

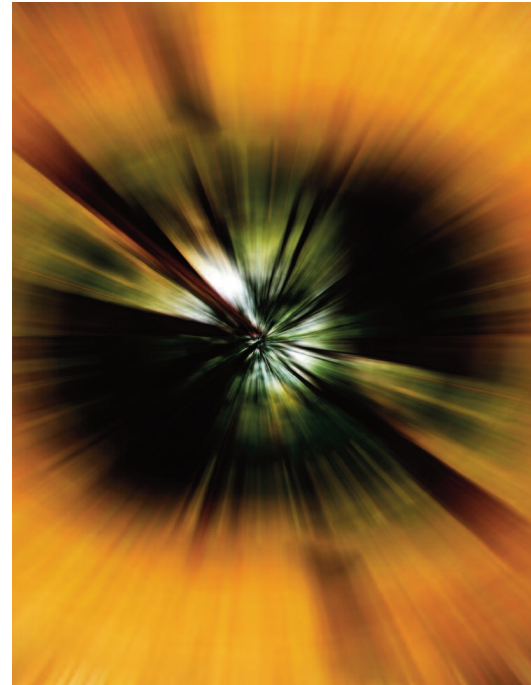
PREPARING YOUR PANDEMIC RESPONSE: THE TIME IS NOW

Flu season is here and the only certainty about the potential spread of H1N1 in the weeks ahead is uncertainty. Are you ready for a worst-case scenario? Are you ready for the issues and questions that arise in even a moderate pandemic? Readiness in the form of a response plan is the best preparation you can undertake. The time for readiness is at hand.

THE SEASON BEGINS

October 4 was the official start of this year's flu season, although the government declared a public health emergency in response to the H1N1 pandemic earlier in the year. According to the most recent information provided by the World Health Organization and the Centers for Disease Control and Prevention (CDC):

- The Americas have been hit the hardest so far regarding the number of confirmed cases and flu-related deaths.
- The proportion of deaths attributed to pneumonia and influenza has increased and now exceeds what is normally expected at this time of year.
- A significant number of pediatric deaths have been reported since April.
- Vaccine efforts are underway and more vaccine is being released. However, a recent poll by the Harvard Public School of Health found that only 50% of American adults planned to be vaccinated.
- Pregnant women are particularly at risk. Significant numbers have been placed on ventilators and many have died.
- Pneumonia associated with this flu is also a danger, prompting recommendations for people to receive a pneumonia vaccine.



A PANDEMIC'S EFFECT ON YOUR BUSINESS OPERATIONS

So what plan *does* your business have in place to deal with the possible effects of H1N1 on your daily operations? Business continuity plans tend to focus on more common catastrophes, such as earthquakes, fires or floods that result in physical damage to property and assets. A health emergency requires special consideration. Unlike other potentially catastrophic events, a pandemic may not be geographically or temporally bound. A fire may impact only a single location and strike without warning. A hurricane or flood may impact a specific region. Pandemics, however, usually occur in waves of variable duration and will vary in severity throughout the world.

The good news is that a traditional business continuity management program can be the basis of a plan that addresses the pandemic threat.

KEY CONCEPTS IN A BUSINESS CONTINUITY PLAN

If you do not have a business continuity plan (BCP), there is no better time to develop one. The first step is to identify mission-critical operations and business functions. How do we identify those mission-critical operations or business functions? Everyone in the organization tends to feel that what he or she does is most important. A formalized method is needed to identify essential business functions and non-essential functions that can be suspended during a major business disruption.

HR MATTERS

Human resources considerations must play a large role in any assessment of pandemic risk. The most important asset to most organizations is its people. Although a pandemic will not likely affect the physical infrastructure of an organization, it may ultimately threaten all operations by its impact on an organization's human resources. Since human resources departments work to ensure the health, safety and welfare of employees, in a crisis situation, this team will need to focus on maintaining adequate staffing and monitoring employee health.

Corporate policies regarding employee practices, pay practices, time off benefits, standards of conduct, new associate orientation and communications should all be coordinated with HR to determine the potential impact of a flu outbreak on workforce capabilities. Communication is critical to ensure everyone knows what is going on. Information and advisories via hotlines, websites and voice message system alerts – operating like a reverse 911 system – are crucial.

BUSINESS IMPACT ANALYSIS

If we compare business continuity plan development to building a house, the business impact analysis (BIA) is the foundation. The BIA is a process used to determine the effect of an interruption or disruption on systems, equipment, services or personnel.

In performing a BIA, you should identify the maximum time before the interruption of a function or process causes significant harm to the business. This timeframe is called the recovery time objective (RTO). RTOs can range from seconds, to hours, to days.

When determining RTOs, you should consider operational contingencies. For example, in certain industries, the manufacturing process requires certification from a governmental agency before

operations resume. If your recovery strategy includes use of outside contractors, or even another facility in your own organization, the timeframe needed for this certification process must be taken into consideration when determining the RTO.

PRACTICE YOUR IMPLEMENTATION

Once the plan is developed, you should perform an exercise in which everyone assigned a specific task becomes familiar with the role they will play. It is important to note that this is a plan exercise and not a test, since a test implies something you either pass or fail. Here, the focus should be on practicing and learning. Consider several types of exercises and training steps:

- An informal orientation that lasts about an hour is one way to educate personnel on the function and processes of the plan.
- In a tabletop exercise, staff reviews and discusses the actions they would take, but no one actually performs any of these actions. This may take 2-4 hours.
- A functional exercise simulates a scenario as realistically as possible without moving personnel, equipment and resources to the actual backup sites. This may take 4-6 hours.
- In a full-scale exercise, personnel, equipment and resources are deployed to a specific location for a real-time simulation of a scenario. This may take at least 6-8 hours to complete.

A business continuity plan should also include regular plan review, particularly after an actual event. For example, once a pandemic has been declared under control and public health officials allow people to return to work, a process should be set to critique the plan and the actions performed so you can be better prepared for the next disruption.

CONDUCTING A BUSINESS IMPACT ANALYSIS

To assist you in conducting a BIA, key questions should be addressed by all levels of leadership in your organization:

- *How important is a particular function to your overall business? Who are the clients and other business units that are dependent upon this function?*
- *Could you lose clients if this function is not provided in a timely manner?*
- *Could there be a significant revenue loss if this function is not performed?*
- *Is there a risk of a substantial fine or penalty if the function is not completed?*
- *How long can a business function or customer service be delayed before there is an adverse impact?*
- *Do you rely on outside service providers for vital information or products or services?*
- *What would be the impact to your business if these providers are unable to operate?*
- *Could a service disruption lead to a loss of client confidence and, ultimately, the client's business?*
- *Could your company reputation be harmed because of a prolonged business interruption?*

In addition to detailed interviews with senior management in charge of each business unit, you should consider these other points when developing your BIA.

- It may be helpful to diagram your workflow so you can visualize all the dependencies and components of each function. That will help you estimate the impact of losing one of these dependencies or components.
- As outage time increases, a function or service that may have been deemed a low priority may become a higher priority.
- Business interruption can result in tangible losses: declining revenue, departing customers and potential fines. There are also intangible losses such as loss of reputation and damage to the company's image.
- Disruptions affect business units at different times. Some functions or services may be adversely impacted within minutes while others may take hours or days to be impacted.

RESPONSE AND RECOVERY

Once your BIA is complete and your recovery time objectives are set, you can start developing your response and recovery procedures.

1. MANAGEMENT STRUCTURE

Orders of succession for key positions should be of sufficient depth to ensure the organization's ability to manage and direct its essential functions and operations. Succession plans for leadership should be at least three deep in each position. Organizations should also document delegations of authority that specify limits of that authority. Who is the person within your organization who has the authority to declare a disaster? This disaster declaration is going to set everything in motion so you want to be absolutely sure that your definition of disaster has been met.

2. CONTINUITY

Disaster plans usually call for setup of a command center or emergency operations center (EOC). During a pandemic, you may need to use multiple continuity facilities and they will all need support, services and infrastructure. This may include items such as food and water, laptops and phones.

3. VITAL RECORDS

Your company will want to have the data available to sustain operations for at least 30 days. If not already developed and maintained, a current list of vital records, systems and databases should be developed. Also, you will want to ensure that hard copies of vital records are current at each facility.

Creating a BCP helps ensure development of complex responses to complex situations. A wait-and-see approach will not work. Since everyone in the organization becomes involved in the process, an examination of difficult and controversial issues takes place. The time to work out the logistics of who is in charge, what authority they have and other political issues that arise in an emergency that affects large numbers of people is before the event actually occurs.

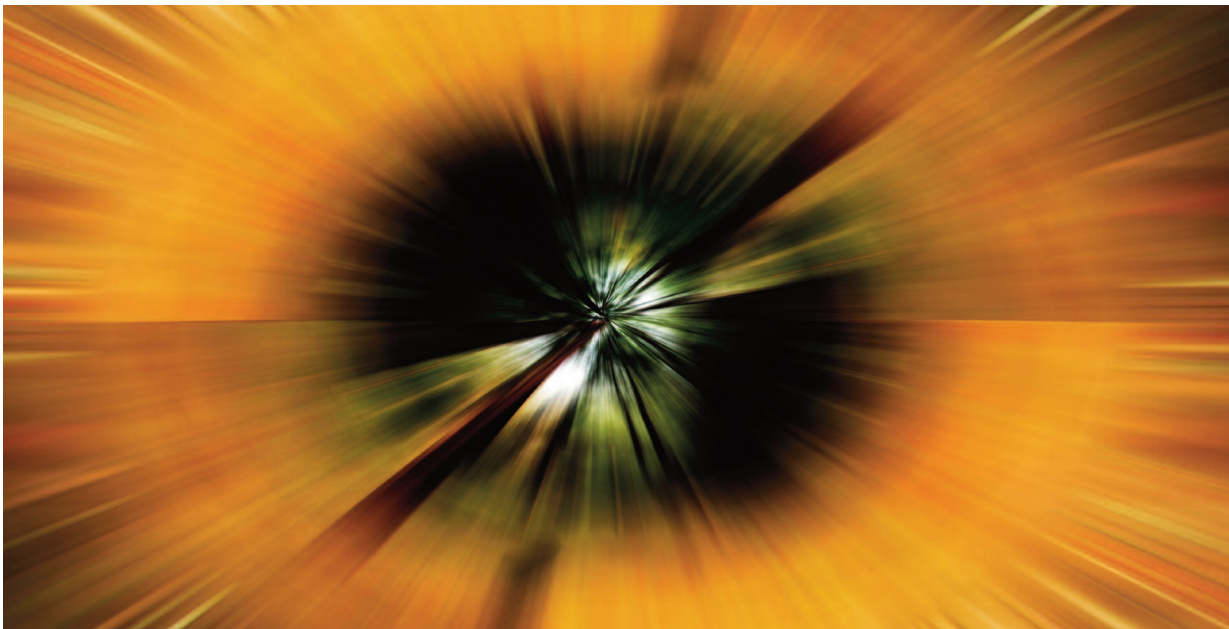
A BCP will address the well being of employees, minimize the extent of disruption, establish alternative means of operation, minimize the economic impact, train and education personnel so they are familiar with emergency operations and functions, and provide for a smooth and rapid transition of services.

KEY QUESTIONS TO ASK

MISSION CRITICAL OPERATIONS

If an H1N1 outbreak hits your organization, your BCP should help you answer key, immediate questions concerning your mission critical operations:

1. Are we able to sustain our operations if half of our workforce is absent for two weeks, a month or longer?
2. What can be done to minimize the impact on revenues and expenses? Is now the time to consider:
 - Modified work schedules and locations
 - Changing operating hours
 - Temporarily ceasing non-essential functions
3. Do we have contingency suppliers and vendors that are also prepared? Have we asked? Have we considered:
 - Logistics
 - Temporary staffing services
4. Have we reviewed our contractual obligations if we cannot deliver goods or services? Are there fines or penalties involved if we cannot meet those obligations?
5. Have we crossed-trained employees, especially in leaner staffed areas?
 - Media relations
 - Risk management
 - Human resources (HR can expect many calls related to sick pay, absenteeism, benefits, FMLA, etc.)
 - Payroll (everyone still wants their check deposited)
 - Accounts payable
 - PBX operators
 - IT staff
6. Have we performed real-time testing of remote access by large numbers of employees so that we know our systems can handle the load?
7. Do supervisors know how to manage a dispersed workforce to ensure the work is being done?
8. Have contingency signatory authorizations been put into place for dispersing funds and other operational necessities? Remember, CFOs get sick, too.



WHAT NOW?

Now that you have a BCP, the first thing to do when an emergency happens or threatens to happen is communicate. You should communicate to your employees, customers and vendors. The most vital message is often: “We are monitoring the situation.” Communicating something is better than communicating nothing. Employees who feel safe and feel their employer is prepared are more likely to remain productive during a crisis. Apprehensive or scared employees may not show up to work. Share with your customers that you have a plan in place, you intend for business to continue as usual, and they should contact you at any time with any concerns. Ask tough questions of suppliers and vendors regarding their supply chains and their own accessibility.

Methods to communicate and educate:

- Posters
- Email blasts
- Daily updates on intranet sites
- Links to CDC/flu.gov widgets on your home pages

HR ISSUES

Your guiding principle regarding HR issues should be flexibility, with the overriding goal being wellness in the workplace. The aim is to keep a healthy workforce on the job while preventing spread of the flu. Beyond that:

- Know your sick pay and absenteeism policies (not just HR professionals but supervisors, as well).
- A team should have already determined responses to the most frequently asked HR questions so a consistent message is delivered. This message could be scripted for managers.
- Know your company’s normal seasonal absentee rates. Monitor current rates and be ready to act if they start to climb. This could signal a significant outbreak in your facility.
- Know how to handle employees who show up sick at work and how best to send them home.
- Have alternative child care/elder care solutions been explored?
- Do you have employees that may be considered at higher risk, such as pregnant women? Have you considered a potential plan for addressing social distancing or working remotely for them?
- Have policies for non-essential travel been formulated and has your staff been educated on them?
- Have you considered or met with occupational health or corporate medicine service providers concerning the following?
 - Turn-key operations
 - Screening
 - Vaccines
 - Antivirals
 - Education
 - Medical supplies
- Have costs associated with vaccines been evaluated? (Vaccines are free but getting the shots is not.)
- Most physicians are not providing return to work notes – do you require them? Doctors do not want potentially contagious people in their offices and some hospitals have implemented drive-through flu screening in their parking garages to cut back on non-emergency ER visits.
- A word of caution on extended time out: family leave issues may apply, especially if an employee or family member has complications or extended illness.
- Also, there is potential for ADA, OSHA, and Worker’s Compensation legal issues to arise. Be very cautious with personal medical information, which must be kept strictly private. You cannot say, “We sent Susie home because she has H1N1” or “Jonathan is in ICU because he got pneumonia from the flu.”
- Remember, OSHA’s general duty clause requires employers to provide “safe and healthful working conditions.” Be prepared to show you did and you do.

BEST PRACTICES AND RESOURCES

- If you haven't visited the CDC website, do so. They have specific guidelines for the workplace, as well as posters and educational material available as downloads.
- Flu.gov also has some of the best and most accurate information available.
- Consider acquiring access to a corporate medicine expert.
- Consider a hotline or email link where employees can leave questions and get answers.
- Put FAQs on your intranet site and include links to the CDC and flu.gov.
- Consider recognition for team play and awarding those who go beyond expectations to help keep your operation going.

When all is over, you can reflect on things and adjust accordingly. Pull a group together, evaluate your own performance, and tweak your plan to ensure the best possible preparedness in the face of future uncertainties.

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