

US financial services sector prepares for pandemic flu

Annie Searle

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Senior Vice President, Enterprise Risk Services, Washington Mutual, 1301 Second Avenue, WMC 0601, Seattle, WA 98101, USA;
Tel: +1 (206) 500 2250; e-mail: annie.searle@wamu.net

Annie Searle is Senior Vice President and Divisional Executive for Enterprise Risk Services at Washington Mutual (WaMu). Her portfolio of responsibilities includes business continuity and technology risk management for the entire company, as well as regulatory and audit assurance for the technology group. She is the chair of WaMu's crisis management team. Nationally, Annie represents WaMu as a member of the BITS Advisory Council for the Financial Services Roundtable (FSR), with special interests in crisis management, terrorism and regulatory burden. She was appointed a delegate in the areas of pandemics and terrorism to the FSR Blue Ribbon Commission on Mega-Catastrophes in 2006. Locally, she represents the financial sector on the King County Emergency Management Advisory Committee.

ABSTRACT

This paper examines the state of pandemic planning in the USA, with special focus on the financial services sector. It first discusses planning approaches taken by a single company. It goes on to discuss planning at a regional level, with a focus on integrated public-private sector planning. Finally, it examines planning by the US financial services sector, exemplified in the interim pandemic report of the Blue Ribbon Commission on Mega-Catastrophes.

Keywords: *Hurricane Katrina, pandemic, avian flu, bird flu, public-private*

partnerships, financial sector, disaster preparedness, homeland security

INTRODUCTION

'But that ... is no answer. For if he did begin in error, he may have forced the remainder into agreement with the original error and with himself ... And this is the reason why every man should expend his chief thought and attention on the consideration of his first principles: are they or are they not rightly laid down? and when he has duly sifted them, all the rest will follow' (Socrates).¹

By now, there have been volumes written on and in-depth media coverage of the events surrounding Hurricane Katrina, which struck the US Gulf Coast in August 2005. Business continuity professionals joined most of the world in watching as government officials tried to figure out who was in charge and what could be done. The public watched as law enforcement officials resigned and the US National Guard was brought in to restore order during the extended period when basic public services could not be restored.

'In the days to come, as the nation and the people along the Gulf Coast



work to cope with the disastrous aftermath of Hurricane Katrina, we will be reminded anew how important it is to have a federal agency capable of dealing with natural catastrophes of this sort. This is an immense human tragedy, one that will work hardship on millions of people. It is beyond the capabilities of state and local government to deal with. It requires a national response.²

To those who had already begun to consider how a worldwide pandemic might affect business, it became abundantly clear that there had been a breakdown among critical infrastructure sectors, both public and private. There was no immediate answer to ‘who is in charge?’. The essential lesson was *do not assume there is a clear-understood and coherent framework into which public and private entities can tie in their respective disaster response plans*.

Hurricane Katrina started business continuity professionals thinking along another path. Unlike such catastrophic events as the 2004 tsunami, there is generally advance notice of potential hurricane activity, just as there would be with a pandemic. Given the possibility of a pandemic,³ especially now that it is understood that such a virus could be manufactured in a lab and used by bioterrorists, advantage must be taken of this opportunity to plan and to prepare for such an occurrence.

Moreover, pandemic preparation offers the chance to integrate plans in a federated approach that spans both the public and private sectors. Boundaries between cities, states and indeed nations will not be material if the present opportunity is taken to prepare in increasingly broader circles of influence: first at home, at the company level, then at the regional level, and finally as part of a concerted national response, orchestrated

into a broader global response. For most, the chance to have up to five years to prepare is an unprecedented opportunity to do good while at the same time strengthening overall ongoing disaster response programmes.

PREPAREDNESS AT WASHINGTON MUTUAL

Washington Mutual (WaMu) is the USA’s largest thrift institution, and its sixth largest financial services company. It currently operates more than 2,600 consumer and small business banking stores across the country, and employs about 50,000 people.⁴ It is important that banks continue to serve customers throughout a pandemic. One of the first things people do in a disaster — after looking after the health and safety of loved ones — is to access their money. In this respect, banks are a critical lifeline to customers.

Because hurricanes are familiar to the south-east region of the USA, where WaMu has a longstanding presence, the bank has already established programmes to identify key facilities to keep open during a disaster, as well as an employee communications programme for those who live and work in affected areas. In the autumn of 2005, with Katrina fresh in mind, the bank looked at how elements of its hurricane planning methodology could be used for pandemic preparedness.

The bank has direct experience providing employee support and customer service during critical infrastructure outages. However, outages that result from hurricanes can generally be repaired within a reasonable period, and usually come with five days or more of warning. There may be a significant difference between how to maintain or restore critical operations disrupted by a hurricane compared with the disruption caused by a pandemic.

In an internal report six months after a company taskforce started to examine corporate readiness, executives were informed that:

‘The pandemic flu scenario poses significant challenges for even a more mature business continuity program. Our program — described as “cutting edge, verging on world class” by external auditors — is focused execution to recover any significant business process or operation in less than eight hours (“mission critical”) or in less than 24 hours (“critical”) ... All estimates we have indicate that a pandemic flu would be with us for many weeks, if not months; and that multiple regions of the country would be affected at the same time. Strategies we have developed for business and technology resiliency — with primary and secondary failover sites located on different coasts or in different regions of the country — will not necessarily assure continuity of operations if multiple regions are affected at the same time.’

The initial scoping of pandemic issues also looked at the environment in which employees and their families would be operating:

‘In a pandemic flu outbreak, the Centers for Disease Control and Prevention (CDC) and local public health departments will make decisions to close public institutions such as schools, universities, sporting and other forms of entertainment events. Analysis is underway now on how our hospitals and other medical facilities would handle load and volume, which could also include the need to establish quarantine facilities. We will rely heavily upon bulletins from our

government officials that advise us of closures and related actions that might have to be taken. The company is already working closely with public health departments in its signature markets to ensure that a solid public-private relationship is enhanced for both planning and execution in the event of a catastrophic outbreak. One of our assumptions must be that 35–50 per cent of our public sector first responders — fire, police, health and EMT medical — will also be affected by the pandemic flu.’

Appended to that report was the seminal Financial Services Sector Coordinating Council document that had prompted WaMu’s own efforts, entitled ‘Issues for consideration regarding preparations for avian flu’,⁵ to which many members of the financial sector, including WaMu, had contributed. Since that report was written early in 2006, WaMu has made a great deal of progress in identifying challenges and aligning plans more broadly with both the larger financial sector and the public sector. The bank has been working for more than 18 months on pandemic preparedness, focusing on a number of areas, including three key issues: educating employees about wellness and prevention, supporting managers with business planning in the event of a pandemic, and planning to maintain customer service in the event of a pandemic.

At a high level, 2006 WaMu pandemic preparedness deliverables included:

- pandemic flu crisis management triggers aligned with World Health Organization triggers;
- company-wide review and prioritisation of business and mission-critical processes into pandemic classifications of critical, reduced and suspended;
- integrated communications and educa-

tion programme for both employees and customers, utilising multiple channels;

- manager telephone tree testing packets and reports deployed, which had the side benefit of online organisational hierarchies being cleaned up;
- key vendor confirmation as to whether or not their pandemic plans exist;
- preparation of pandemic continuity plan with checklist and templates, with most data prepopulated for business and corporate segments;
- first pandemic test performed in the north-east region from the New York City trading floor on 11th September, 2006;
- participation in the National Infrastructure Assurance Council's focus on pandemic planning and the Financial Services Sector Coordinating Council's discussions on financial sector pandemic planning.

For 2007, WaMu has six significant deliverables:

- strengthen infrastructure for telecommuting to ensure that key employees who cannot come to the office can work remotely;
- identify customer-facing offices, administrative support facilities and ATM locations that will be kept open in main markets, and establish mechanisms to inform both customers and employees;
- identify precisely what kind of regulatory relief will be needed in the event of a pandemic and then encourage the federal government to make decisions now, not later;
- perform ongoing, increasingly sophisticated quarterly pandemic readiness summits and scenario tests;
- integrate succession planning and delegation of authority information into pandemic plans, which pre-identify

critical, reduced or suspended processes; and

- continued coordination with the Financial Services Sector Coordinating Council through BITS and the Financial Services Roundtable (FSR), information sharing with members of the BITS Crisis Management Coordination Working Group, and engagement with officials from the Department of Homeland Security (DHS), financial regulators and other government officials.

After nearly 18 months of work, it has become clear that the real challenge of pandemic planning is that it is so very people-focused. WaMu's human relations (HR) systems are set up hierarchically, but dealing with a pandemic requires that critical HR processes — like approving time — can work also horizontally and vertically. Efforts have begun to create workarounds that can be automated if necessary in areas like time-reporting. Up to five successors identified per senior vice president in the company have been requested, as well as the identification of both a primary and a secondary subject matter expert to be identified to perform critical and reduced business processes. Once identified, the required authority, access permissions, training and equipment for the identified personnel will be assembled.

These are not simple matters, and the challenges are large for any financial services company, given that services are disparately organised and enabled across the country. Even if the plan is perfect, the bank will still be dependent upon other non-financial critical infrastructure sectors like telecommunications, public utilities and the transportation network. The leaders at WaMu believe that how a company operates and conducts itself during a potential threat like a pandemic

says a lot about the kind of company it is. WaMu has taken great pains to be prepared for something that everyone hopes will never materialise. If a pandemic does occur, WaMu will maintain open lines of communication with employees, customers, shareholders and business partners, as well as health and emergency management organisations. Most importantly, the bank has executive support for the integration of the pandemic preparedness programme into the regular business continuity and emergency planning programme, which is continually being refined.

The present paper is about more than just WaMu's challenges and plans, however, because this institution is only one piece of a much larger puzzle.

REGIONAL PUBLIC-PRIVATE PARTNERSHIPS

'Terror rises in the dark of the mind, an unknown beast tracking us in the jungle ... In every horror movie, once the monster appears, terror condenses into the concrete and diminishes. Fear remains. But the edge of panic created by the unknown dissipates ... So the final lesson of 1918, a simple one yet the most difficult to execute, is that those who occupy positions of authority must lessen the panic that can alienate the members of a society. A society that takes as its motto "every man for himself" is no longer a civilized society.'⁶

To truly integrate planning with other institutions in e-signature markets, WaMu integrates its regional testing with the public sector wherever possible. WaMu also participates on the national stage as a member of the financial services industry, a critical infrastructure sector in the USA

and around the world. What former New York City mayor Rudy Giuliani calls 'relentless preparation' can make all the difference between feeling as though one is in the midst of a horror movie, and the kind of calmness associated with having a clearly defined plan.

The two kinds of necessary planning — regional and sector-specific national planning — strengthen regular business continuity and emergency management plans. So, the real question is not whether to prepare for a pandemic, but rather how to work effectively from existing organisational frameworks to broaden and deepen respective organisational regional bandwidths in both the public and private sectors. The challenge is to find a way across critical regional infrastructure sectors to integrate public and private scenario testing without rehashing old arguments about command and control versus strong partnership and collaboration.

Following the September 11 terrorist attacks, the US Department of Homeland Security (DHS) was created first in the White House and then by legislation in 2002.⁷ DHS went on to create the National Incident Management System (NIMS), which requires local and state emergency management officials to create and report plans for their respective regions of the country. At this time, WaMu has not been made aware of any particular 'disaster preparedness' focus to NIMS. Although grants have been made to strengthen the overall resiliency of the country against terrorists rather than hazards in general, pandemic preparedness offers the chance to identify opportunities to streamline and strengthen the Federal Emergency Management Agency (FEMA), which now resides inside DHS. In his book, 'Americans at Risk', Irwin Redlener argues in a chapter entitled 'Missing and misplaced leadership' that:

‘The “good” leaders we do have, in the military, in local agencies, and even scattered throughout FEMA itself, are tangled up and disempowered in dysfunctional bureaucracies or sidelined by politics and policies that make little sense and undermine our ability to respond effectively when big disasters strike.’⁸

Given the current condition of FEMA, it is possible to see pandemic flu planning as not only strengthening individual organisations’ regular business continuity plans, but as a potential foundation for a new way of organising emergency response and event management in the USA. It is possible to use NIMS and the organisational framework of regions that DHS has laid down to move down the path of integrated public and private planning efforts. The Pacific Northwest provides an example of how regional coalitions can raise their game and include increasingly more complex factors into their modelling.

US media has said that the two most pandemic-prepared cities are New York and Seattle. Seattle (ie the Pacific Northwest region) is blessed with a number of extremely well-organised entities that have been focused on tests of various kinds of catastrophic events over the past five or so years. In this region, there are several examples of organisations and tests with both public and private sectors that involve relentless preparation for a variety of scenarios, including a pandemic. The first is the Pacific Northwest Economic Region (PNWER), an organisation created by uniform legislation in 1991 as:

‘a statutory, public/private partnership composed of legislators, governments, and businesses in the Northwest states of Alaska, Idaho, Montana, Oregon and

Washington and the Western Canadian provinces of British Columbia, Alberta, and the Yukon Territory. If it were a nation, PNWER would rank 10th among the world’s leading industrial economies, with combined population of more than 18 million and an annual gross regional product of over \$697 billion (USD).’⁹

The PNWER geographic grid is much larger than the DHS Region 6 under which WaMu also operates. It crosses national boundaries to include five states and three Canadian provinces. PNWER has conducted five major regional inter-dependency exercises called ‘Blue Cascades’ since 2002. The recent test brought over 100 public and private sector leaders together in January 2007 to focus on sustaining service delivery during a pandemic outbreak.¹⁰ The full-day exercise script was written by a working group that represents a number of public and private organisations. Following the presentations of the speakers and scenario test itself, it became clear that WaMu may have to reconsider some elements of the perspective that it uses to plan for such a scenario. Dr James Young, former Emergency Management Director of Ontario during the severe acute respiratory syndrome (SARS) outbreak, emphasised the necessity of reducing the estimated percentage of those who would stay home from work or school out of fear, or out of the ‘every man for himself’ mode. He recommended against spending valuable resources planning for quarantines, showing from the Canadian SARS experience that children not attending school still meet up with their friends, whether at the mall or in one another’s homes. Dr Young also stressed that there are still weak surveillance systems and a stigma connected with reporting the H5N1

virus in the very countries where a pandemic is likely to originate.

The second Pacific Northwest example involves work performed by the King County Office of Emergency Management, as well as its public-private sector Emergency Management Advisory Committee, on which the present author serves as the representative for the financial sector. This organisation has a hardened Regional Communications and Emergency Coordination Center (RCECC) outside the Seattle urban centre, and works in close partnership with the City of Seattle and surrounding cities, as well as with the State Emergency Management Office. The RCECC is the location where officials meet face to face to coordinate a jurisdiction's overall disaster response and recovery efforts in support of field operations. In December 2006, for example, the RCECC was used to coordinate a regional response to significant power outages resulting from a series of bad storms, and issue critical updates to the media.

King County already conducted a test involving remote management of its facility last winter. Following on the heels of a pandemic test by the City of Seattle, King County conducted a more extensive pandemic flu test in March 2007. Its advisory committee meets monthly, and includes voting representation from towns and municipalities as well as from the county public health department, the City of Seattle, Native American tribal councils, and from area-wide first responder agencies like the police and fire departments. It is one of the most broadly constituted and representative committees in the region, and was deliberately designed to include the private sector. It works on a range of matters, including the comprehensive emergency management plan and the regional disaster plan, in addition to Region 6 DHS funding proposals.

In the Pacific Northwest, organisations work cooperatively. That may not be the case across the USA, or in other countries, although there are outstanding examples of public-private sector partnership elsewhere. For example, Chicago First, a financial services industry coalition for business continuity, holds a seat in that city's emergency operations centre and recently completed a significant pandemic test. However, it remains important for business continuity professionals to understand the roles of all the players during a pandemic, whether local, regional, national or international.

The Blue Cascades IV scenario, accessible on the PNWER website,¹¹ clearly illustrates questions that could arise about who is in charge. The confusion is of special concern because, as indicated in a very useful document produced by the National Governors Association, 'A pandemic will force many key decisions to be made in a dynamic environment of shifting events, and partnerships must be built now and tested to ensure appropriate and rapid action'.¹²

These remarks have focused on only one region. At national level, in the absence of any clearly identified federal leadership (eg in the USA, it presently appears that the Department of Health and Human Services is taking the pandemic lead over the DHS/FEMA), planning must be approached from the various business and regional sectors in order to ensure that the public's needs will be fully served. In the USA, organisations cannot presently lock their own plans into any national planning entity other than the CDC, or at international level, the World Health Organization. The missions of both of these, however, focus on the public health aspects of planning, and not on the plans necessary to maintain critical services to the public during a pandemic.

THE FINANCIAL SERVICES ROUNDTABLE

‘We care because the organizations active in financial activities employ over 10 million people in the United States who could be affected. We also care because our institutions perform services that are literally the nerve center of our economy — processing payments; providing credit; and storing the wealth of individuals, businesses, and non-profit institutions. It is not just our financial well-being, but the financial health of the American — and indeed the global — economy that would be at stake in the event of a severe pandemic.’¹³

In a recent risk bulletin, Deloitte Development argues that while the responsibility for business continuity and crisis management is shared among businesses, governments, nonprofits and individuals, ‘citizens will look to businesses to help ensure that basic services are provided, and they will expect companies to work assiduously to get life back to “normal” as soon as possible’.¹⁴

In the USA, approximately 100 of the nation’s leading financial institutions are members of the FSR and its technology and business strategy division, BITS. FSR and BITS have provided an enviable number of risk management guides, lessons learned from major events (eg September 11, the northeast power outage of August 2003 and Hurricane Katrina), important Congressional testimony, and briefings and independent spin-off work groups or efforts, when appropriate.¹⁵ After observing the lagging recovery from Katrina, FSR appointed a Blue Ribbon Commission on Mega-Catastrophes to examine and make recommendations on what were called *the five horsemen*: hurricanes, floods,

earthquakes, terrorism and pandemics. For purposes of the commission’s report a ‘mega-catastrophe is a natural or man-made event that has significant adverse national impacts on economic activity, property or human life’.¹⁶ The commission has since issued two interim reports — one on Katrina and one on pandemic planning — as it prepares to issue its more comprehensive overall report in spring 2007. Of the 22 recommendations in the study, here are the key ones:

‘Recommendation 12: The Department of Homeland Security should adopt a system for monitoring the adoption and systematic simulations of pandemic preparedness plans in the public and private sectors and should regularly report the status of readiness.’

‘Recommendation 13: Every organization, public and private, should have a pandemic plan in place, and should simulate the plan at regular intervals to identify and remedy vulnerabilities. It is imperative for those industries that are part of the nation’s critical infrastructure to do so.’

‘Recommendation 15: It is urgent that private sector organizations representing different segments of the nation’s critical infrastructure intensify efforts to collaborate with each other to improve readiness. DHS, and the Treasury Department, as the lead agency for the banking and financial sector, should facilitate these efforts and work in partnership with the FSSCC (Financial Sector Services Coordinating Council) and other critical infrastructure sector coordinating councils, especially for telecommunications and electricity.’

‘Recommendation 16: Private sector firms in the financial and other critical

industries should develop, along with regulators, common assumptions about what events will trigger the implementation of pandemic response plans. The FSSCC should play a critical role in this process.¹⁷

In this set of recommendations, DHS and the US Treasury Department are recommended for the central coordinating roles around pandemic scenarios, and financial service sector organisations¹⁸ are expected to work with them on processes such as triggers. It is assumed that, at least with respect to the key oversight and recordkeeping roles for private sector tests, DHS becomes responsible, not only for the financial services sector efforts that are led by the Treasury, but for all national critical infrastructure interdependency plans and tests. Such a recommendation is certainly not in the scope of DHS's current mission.

What steps are necessary to bring discussion of an enabling role for DHS and FEMA into the public spotlight? Irrespective of how ineffective structures and authorities may have become in the past, is there an opportunity to consider and sift those first principles that Socrates described? The creation of a National Advisory Board for FEMA, at least in theory, offers a means by which the brightest minds might be gathered to produce a roadmap forward, a way of locking together the components of the puzzle in a new broad national effort.

Finally, one must ask how a new national framework could fit into a more global enterprise, when considering an outbreak that will spread rapidly across continents. How can information that falls outside the realm of public health, gleaned in one country, be shared seamlessly with other parts of the world, either by sector or through an enabling larger governance process not yet in place? For

example, the working report that covers the Chicago First pandemic exercise provides some of the first mentions of the need for advance provisioning and pre-positioning of supplies in a pandemic — as well as a call to leverage the organisation 'to capture best practices and work on common areas of interest (vendors, regulators, human resources, local infrastructure)'.¹⁹

This paper has shared some of the more obvious challenges for the US financial sector with an international audience in a journal devoted to issues surrounding disaster preparedness. It is hoped that this might be the start of a fruitful exchange across international borders. The publication of analysis and findings from the six-week British pandemic exercise conducted in 2006 is eagerly awaited; and the reader can look forward to other perspectives on pandemic planning in future issues of this publication.

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