



## **Business Continuity**

## **Pandemic Response Plan**

March 2022



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# Overview

Alloya Corporate Federal Credit Union (Alloya) pandemic plan has been developed around a three-phase process in order to respond to different levels of a pandemic event or events. Phase 1 represents our normal day-to-day operations; phase 2 represents our response to a moderate threat; and phase 3 details our response to a threat considered to be severe in nature. Various triggers have been established as a guideline to enable Alloya to determine what actions, if any, are needed at that time. The following criteria are monitored, with the trigger defined for each level within the phase details: staff absenteeism due to illness, World Health Organization (WHO) Pandemic Alert statuses, and state/local health department levels. Appendix A graphically displays a combined overview of these trigger levels.

The Operations Risk Committee (ORC) is responsible for oversight and management of a pandemic event that affects Alloya. The committee is comprised of the following members and augmented when the situation warrants.

- VP, Operations Risk, Chair
- VP, Interest Risk Management, Vice Chair
- SVP, Risk Management & Administration
- VP, Accounting Information Systems
- VP, Compliance
- VP, Credit Risk
- VP, Cyber Security
- VP, Infrastructure & Security
- VP, Member Product Support
- VP, Member Services & Relations
- VP, Payment Delivery
- AVP, Compliance

In the event that a member of the ORC has been adversely affected, the remaining ORC members, senior management and others as assigned, will make decisions pertaining to implementation of the pandemic response. Each phase, its triggers, and action plans are noted in detail. Testing of this plan will be incorporated into our business continuity plan test schedule.

Alloya's pandemic plan is based upon three basic principles: first, employees are encouraged to take care of themselves as recommended by the CDC; second, we recommend social distancing in phases 2 and 3 where employees will be encouraged to stay home; and third, management will be proactive to maintain a safe and healthy work environment where sick employees will be sent home and accommodations for additional paid sick leave and other factors will be evaluated as conditions warrant.

## I. **Phase 1 Details**

### A. Defined:

Phase 1 is our normal day-to-day operations. The thresholds for this phase are:

- Absenteeism due to illness remains below 15%,
- WHO status is at phase 1, 2 or 3, and
- The U.S. response stage level is at 1.

If any of these thresholds are crossed, the ORC will convene to discuss a possible phase change. While operating at this phase, normal monitoring of the triggers, defined as absenteeism, WHO alert phases, and U.S. response stage levels, will occur. In addition, regularly scheduled training and testing of the Business Continuity and Pandemic Plans continue.

### B. Action Options:

- 1.) Required Actions:



- a. Ongoing monitoring of staff absenteeism levels as reported by managers and monitored daily by the Human Resources department.
  - b. Regular monitoring of current WHO pandemic alert phases.
  - c. Regular monitoring of U.S. government agency pandemic response stages.
  - d. Corporate-wide, employee cross-training is facilitated which includes annual testing of designated alternates, at minimum. Participation is tracked.
  - e. Individual departments coordinate cross-training efforts within their own groups. Results of cross-training efforts are documented in their test plans.
  - f. Maintain a supply of bottled water, food, medical and personal hygiene supplies for use by staff as needed.
  - g. Regularly inventory the above mentioned supplies, rotating, replacing and/or disposing of stock when expiration dates are approaching.
  - h. Document recovery team members in business continuity plans.
- 2.) It is recommended that all staff utilize the following supplies, services and/or benefits provided by Alloya:
- a. Soap is made available in restrooms and in kitchen areas.
  - b. Anti-bacterial hand sanitizer is available to all staff.
  - c. Disinfecting wipes are available to all staff.
  - d. General First-Aid supplies (i.e., band aids and antiseptic) are accessible to staff.
  - e. Personal protection equipment and medical supplies include:
    - (1.) Protective masks,
    - (2.) Nitrile and/or latex gloves,
    - (3.) Other general health medications and first-aid supplies.
  - f. The facilities are cleaned daily.
  - g. Leave benefits are provided for employees, based on employment status and time accrued. Each employee's eligibility for, and availability of, leave time is maintained by Human Resources for the leave benefits noted below:  
(consideration for flexibility will be based upon the severity of the pandemic)
    - (1.) Combined Leave Time (CLT)
    - (2.) Reserved Sick Time (RST)
    - (3.) Disability Leave
    - (4.) Unpaid Leave of Absence
    - (5.) Family Medical Leave
  - h. Annually, Alloya makes influenza vaccines available to employees. The vaccines are administered by an outside health provider.

## C. Testing

At least annually, business continuity testing addresses a pandemic scenario including:

- a. Alternate staff perform responsibilities in the office and/or remotely;
- b. Emergency notification system poll staff to respond if they are available;
- c. GETS subscribers access and use of the system is confirmed;
- d. Work-from-home resources and capabilities are validated; and
- e. Emergency Status Line is used to communicate situation updates.



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## **II. Phase 2 Details**

### **A. Defined:**

Phase 2 is our response to a moderate threat. The thresholds for this phase are:

- Absenteeism due to illness is between 15% and 35%,
- WHO status is at phase 4 or 5, and
- U.S. response stage level is at 2.

If any of the phase 2 trigger thresholds are crossed, the ORC will meet to discuss a possible phase change. While within Phase 2, these triggers will continue to be monitored for changes that might require the initiation of another meeting of the pandemic team to discuss what further action(s), if any, need to be implemented. These actions may include but are not limited to changing our status to a different phase.

### **B. Action Options:**

- 1) Optional Actions in addition to Phase 1:
  - a) Prepare staff for possible communications regarding our status.
  - b) Update the status line with relevant information.
  - c) Schedule staggered shifts to facilitate social distancing. Details of shift changes would be determined by the affected recovery team leads in conjunction with senior management and the ORC.
  - d) Allow key personnel to work from home by way of remote access.
  - e) Encourage staff to verify VPN access and work from home resources needed.
  - f) Instruct the cleaning vendor to use higher concentrations of cleaning solutions and/or more frequent cleaning of facilities.
  - g) Some or all of the supplies of water, food, personal protection equipment, medical and personal hygiene supplies may be augmented.

## **III. Phase 3 Details**

### **A. Defined:**

Phase 3 encompasses our response to a severe threat. The thresholds for this phase are:

- Absenteeism is above 35% due to illness,
- WHO status is at phase 6, and
- U.S. response stage levels are anywhere from 3 through 6.

If any of the phase 3 trigger thresholds are crossed, the ORC and others as deemed necessary will meet to discuss a possible phase change. While Alloya is in Phase 3, these triggers would continue to be monitored for changes that would initiate another meeting of the ORC to discuss what further action(s), if any, need to be implemented including changing to a lower phase.

If escalating from phase 1, continue phase 1 action(s) with the possible removal of training and testing with any additional phase 2 and 3 action options as deemed necessary by the ORC or senior management. If escalating from phase 2, continue phase 2 action(s) with any additional phase 3 action options as deemed necessary by the ORC or senior management.



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## **B. Action Options:**

- 1) Optional actions in addition to those noted for Phases 1 and 2:
  - a) Update Alloya's website to notify membership of our current pandemic phase level. Additional information may be provided so that members are aware of actions being taken to mitigate the current situation, in order to ensure that services continue to operate as closely to normal as possible. The website will be updated by Alloya's Marketing Group.
  - b) Staff at unaffected offices will help to continue operations in the absence of key personnel working from home and/or alternate site(s).
  - c) If needed, nearby hotel facilities may be used to lodge staff to assure quicker and easier access to the affected Alloya facility. Housing arrangements could be made available to staff within Alloya's facility due to transportation, quarantine or other issues.
  - d) The distribution of personal hygiene supplies and the use of the food and water supplies can be activated.

# Appendix A

## Trigger Thresholds

WHO Pandemic Communications		ALLOYA Phases		U.S. State & Local Public Health Departments	
Pre-pandemic Intervals					
0	No pandemic concerns	1	Absenteeism due to use of sick leave below 15%	1	Identification of infection in humans or animals in the United States with potential implications for human health
1	News of a specific potential pandemic threat is circulated by the World Health Organization (WHO) or the Centers for Disease Control (CDC) with reports of human cases outside of the USA.				
PANDEMIC ALERT PERIOD					
2	News of a specific potential pandemic threat is circulated by the World Health Organization (WHO) or the Centers for Disease Control (CDC) with reports of human cases in the United States.	2	Absenteeism due to use of sick leave 15-35%	2	Confirmed human outbreak overseas.
3	WHO or CDC reports that a pandemic disease is present in the USA, but no reported cases are present in the region or communities where Alloya operates.				
4	WHO or CDC report that a pandemic disease is present within a community where Alloya operates				
PANDEMIC PERIOD		3	Absenteeism due to use of sick leave above 35%	3	Widespread human outbreaks in multiple locations overseas.
5	Cases have been confirmed within Alloya locations.			4	First human case in the United States.
				5	Low pandemic influenza activity but continued outbreaks possible in the state
				6	Recovery and preparation for subsequent waves.