Pandemic Response Policy

Description

This Pandemic Response Policy (Policy) discusses the manner and format in which [[CUName]] (Credit Union) will prepare for and respond to the threat of a national pandemic (see Appendix A for more information) that causes serious widespread illness.

Purpose

It is the policy of the Credit Union, as determined by the Board of Directors (Board), in constructive partnership with the Chief Executive Officer (CEO) and members of the management team (together, Management), to promote a safe and healthy environment for its employees and its members. To that end, this Policy has been created by the Board and Management in an effort to minimize exposure and absenteeism in the event that a pandemic is a threat to our employees and their families, our volunteers and our members and the business overall.

The purpose of this Policy is to address the following issues related to pandemics:

* Creating a culture of prevention or infection control in the workplace that is reinforced during the annual influenza season and during other outbreaks, to include, if possible, options for working remotely while ill, systems to reduce infection transmission, communications with employees, volunteers, members and suppliers and employee education. This also included providing appropriate hygiene training and supplies for employees and members as appropriate. This will reduce the likelihood that the Credit Union’s operations and its employees, volunteers and members will be significantly affected by an outbreak or a pandemic event.
* The ability to scale this Policy and a resulting implementation plan to a widening outbreak or pandemic so that they are consistent with the effects of a particular stage of a pandemic outbreak. Such a plan should also include elements that pave the way for re-entering employees into the workplace.
* Establishing contingency plans and a framework of facilities, systems and procedures to maintain delivery of services during times of widespread and sustained worker absenteeism. This may include social distancing, telecommuting, redirecting members from branch to electronic banking or drive-through services or conducting operations from alternative sites. This should consider the impact of member needs re: online and remote banking, ATMs and call centers, as well as actions made by public health and government authorities that could impact the Credit Union’s business operations.
* Where possible, establishing mechanisms to allow workers to provide services from home if public health officials advise against non-essential travel outside the home.
* Establishing partnerships with other members of the financial community to provide mutual support and maintenance of essential services during a pandemic.
* Ensuring that adequate financial resources are allocated to support this Policy.
* Identify legal and regulatory requirements for the Credit Union’s business functions and processes vis-à-vis operating during a pandemic.

Responsibilities

A group of management-level and other appropriate staff will be assigned to a Crisis Management Team. The members of the Crisis Management Team will be expanded to include at least one person from each Credit Union department,[[1]](#footnote-2) including at least one person from each branch. The CEO will act as the Coordinator of the Crisis Management Team, and the Coordinator will be kept current on all Credit Union emergency procedures.

It is the duty of the Coordinator to:

* Recommend any changes to the Policy as circumstances warrant and ensure that the Policy is reviewed by the Board every two years.
* Conduct employee training related to this Policy.
* Communicate with public health agencies, emergency responders and others regarding this policy, and understand their capabilities should an outbreak occur.
* Attend external training/seminars about pandemics to remain current about the pandemic threat in our community.
* Implement this Policy should it become necessary and provide updates to the management team and the Board on a regular basis.

Crisis Management Team members will have the following responsibilities:

* Assist the Coordinator in developing a document that identifies which employees, vendors, suppliers and systems are essential to maintaining operations at their locations.
* Update a disaster recovery application to ensure it may be used effectively during an outbreak.
* Identify and communicate to the Coordinator the names of possible ancillary personnel who could perform certain job duties in the case of a pandemic (e.g. consultants, temporary work services, retired employees).
* Assist the Coordinator in developing an emergency communications plan for all departments/locations, including identification of key personnel, vendors, and customers.
* Develop and submit a plan to continue operations at their locations with the smallest possible number of staff (see below).
* Ensure that all employees in their departments are adequately trained on emergency procedures in the case of a pandemic and in the prevention of illness.
* Encourage all employees to be vaccinated annually for influenza.
* Assist the Coordinator in the implementation of this plan, if necessary, at their locations.

Planning for Impact on the Credit Union

At least annually prior to the influenza season, the Coordinator will begin to prepare for an illness outbreak event, should one occur. He/she will take the following steps to plan for an impact on the Credit Union:

* Provide information to all employees regarding those practices that are recommended by public health officials to reduce the spread of the infection. He/she will monitor issues and information related to pandemics to keep this policy up to date.
* Develop a list of recommended infection control supplies (hand soap, hand sanitizer, tissues, disposable gloves, trash can liners, etc.) and ensure that each Credit Union location has a sufficient supply of them.
* Maintain a list of duties and positions for which individual employees are cross-trained within the credit union. Should staffing levels drop due to an outbreak, supervisors will use this list to fill in positions where needed. Succession plans should also be in place for C-Suite executives.
* Develop and maintain a list of duties that employees can perform from home, as well as any equipment (such as laptops, computers and cell phones) that may be necessary to perform those duties. Supervisors can then draw on this list to have those duties performed by employees from home should it become necessary.
* Recommend to the CEO an emergency sick leave policy to be adopted in the event of a pandemic. The policy is to be non-punitive and require employees who have been exposed or who exhibit symptoms of the illness to remain at home.
* Ensure that the Credit Union has sufficient information technology infrastructures, in partnership with the Vice President of Technology, to support employee telecommuting and remote access to Credit Union services.
* Establish the following policies and procedures, in partnership with the Vice President of Human Resources:
* Deploy employee protection strategies, including those promoted by public health officials, including hygiene, social distancing, etc.;
* Implement flexible work hours, including staggered work hours and telecommuting
* Restrict employee travel to affected areas;
* Officer guidance for employees returning to the U.S. from affected areas;
* Provide counseling services for all employees and their families, particularly those affected by illness;
* Put into place special procedures/accommodations for employees and members with special needs or disabilities.
* At least annually, review the legal and regulatory requirements with the Credit Union’s legal counsel for operating during a pandemic.
* Develop a communication plan to keep employees informed of incidents as they may occur, including those employees who remain at home. This would include plans to update information to include home e-mail addresses, telephone numbers for employees to call to receive recorded messages, pages on the website for employees and so on. The communication plan must also include procedures for responding promptly to employees’ questions about such issues as whether to report for work and special hours of operations during an outbreak.

Executing the Plan Should a Pandemic Occur

Should a pandemic occur, the Coordinator will, after consultation with Management, the Board and local, state and national health officials, implement the following steps, as deemed necessary:

* Estimate any projected “down-time” for Credit Union operations given the pandemic’s impact.
* Encourage/require[[2]](#footnote-3) the use of remote facilities (i.e., drive-through and ATM services only). The staffing of these services is to be increased as necessary to ensure that members using them receive prompt service and response so they will continue to use them.
* Contract for additional, deep cleaning of all Credit Union facilities.
* Purchase extra quantities of any necessary supplies (such as hand soap, hand sanitizer, tissues, disposable gloves, trash can liners, etc.) are obtained. This may also include additional materials and technology to support telecommuting employees.
* Employees with job duties that can be accomplished by telecommuting will be encouraged/required to work from home unless they have been cross-trained to work in place of an employee who is ill.
* The emergency sick leave policy will be implemented. Managers will be instructed to send and keep employees home if they exhibit symptoms of the illness, working from home if practical.
* Team members will contact their key vendors and critical service providers to determine the impact of the outbreak on their operations and its effects on our ability to perform our daily functions, and they will communicate the results to the Coordinator. Develop back-up plans to mitigate any risk.
* The Coordinator, with the assistance of team members, will monitor staffing levels at all locations and assist supervisors in finding ways to maintain critical operations in light of any staffing shortage. Should the closing of any locations be a consideration due to inadequate staff availability, the Coordinator will first contact the CEO to obtain his/her advice and consent prior to any closing. Should an office or branch be closed, notices shall be posted prominently at the location and on the website informing members of the situation and telling them where and how they can transact business. Telephone and other lines of communication will be routed through the communications center so members’ attempts to reach the Credit Union do not go unanswered.
* The Coordinator will implement an employee contact plan to ensure that all employees are kept informed of developments as they occur, including employees who remain at home.
* The Coordinator will ensure that members and potential members are kept informed of any changes that may affect their transaction of business with the Credit Union. This information will be included on the home page of the Credit Union’s website, in the lobbies of the headquarters location and branches, on the phone system and in other media as appropriate.
* Consider new Credit Union products that may support members during the pandemic, such as low interest rates, little to no down payment requirements, reduced restrictions on skip-a-payment loan programs, etc.
* Regularly appraise the Board and Management as to the implementation of the Policy and its effect.

Testing Our Policy

The Coordinator will call for and oversee random exercises at all locations semi-annually to test the effectiveness of the pandemic plan.

An annual assessment of the Pandemic Response Policy will be conducted by the Risk Management Officer with findings and management responses for updates to the Policy submitted to the Board.

Board Authorization

This Pandemic Response Policy (Policy) was approved by the Board at a meeting dated: \_\_\_\_\_\_\_\_\_\_\_. This Policy will be reviewed by Board every two years.

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For assistance or more information, contact us at: jennie@quantumgovernance.net.

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Resources: Federal Financial Institutions Examination Council, NCUA, NRL Federal Credit Union

Attachment A: *Pandemic Information*

A pandemic is a global disease outbreak. A pandemic occurs when a new virus or disease emerges for which people have little or no immunity and for which there is no vaccine. The disease spreads easily from person-to-person, causing serious illness; a pandemic can sweep across the country and around the world in a very short time.

**Differences: Seasonal Episodes of Diseases and Pandemics**

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| **SEASONAL**  | **PANDEMIC**  |
| Outbreaks follow predictable seasonal or social patterns  | Occurs rarely (three times in 20th century – last in 1968) |
| Usually some immunity built up from previous exposure | No previous exposure; little or no pre-existing immunity |
| Healthy adults usually not at risk for serious complications; the very young, the elderly and those with certain underlying health conditions at increased risk for serious complications | Healthy people may be at increased risk for serious complications; high risk groups: pregnant women, persons 65 or older, persons with a compromised immune system or an underlying chronic condition |
| Health systems can usually meet public and patient needs | Health systems may be overwhelmed |
| Vaccine may not have been developed, has had history of administration to affected groups or is based on known strains of the disease  | Vaccine probably would not be available in the early stages of a pandemic |
| Adequate supplies of appropriate drugs for treatment are usually available | Effective doses of appropriate drugs may be in limited supply |
| Generally causes modest impact on society, e.g. some school closing, encouragement of people who are sick to stay home | May cause major impact on society, e.g. widespread restrictions on travel, closings of schools and businesses, cancellation of large public gatherings |
| Manageable impact on domestic and world economy | Potential for severe impact on domestic and world economy |
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Symptoms

The symptoms of pandemic disease may depend on which virus/bacteria caused the infection and the severity of the individual reaction to the infecting organism. Once a pandemic hits, the U. S. Federal Government’s response will be dictated by the pandemic stage that the U.S. is experiencing.



1. This should include, from a minimum from all functional, business and product areas, including administrative, human resources, legal, information technology support functions, and key product lines. [↑](#footnote-ref-2)
2. This will be determined based on the severity of the outbreak. [↑](#footnote-ref-3)