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RP10 – Recovery Procedures Pandemic Influenza

Policy Statement

The institution understands its role in the preparation for, detection of, and response to an outbreak of any infectious disease—such as, in this particular case, pandemic influenza—as defined in the [National Strategy for Pandemic Influenza](#) (Homeland Security Council; November 1, 2005).

The institution also recognizes its responsibility to take all realistic precautions to help prevent the spread of any influenza virus—during both the regular flu season and at times of potential/declared pandemic outbreaks in order to ensure the continuity of critical business operations, safeguard assets, and protect the health of its employees, customers/members, and surrounding community.

Therefore, it is the policy of the institution to maintain and enforce preventative, protective, and response-specific procedures for any viral outbreak—including both seasonal and pandemic influenza—by:

- Establishing an ethic of infection control in the workplace.
- Maintaining a business continuity strategy to ensure the delivery of essential goods and services during times of significant and/or sustained worker absenteeism.
- Making provisions, whenever possible, for staff to work remotely should public health officials advise against non-essential travel outside of the home.
- Establishing partnerships within the community to provide mutual support and continuity of essential services during a pandemic.
- Reviewing and approving this policy and supporting procedures, at least, annually.

Purpose & Objectives

This policy is in place to help lessen the impact of both seasonal and pandemic influenza outbreaks on the institution’s employees, customers/members, and surrounding community. Portions or all of the policy and its supporting procedures may also be applicable to similar viral outbreak scenarios.

Scope

Applies to all personnel/departments and the Board of Directors/Trustees.

Supporting Policies & Procedures

Portions of the institution’s existing Business Continuity Plan and supporting data/documentation address critical components of pandemic influenza-specific preparedness and response requirements (as described below) and should be followed—as deemed appropriate by the institution’s leadership—should a pandemic influenza-related emergency be declared. Documentation referred to below should be accessible via the institution’s BCP-CD, copies of which should be stored at all institution locations and disaster recovery hotsites, as well as with all key personnel.

- **Pandemic Coordinator & Team** | The BCP Manager and BCP Management Team (as defined in the institution’s then-current business continuity plan document) should assume the role of Pandemic Coordinator and Response Team, respectively.
- **Risk Assessment** | The institution has conducted and should periodically review/update its Threat/Risk Assessment worksheet to evaluate and determine the probability of occurrence and potential impact of many catastrophic events, including pandemic influenza outbreak.
- **Business Impact Analysis** | The institution has conducted and should periodically review/update its Business Impact Analysis to determine the internal/external resources, vendors/service providers, operations/functions, facilities, data, documentation, and supplies most critical to its ability to maintain business operations.

- **Loss of Workforce** | *Appendix A* of the institution's Business Continuity Plan document contains detailed emergency response procedures for a number of scenarios, including those for loss of workforce, delivery malfunction, and transportation disruption.
- **Emergency Communications Planning** | The institution's Business Continuity Plan and supporting data/documentation include a detailed emergency notification procedure, including Telephone Tree and Recall Roster reports for the notification of internal and external resources during an emergency, as well as procedures for maintaining communications and disseminating information to employees and customers/members throughout the emergency response process.
- **Hotsite Activation/Emergency Operations** | The institution's Business Continuity Plan and supporting data/documentation address authorities, scenarios, and procedures for conducting operations and activating hotsites in the event of the closing or inaccessibility of its main office and/or branch location(s).
- **Employee Health Services** | The institution's Business Continuity Plan and supporting data/documentation cover the provision of physical and mental health services for employees and/or customers/members in the event of an emergency.
- **Pandemic Influenza Response Testing** | Testing of the institution's Pandemic Influenza Policy and supporting procedures should be addressed and included as part of its annual BCP risk monitoring policies and procedures, as defined in the Business Continuity Plan document.

The following pandemic influenza-related considerations should be addressed in other institutional policies and procedures:

- **Sick Leave Policies** | The institution should maintain a policy covering sick, short-term, and/or long-term disability leaves of absence for employees and insurance coverage to ensure the continuation of employee compensation and benefits during such times, as deemed appropriate.

Special Considerations

Should any state, local, or federal agency declare a pandemic influenza-related State of Emergency for an area in which any/all of the institution's facilities are located, the institution should work under the direction of that agency to support the regional, national, and/or global disaster recovery effort, which—in most cases, and according to all applicable laws and regulations—would supersede the provisions set forth in the institution's Business Continuity Plan, including this Pandemic Influenza Policy and supporting procedures.

Responsibilities & Authority

The following details the responsibilities and authority that various internal/external resources have in upholding the purposes and objectives of this Pandemic Influenza Policy:

BOARD OF DIRECTORS/TRUSTEES is responsible for:

- Reviewing and approving the institution's Pandemic Influenza Policy and applicable supporting procedures, as required.
- Keeping up-to-date with changes to FFIEC regulatory guidelines and the [National Strategy for Pandemic Influenza](#) (Homeland Security Council; November 1, 2005) to ensure that this policy and applicable supporting procedures remain in compliance with requirements for the preparation for, detection of, and response to pandemic influenza outbreaks.
- Reviewing and approving the institution's Business Continuity Plan, portions of which will be used to support the provisions set forth in this policy and supporting procedures.
- Distributing pandemic influenza-related policies and procedures to government agencies, correspondent institutions, and/or **shareholders**, as required.
- Maintaining all related and/or applicable supporting policies and procedures (e.g. sick leave, health benefits, short-term disability insurance coverage) to ensure compliance with pandemic influenza-specific FFIEC requirements.

BCP MANAGER is responsible for:

- Developing and maintaining the institution's Pandemic Influenza Policy and applicable supporting procedures.
- Updating this policy and applicable supporting procedures in accordance with changes to FFIEC regulatory guidelines and the [National Strategy for Pandemic Influenza](#) (Homeland Security Council; November 1, 2005), in a timely manner.
- Securing approval for this policy and applicable supporting procedures from the Board of Directors/Trustees, as necessary.
- Developing and maintaining a comprehensive, viable Business Continuity Plan, portions of which will be used to support the provisions set forth in this policy and supporting procedures.
- Distributing pandemic influenza-related policies and procedures to government agencies, correspondent institutions, and/or the Board of Directors/Trustees, as required.
- Establishing and maintaining relationships with healthcare providers, insurers, local healthcare facilities, public health agencies, emergency responders, and other applicable organizations in the community to coordinate pandemic influenza planning and response efforts.

Phase I : Risk Reduction, Prevention & Intervention

In order to reduce the risk and prevent the spread of infectious diseases—including influenza viruses—within the workplace, Senior Management and/or the Board of Directors/Trustees should:

- Post signs and/or conduct training sessions to educate employees about the signs and symptoms, modes of transmission, and prevention of the spread of the influenza virus in the workplace and at home.
- Encourage employees to receive annual influenza vaccinations by posting reminders in conspicuous locations throughout all facilities that contain a reminder to schedule an appointment with their primary care physician and any available, additional information that may be helpful in accomplishing this goal (e.g. where/when free vaccinations are available in the community, flu prevention hotline info).
- Provide financial assistance to employees unable to afford vaccinations, as deemed necessary/appropriate.
- Promote and educate employees about proper workplace hygiene (e.g. cough/sneeze etiquette, limiting frequency and type of physical contact with employees and customers/members, keeping work areas clean and orderly).
- Provide sufficient and accessible infection control supplies (e.g. hand-sanitizing products, tissues, hygienic disposal receptacles, antibacterial soap) at all facilities for both employees and customers/members.
- Ensure janitorial service providers regularly disinfect and use antibacterial products to clean areas in common spaces (e.g. bathrooms, lobby, kitchen areas/appliances) and/or shared workplace equipment (e.g. teller stations, telephone receivers, seats, computer keyboards/mouses, printers), as applicable.
- Encourage and/or require employees who have been exposed to, are suspected to be ill, become ill, and/or exhibit symptoms of infection to stay home—and, as deemed necessary/appropriate, make arrangements for them to work remotely and provide all necessary resources (e.g. procedures, laptops, data, forms) to do so—until risk of infecting others is determined to be eliminated.
- Make it clear to employees that they will not, under any circumstances, be fired or otherwise jeopardize their employment should they take time off /sick leave to prevent the spread of the influenza virus to others, unless their claim to be sick/infected is proven through proper legal channels to be intentionally fraudulent.
- Give a copy to and/or ensure employees understand the institution's Pandemic Influenza Policy and procedures.

Phase II : Pandemic Influenza Response

At the first sign of a regional influenza outbreak, the institution should monitor the situation via available information channels (e.g. TV and radio broadcasts, the Internet, reports from government/health agencies) to determine the level of threat to operations at its main office and/or branches, as well as the health of its employees and customers/members. Should the outbreak escalate to the point the institution feels it poses a significant threat, Senior Management and/or the Board of Directors/Trustees should:

- Immediately help prevent the spread of infection by determining the need and degree to which:
 - Prophylactic materials (e.g. latex gloves, surgical masks, hand sanitizers) should be distributed and used at any/all branches.
 - Access to lobbies at any/all branches should be restricted to the public/employees.
 - Access to drive-up windows at any/all branches should be restricted to the public/employees.
- Determine if the minimum staff required to support operations at any/all facilities (as defined in the institution's CAPlus "Personnel" reports/BCP document) is available/uninfected and forecast availability throughout the expected duration of the outbreak.
- If, at any time, it is foreseen/determined that minimum staffing requirements (as defined in the institution's CAPlus "Personnel" reports/BCP document) cannot be met, evaluate what work can be done remotely (e.g. employees' homes, alternate sites) and re-assign locations/tasks accordingly, providing all necessary resources (e.g. procedures, laptops, passcodes, data, forms) to employees working remotely in the most secure, expeditious way possible and/or implement the "Loss of Workforce" emergency response procedure in *Appendix A* of the institution's Business Continuity Plan document, as deemed necessary.
- Work with communications and IT providers to ensure adequate support and security related to increased traffic to the network due to employee work functions and/or customer/member transactions being conducted remotely.
- Determine the need for and establish temporary policies, as necessary, to restrict employee travel to affected geographic areas (both domestic and international), evacuate employees working in or near affected areas, and/or the re-introduction of employees returning from affected areas into the workplace (according to then-current CDC travel recommendations).
- Use available media/communications channels to inform customers/members of changes to banking hours, facilities access, locations, and/or availability of services at any/all branches and provide instructions for alternate means/locations to complete transactions normally conducted at any/all closed branches (e.g. correspondent institutions, ATMs).
- Ensure employees, customers/members, **shareholders**, and the surrounding community are made aware of how the institution is handling the situation.
- Continue to monitor the situation via available information channels (e.g. TV and radio broadcasts, the Internet, reports from government/health agencies).
- Document the details of all actions taken during the response effort (e.g. communications channels used, exactly what/degree to which parts of the business continuity plan were activated, community resources/government agencies consulted, etc.).

Phase III : Post-Pandemic Influenza Assessment

The institution should review all documentation of actions taken during [Phase II : Pandemic Influenza Response](#) in order to determine the effectiveness of its pandemic influenza-specific and all related policies/procedures (including its Business Continuity Plan). Any policies, procedures, data, and documentation determined to be unrealistic, ineffective, or otherwise inadequate, should be modified and updated accordingly.

Required Materials

The following documentation and/or materials are required in order to properly execute this procedure.

Document/Item	# Req'd	Storage Location
BCP-CD → includes all required reports and supporting documentation	-	See "Business Continuity Plan" document for storage locations.
Surgical Gloves/Masks	TBD	Will be purchased/acquired, as necessary.
Infection Control Supplies (e.g. antibacterial soap, tissues, hand-sanitizers)	-	Currently available at all facilities. Additional supplies will be purchased/acquired as deemed necessary during an outbreak.

Additional Resources

The institution should refer to the following resources during the planning, response, and post-response assessment phases of pandemic influenza outbreak efforts, as deemed appropriate.

U.S. Department of Homeland Security (DHS): <http://www.dhs.gov/dhspublic/>

National Strategy for Pandemic Influenza: <http://www.whitehouse.gov/homeland/pandemic-influenza.html>

U.S. Department of Health & Human Services (DHHS): <http://www.dhhs.gov/>

National Vaccine Program Office: <http://www.dhhs.gov/nvpo/pandemics/index.html>

Pandemic and Avian Flu Website: <http://www.pandemicflu.gov/>

Pandemic Influenza Planning Checklist (PDF): <http://www.pandemicflu.gov/plan/pdf/businesschecklist.pdf>

World Health Organization (WHO): <http://www.who.int/>

Epidemic and Pandemic Alert and Response (EPR): <http://www.who.int/csr/>

Avian Influenza Website: http://www.who.int/csr/disease/avian_influenza/en/

Centers for Disease Control & Prevention (CDC): <http://www.cdc.gov/>

Avian Influenza Website: <http://www.cdc.gov/flu/avian/index.htm>

U.S. Department of Labor (OSHA): <http://www.osha.gov/>

Avian Flu Guidance: <http://www.osha.gov/dsg/guidance/avian-flu.html>

U.S. Department of State: <http://travel.state.gov/>

Avian Flu Fact Sheet: http://travel.state.gov/travel/tips/health/health_1181.html

U.S. Agency for International Development (USAID): <http://www.usaid.gov/>

Avian Influenza: http://www.usaid.gov/our_work/global_health/home/News/news_items/avian_influenza.html