the event of an influenza pandemic.
  - C. **Contact Modifications.** The Credit Union will implement guidelines to modify the frequency and type of face-to-face contact among employees and between employees and members (i.e., hand-shaking, seating in meetings, office layout, shared workstations).
  - D. **Vaccinations.** The Credit Union will encourage and track annual influenza vaccination for employees.
  - E. **Health Care Services.** The Credit Union will evaluate employee access to and availability of healthcare services (including mental health and social services) during a pandemic, and improve those services as needed.
  - F. **Special Needs Employees.** The Credit Union will identify employees and key members with special needs and will incorporate the requirements of such persons in its preparedness plans.
- (5) **Allocation of Resources to Protect Employees and Members during an Outbreak.** The Credit Union will take measures to protect its employees and members during an outbreak of pandemic influenza.
- A. **Infection Control Supplies.** The Credit Union will plan for and provide sufficient and assessable infection control supplies in its main office and all of its branches (i.e., hand-hygiene products, tissues and receptacles for their disposal).
  - B. **Information Technology Infrastructure.** The Credit Union will enhance its communications and information technology infrastructure as needed to support employee telecommuting and remote member access.
- (6) **Educating Employees.** The Credit Union will develop and disseminate programs and materials covering pandemic fundamentals (i.e., signs and symptoms of influenza, modes of transmission), personal protection and response strategies (i.e., hand hygiene,

coughing/sneezing etiquette, contingency plans), and the Credit Union's pandemic preparedness and response plan.

(7) **Program Testing.**

- A. **Structure.** Management will develop a testing program that will provide a high degree of assurance that critical business processes, including supporting infrastructure, systems, and applications, will function even during a severe pandemic.
- B. **Elements.** Testing will include the following elements:
  - a. Roles and responsibilities of management, employees, key suppliers and members;
  - b. Key pandemic planning assumptions;
  - c. Increased reliance on online banking, telephone banking and call center services; and
  - d. Remote access and telecommuting capabilities.
- C. **Test results.** Test results will be recorded and reported to management (if delegated) and the board. All appropriate updates will be made to the program and test.

**Review**

The Pandemic Preparedness and Response Policy must be reviewed at least annually by the Board of Directors.

Adopted \_\_\_\_\_ Date\_\_\_\_\_

Reviewed\_\_\_\_\_ Date\_\_\_\_\_