



BUSINESS CONTINUITY PLAN

Version: XTENDBCP-v20180822-PU

*Confidentiality Statement: This document contains sensitive information regarding the operations of Xtend and the CU*Asterisk partner network. It may not be distributed without the consent of the Xtend Executive Team.*

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LEGAL DISCLAIMER

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NOTE

Data and information contained within this Plan (where applicable) has been provided by Xtend and CU*Answers in the form of electronic files/documentation and as the result of notes taken during conversations with key personnel. It is the responsibility of the Credit Union to maintain this Plan to ensure contents are accurate and current.

Introduction

This document is designed for the purposes of equipping and preparing Xtend and its partners for the expected impact of unplanned disruptions to business functions and processes and for contributing to the resiliency of operations.

The Xtend Business Continuity Plan is “a roadmap for continuing operations under adverse conditions (i.e. interruption from natural or man-made hazards)”. The plan is the primary tool used for preparedness training, testing and exercising. The best investment in business continuity management is a well-trained recovery team. The plan should be studied and its contents well known prior to the next disruption.

Portions of the CU*Answers Business Continuity Plan are included in the contents of this plan to support the recovery effort where appropriate.

Scope and Objectives

A disaster is a unique event and the provisions of this plan can be used as the basis for controlling specific recovery operations at management’s discretion. Execution of this plan will help facilitate the timely recovery of core processing critical business functions.

The core framework of this plan was developed with the following objectives:

- To protect personnel and property (assets)
- To minimize the financial losses to the organization
- To serve clients with minimal disruptions
- To mitigate the negative effects of disruptions on business operations

The procedures contained within have been designed to serve as a guide for responding to emergencies based on recognized standards and best practices, written with the FFIEC published recommendations in mind. Details about these recommendations can be found at the FFIEC website or at <http://ithandbook.ffiec.gov/it-booklets/business-continuity-planning.aspx>.

Confidentiality Statement

This plan is strictly confidential and is not to be shared with anyone outside the CU*Asterisk network without the express permission of the President/CEO. Full copies of the current Plan are kept by each management team member. All questions from the news media or other external sources regarding the plan or any disaster/incident should be directed to the Incident Manager or CEO.

*See “[Crisis Communications](#)” section.

Assumptions

The following assumptions have been considered during the creation of this recovery plan. The specific circumstances of any disruption may require modifications to the recovery effort.

- Key personnel have been identified and trained and are available to activate the recovery plan.
- Current backups of the application software and data are intact and available at a quickly accessible storage facility.
- Service agreements are maintained with the application hardware, software and communications providers to support the emergency system recovery.

Plan Maintenance

The Xtend Business Continuity Plan will be revised every twelve months or as needed based on:

- Changes in potential threats or risks,
- Considerable changes in business operations, functions, or processes,
- Considerable changes in system or network architecture,
- Audit recommendations,
- Lessons learned from tests, exercises and events.

Revised plans will be distributed to all Emergency Response Team personnel, Board members, and staff with direct roles and responsibilities within the plan. General information about the continuity plan and program may be referenced on the corporate web site and a sanitized version of the plan available to client credit unions upon request.

Revised on (Date)	Revised by:	Notes	Board Acceptance (Date)
8/14/2014	L. Winninger/ J. Lawrence	Initial draft for review	11/15/2014
8/11/2015	L. Winninger/ J. Lawrence	Annual refresh	8/31/2015
4/18/2016	L. Winninger/ J. Lawrence	Annual refresh	4/28/2016
3/14/2017	L. Winninger/ J. Lawrence	Annual refresh	3/23/2017
8/22/2018	L. Winninger/ D. Caliendo	Annual refresh	

Awareness and Training

To ensure all personnel are knowledgeable of the Plan and aware of their roles during a recovery effort, Xtend will commit a portion of annual management and staff meetings for educating employees as part of the ongoing business continuity planning cycle. In addition, training events and exercises for those with specific roles and responsibilities will be conducted as needed, particularly when any plan modifications have been made.

Training events will be documented and reported to the board annually.

Testing and Exercising

Recovery plans (or portions thereof) are to be tested regularly to:

- Ensure completeness and accuracy of the procedures within the plan.
- Identify area within the plan that are weak and require modifications to improve plan effectiveness.
- Provide training and practice for recovery teams.
- Demonstrate (building confidence in) our ability to recover critical functions meeting acceptable time objectives.

Types of testing may include:

- **Life safety exercises**
 - Examples are building evacuation or shelter-in-place drills.
- **Plan walk-through/tabletop reviews**

- Example is a plan review/walk-through with recovery team member(s) in a conference/meeting room environment.
- **Stand-alone exercises**
 - Recovery/relocation of a single business unit/department, single process/function, or single device/system.
 - An example would be testing VPN backup data communications to simulate an outage of the primary data communications line.
- **Comprehensive exercises**
 - A large-scale recovery effort such as rolling core-processing from the primary datacenter to the secondary datacenter.

All Xtend departments currently participate in CU*Answers recovery tests and preparedness exercises.

*Results of the HA rollover tests are published at: <http://www.cuanswers.com/solutions/business-continuity/auditing-and-testing/>

Executive Commitment

Board and senior management responsibilities in Business Continuity Planning include:

- Establishing policy by determining how the institution will manage and control identified risks.
- Allocating knowledgeable personnel and sufficient financial resources to properly implement the Business Continuity Plan.
- Ensuring that the Business Continuity Plan is independently reviewed and approved at least annually.
- Ensuring staff are trained and aware of their roles in the implementation of the Business Continuity Plan.
- Ensuring the Business Continuity Plan is regularly tested on an enterprise-wide basis.
- Reviewing the Business Continuity Plan testing program and test results on a regular basis.
- Ensuring the Business Continuity Plan is continually updated to reflect the current operating environment.

Corporate Environment



Xtend is a multi-owned Credit Union Service Organization (CUSO) that provides clients with a variety of strategic products, services, and partnerships. Xtend's corporate mission is to increase client's competitive advantage by providing the highest quality products and services at an affordable price.



Founded in 2002, Xtend's Board of Directors consist of credit union executives with a common vision of helping their industry peers stay relevant in the eyes of their members in an increasingly competitive marketplace. This vision translates simply - provide the highest quality service at a price point that sets us apart. Xtend's corporate value proposition focuses on four main objectives: communication, collaboration, connection and execution, with an overlying spirit of innovation that encompasses everything they do. By aligning Xtend's goals with their clients' business plan, they hope to help redefine the credit union's vision of what it means to be partners vested in each other's success.

Key Products and Services provided by Xtend include:

SRS Bookkeeping

- Base Services
 - Daily Share Draft, ACH, and ATM reconciliation, settlement and exception reporting
- Stand-in Support
 - Short-term back office support for holidays, vacations and staff shortages
- SRS 5300 Call Report Services
- CU*BASE Conversion/De-conversion Support

Mortgage/Loan Servicing (Lender*RE)

- Investor Reporting and Escrow Administration
 - Reconciliation, escrow analysis and payment, agency reporting for Fannie Mae, Freddie Mac, and FHLB portfolio loans
- Portfolio Conversion
 - Project management for conversions of portfolio from third-party service to CU*BASE

E-Communications Services

- Member Reach
 - Targeted electronic messages to members based on a predefined schedule of activities
- RevGen-HyperDrive 2.0
 - Loan campaign solution, combining E-Marketing, lobby marketing, and outbound call campaign to targeted members

- E-Info
 - Managed content library and delivery service that pushes credit union newsletters and marketing messages to the member
- Online Banking Community Stories
 - Managed content library and delivery services that pushes marketing content to the top of the story list located on the It's Me 247 Online Banking login page
- Data Analyst
 - Data mining and CU*BASE Tracker creation handled by Xtend; member calls made by the credit union staff
- HTML eStatement Notifications
 - Interactive eStatement notifications
- eNewsletter Service
 - Publication of monthly online eNewsletter delivered to members via email
- OLLE
 - Contest lead generation app for credit unions, OLLE generates inbound leads

Contact Center Services

- Branch XT
 - Inbound member service provided during Xtension business hours through overflow, after-hour, and/or fully engaged inbound call center
- Branch ST
 - Targeted outbound calls to members based on predefined schedule of activities
- XT Direct
 - Inbound loan lead hotline where Xtension agents feed CU*BASE MNLOAN pipeline directly
- CU*BASE Conversion Support
 - Inbound member support, outbound member contact
- Xtension Stand-In Support
 - Inbound member service designed to provide the possible support during significant branch outages (i.e. disaster recovery)
- Online Chat
 - Live Chat link deployed within It's Me 247 and/or on the credit union's website with interactions handled by Xtension agents

Partner Support Services

- Shared Branching
 - Marketing and oversight of the CU*BASE shared branching network.
- Digital Signage
 - Digital signage content creation and delivery through cloud-based managed solution.
- Debit Rewards
 - Buzz points member rewards program based on debit card usage.
- Two-Way Texting
 - Zip-Whip, a platform that provides two-way texting support directly from the clients' landline.

Xtend is an active member of the CU*Asterisk network.



Operational Environment

The Xtend corporate headquarters is located within the CU*Answers facility at:

6000 28th Street SE
Grand Rapids, MI 49546

At this location, Xtend leases approximately 6,000 square feet including 4 offices, 58 work areas/cubicles, conference table, shared board room and media center.

Xtend employs 56 staff members (mix of full and part-time) and serves 200+ credit unions.

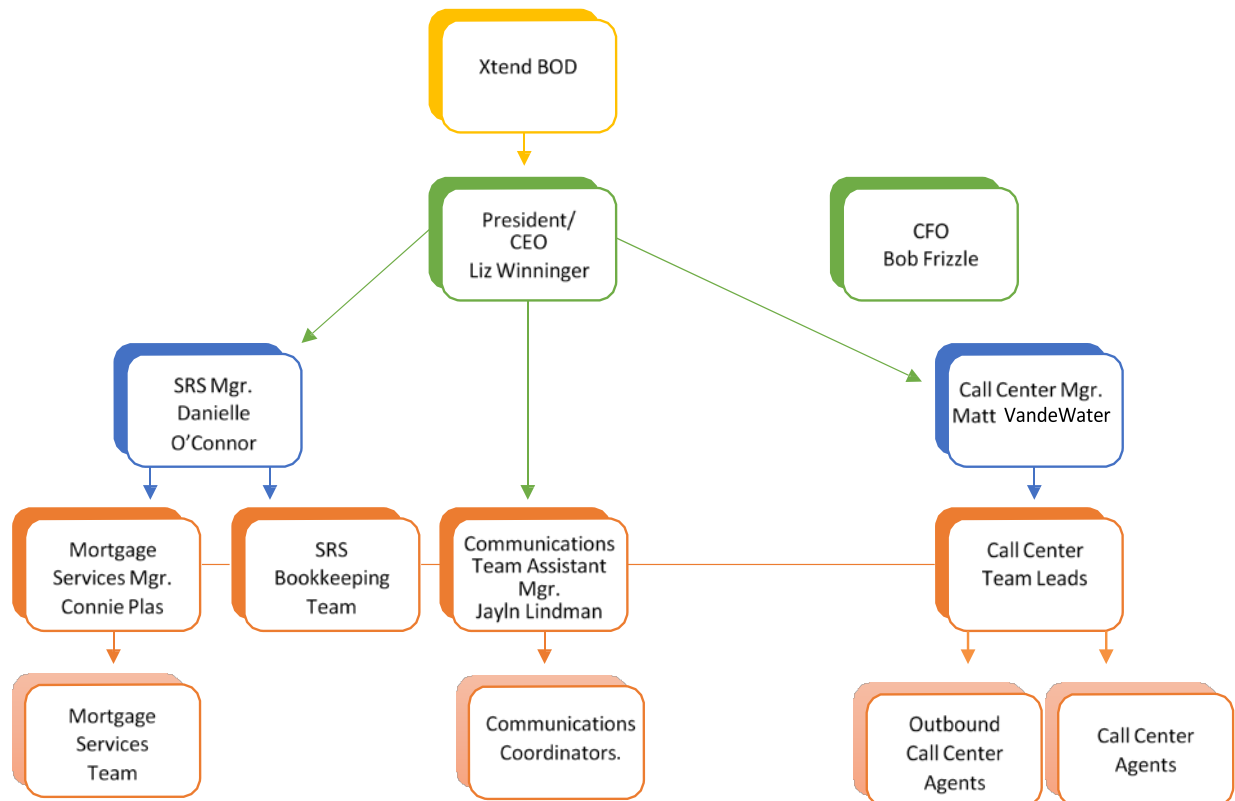
Hours of operation include:

Monday - Friday 7:00 AM to 8:00 PM
Saturday 8:00 AM - 5:00 PM

*Xtend also leases work area and employs # personnel at CU*Northwest's office in Liberty Lake, WA, and CU*South's office in Fairhope, AL.

Xtend Organizational Chart

(As of May 8, 2018)



CU*Answers

Like Xtend, CU*Answers is a CUSO and CU*Asterisk network partner. CU*Answers maintains three locations in Michigan and is the primary developer and vendor for CU*BASE/GOLD software. In addition to the corporate offices in Grand Rapids, MI, CU*Answers maintains a primary production datacenter in Kentwood, MI and secondary high-availability datacenter in Yankton, SD.

Xtend leases office space at the Grand Rapids location and services (identified below) from CU*Answers for daily operations.

[A]

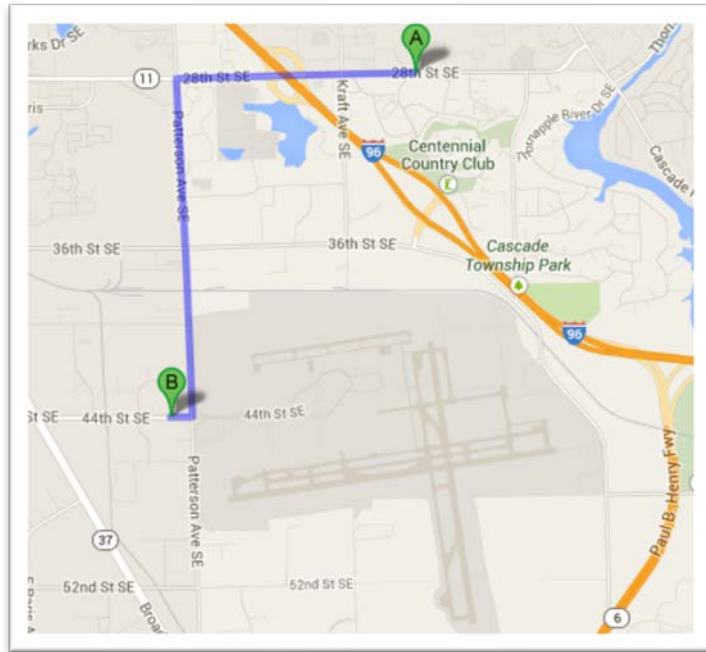
CU*Answers Corporate Office
6000 28th street SE
Grand Rapids, MI 49546
800-327-3478
x132 Operations (24x7)
x266 Network Services

[B]

CU*Answers Production Datacenter
4695 44th street SE
Kentwood, MI 49512
800-327-3478

[not shown]

Site-Four
CU*Answers HA Datacenter
608 Goeden Dr.
Yankton, SD 57078
605-689-4309



CU*Answers provides CU*BASE/GOLD core processing and many of the complementary products and services used by Xtend staff and clients including:

- It's Me 247 Home and Mobile Banking
- Corporate Email (Exchange)
- VoIP Phone System
- Corporate Web Site
- Internal Portal
- AnswerBook
- Move IT
- Imaging Solutions
- Lync Communicator
- Web Chat
- Internal File/Print Server

In addition, Xtend has contracted CU*Answers to provide support for critical business functions from many departments including:

- IT Support (network/system administration, programming, security, etc.)
- Client Services
- Crisis Communications (alerts, announcements, etc.)
- Sales Support
- Marketing (web. Print, etc.)
- Shipping/Receiving
- Facilities Management
- Compliance/Legal
- Accounting
- HR/Administration

CU*Answers maintains a separate Business Continuity Program with regular recovery testing. Information about the CU*Answers program including reports from recovery exercises and test can be found at: <http://www.cuanswers.com/solutions/business-continuity/>

Recovery at a Glance

Given the relationship with CU*Answers and the shared resources necessary to perform most of Xtend's critical business functions, all recovery efforts will require close coordination and communication between all recovery teams.

Possible scenarios considered for the purpose of this plan include:

- Loss of site or denial of access (no physical access to one or more sites)
- Loss of critical functions (service, department, vendor, supplier, etc.)
- Loss of power or other services (utilities, cooling, etc.)
- Loss of critical equipment (hardware/software)
- Loss of communications (data, voice)
- Loss of skilled personnel (injury, illness, pandemic)
- Breach of security (network/system compromise)

It's important to recognize that each incident is unique and requires careful assessment and an appropriate and coordinated response. Not every incident has the capacity to disrupt business functions but every incident has the potential to create an impact.

Key factors to consider when making decisions during an incident include:

- Safety of all personnel (evacuation, shelter, etc.)
- Security of data
- Availability of core services, including timing, expected duration of outage, etc.
- Proactive monitoring and controls to detect potential additional disruptions and to alert recovery staff
- Accurate initial assessment to enact proper plans and minimize downtime
- Existing service level agreements with clients and vendors
- Client and vendor expectations
- Each plan's inherent lead time (preparation, chasing down tapes, travel, etc.)
- Importance of the first few minutes and hours of an event
- Potential FUD factor (fear, uncertainty, doubt) of recovery teams, chaos during initial stages, remain calm
- The status of the work in progress at the time of the disruption

Several controls have been implemented during day-to-day operations in an effort to prevent, manage, control, and mitigate the impact of identified risks. During a disruption, additional inherent security risks must be considered such as:

- Reduced fault tolerance during the recovery
- Reduced redundancy of data during the recovery
- Compounded failures (snowball/domino effect, uncontrolled events have a tendency to escalate)
- Physical/network security at alternate sites
- Recovery team fatigue during lengthy recovery efforts

Additional financial considerations include:

- Lost revenue from service outage
- Need for temporary (skilled) staffing
- Equipment rental during the recovery efforts
- Extra shipping costs for moving equipment and materials
- Travel/lodging expenses for recovery teams and displaced staff
- Legal obligations for deadlines missed and service level agreements not met
- Overtime costs (labor) for staff and vendors
- Reputation/brand image (potential future revenue)

The sequence of events described below provides a summary of the reaction and recovery process to a disaster. It is designed to help management keep perspective amid the crush of details and problems that occur during the disaster and to educate staff who are not regularly involved in the disaster planning process.

The "[Emergency Response Team](#)" (identified elsewhere in this document) is responsible to coordinate an assessment of the situation as quickly as possible. The purpose of this assessment is to identify the scope of the disaster. Specific areas that must be evaluated are the condition and availability of staff members, condition and availability of facilities and the condition of key computer and business systems.

Steps for a typical disaster recovery effort include:

1. **Incident detected**
 - a. Invoke Emergency Response Plan if required.
 - b. Perform initial response to mitigate risk (fire extinguisher, fire alarm, power down, etc.).
 - c. Evacuate premise or seek safe shelter if necessary.
 - d. Call local authorities (911 or as appropriate).
2. **Establish chain of command**
 - a. A clear chain of command strategy should be determined prior to a disaster to anticipate scenarios where communication channels and/or select Management Team members are not available. It is important that this does not create a delay in key decision making, especially during the early stages of a recovery.
3. **Assess situation**
 - a. A quick and accurate assessment is required. Consider elements of the incident such as:
 - i. The availability and condition of staff members
 - ii. The condition and availability of facilities
 - iii. The condition of key computer and business systems and vital records.
 - b. Engage additional Emergency Response Units if needed (Fire, Police, EMT, etc.).
 - c. Escalate the incident if necessary.
4. **Declare crisis severity based on assessment (escalate)**
 - a. Consider scope and duration of disruption based on the results of the assessment.
 - b. Escalate based on scope and expected duration of outage (examples shown below):
 - i. 0-24 hours (Disruption)
 - ii. 24-96 hours (Emergency)
 - iii. 96+ hours (Disaster)
5. **Establish command and control of incident and recovery effort**
 - a. Setup command post (surviving site or other designated location).
 - b. Determine appropriate response to contain incident and initiate recovery plan both during and after business hours.
6. **Notify recovery team members**
 - a. Communicate to recovery team members the description of the incident, extent of damage, recovery location, and prioritized action plan based on the circumstances of the incident.
 - b. Invoke Contingency Plans if conditions warrant.
 - c. See "[Emergency Response Team](#)" section for recovery team leaders' contact information.
 - d. See "[Appendix](#)" for all-staff contact information.
 - e. Mobilize teams to alternate recovery location(s) if required.

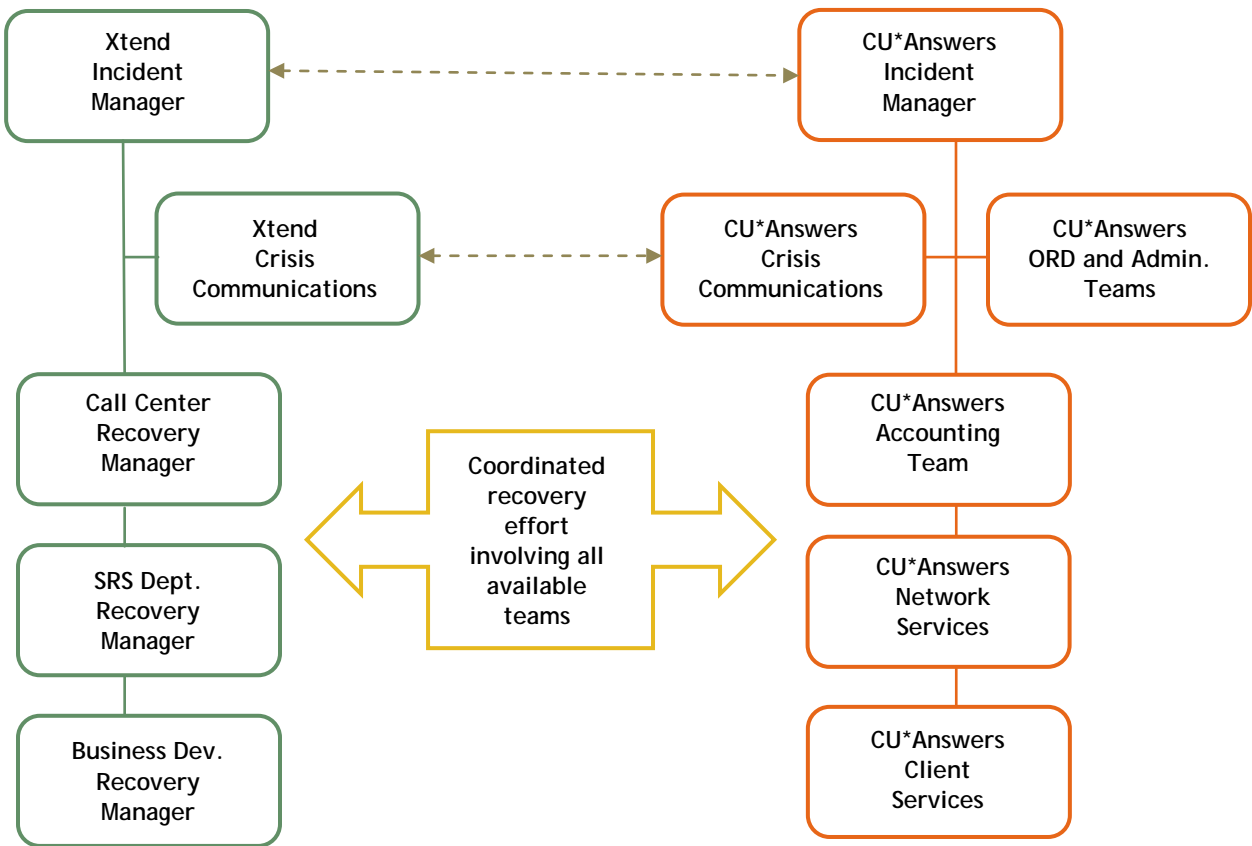
7. **Notify key stakeholders (members, vendors, media, etc.)**
 - a. See "[Crisis Communications](#)" section of Plan.
 - i. Send CU*BASE Alert and Announcement (or request CU*Answers to issue)
8. **Recover critical business functions**
 - a. Consider alternate recovery strategies based on circumstances of disruption.
 - b. Document and log recovery efforts including personnel hours worked.
 - c. Monitor and control all disaster recovery related expenses.
 - d. Provide status report to all recovery teams.
9. **Notify Insurance Claims Adjustor**
 - a. Notify Lighthouse Insurance Group.
10. **Recover remaining business functions**
 - a. Provide status report to all recovery teams and key stakeholders.
11. **Repair/replace facilities and systems (coordinated with CU*Answers)**
 - a. Direct and control all salvage efforts related to facilities and vital records.
 - b. Coordinate the restoration / building of permanent location.
 - c. Procure replacement equipment and supplies as necessary.
 - d. Schedule move back to main location.
12. **Return to permanent location**
 - a. Resume normal operations.
 - b. Provide status report to all key stakeholders.
13. **Assessment of response and recovery efforts**
 - a. Schedule debriefing meeting to evaluate the effectiveness of the disaster response.
 - b. Identify required modifications for Recovery Plan.
 - c. Prepare gap analysis report based on findings.

Roles and Responsibilities

An effective and efficient recovery requires skilled and trained personnel who are aware of their roles and responsibilities. The diagram and tables below show the Xtend and CU*Answers Recovery Teams and responsibilities of each. The Incident Manager has the authority to make changes as needed based on the circumstances of the event.

Perhaps the most important factor to ensure timely recovery is the quality and frequency of communication between recovery teams and management. It is critical that information is fed upstream to keep the decision-making team up to date on the status of the recovery efforts.

Staff emergency contact information is available in the "[Appendix](#)" section.



The following pages you will find specific responsibilities for each recovery team identified above. Each incident or crisis has its own unique set of circumstances and may require individuals and teams to perform multiple roles. It is important that each team is knowledgeable and trained to perform these and other tasks assigned to ensure a timely recovery.

Incident Manager	Responsibilities
<p>★ President/CEO</p> <p>CU*Answers as needed (Incident Manager)</p>	<ul style="list-style-type: none"> • Oversee efforts of all resumption teams and ensure that recovery goals and timelines are met • Establish command/control center for management of incident • Primary decision maker on the invocation of the Emergency Response and Recovery plans • Serve as liaison to the Board of Directors • Communicate with recovery teams to inform them of strategic direction and the status of the recovery efforts • Resolve issues of priority based on evolving circumstances • Determine message communicated to external media • Oversee initial damage assessment and approve major equipment purchases • Offer guidance to local authorities, utilities, services, etc. • Locate and confirm alternate site selection and availability • Oversee, review, and approve any facility's renovation and construction • Inform and update Executive Team on recovery status

Crisis Communications	Responsibilities
<p>★ Business Development Manager</p> <p>CU*Answers as needed (Writing Team)</p>	<ul style="list-style-type: none"> • Serve as communications point of contact for the entire organization with external media relations (TV, print, web, etc.), public affairs, etc. • Serve as a conduit for all internal communications to and from executive and technical teams, alert staff, clients, major vendors, etc. • Message content creation and distribution (official company holding statements to minimize adverse publicity) • Organize internal meetings/briefings on recovery status (distribute recovery plans as needed) • Inform and update Executive Team on recovery status • Assist CU*Answers ORD and Administration Teams in communications with personnel and families

Department Recovery	Responsibilities
<p>Call Center Manager SRS Manager Business Dev. Manager</p>	<ul style="list-style-type: none"> • Assess scope of disruption and the impact specific to your department's operations • Identify critical functions based on the circumstances of the disruption • Inventory which resources are available and what is needed • Communicate status to Incident Manager • Mobilize team to available recovery workspace • Assist other recovery teams as instructed by Incident Manager • See "Department Relocation/Mobilization" • Inform and update Executive Team on recovery status

ORD/Administration	Responsibilities
<p>CU*Answers (ORD and Administration Teams)</p>	<ul style="list-style-type: none"> • Arrange travel, lodging, meals, and miscellaneous purchases for recovery staff as needed • Ensure proper office working environment for recovery staff at all facilities • Ensure injured/ill personnel receive prompt medical attention, families notified, etc. • Ensure all personnel/family issues are resolved (attendance, payroll, insurance/benefits, legal, etc.) • Answer questions about payroll continuation, employment, or securing temporary personnel during the recovery operation • Ensure workers compensation claims are properly filed and processed • Verify hours worked for staff and schedule sufficient time off • Hire temporary personnel as required • Inform and update Executive Team on recovery status

Accounting	Responsibilities
<p>CU*Answers (Accounting Team) (Logistics Team)</p>	<ul style="list-style-type: none"> • Ensure adequate cash flow for expenses during recovery • Contact supply vendors to increase credit limits and expedite shipping due to nature of event • Establish emergency accounting and purchasing procedures • Aid in all monetary details associated with the recovery operations, recording of expenses, post recovery cleanup, intermediate emergency credit arrangements, petty cash, travel advances, etc. • Act as liaison with insurance agency to document, file and settle claims Inform and update Executive Team • Purchase, receive, store, distribute all software, equipment and supplies, etc. • Maintain interface with supply channel vendors • Establish mail services area to handle mail for recovery personnel and express-shipping functions at all locations • Verify and maintain all receipts and paperwork • Inform and update Executive Team on recovery status

Network Recovery	Responsibilities
<p>CU*Answers (Network Services Team)</p>	<ul style="list-style-type: none"> • Recover network infrastructure (LAN/WAN, etc.) including data and voice communications • Ensure network/data security and availability • Order, install, and configure networking equipment as needed • Confirm recovery-site data-communications lines specifications • Recover archived data environment and restore data from media for server and application recovery • Ensure the archiving of data during recovery efforts to protect against loss in disruption reoccurrence • Recover/restore servers and appliances for critical business applications and services • Inventory damaged and undamaged items, determine salvageable status of equipment • Identify and inventory damaged or destroyed equipment for insurance and replacement purposes • Repair, replace, install, configure all internal network user hardware (workstations, printers, etc.) • Make repair/replacement recommendations • Mitigate damage to remaining equipment and facilities • Oversee cleanup and restoration of damaged equipment and supplies • Coordinate ordering/receipt of replace • Organize the transportation of supplies, data, equipment, and personnel • Assist in establishing/preparing temporary facilities during recovery efforts • Coordinate movement and storage of salvageable items • Inform and update executive team on recovery status

Emergency Response Plan

Initial response to a (potential) incident is key to an effective recovery

No document can contain all of the practical responses for the wide variety of circumstances related to all potential incidents. The emergency response Plan provides critical information and a prioritized list of procedures to be performed for a variety of scenarios with the common goals of:

- Safety of personnel (staff and guests)
- Security of data
- Protection of assets

The “Emergency Response Team” is a group of people who are prepared for and respond to any emergency incident, such as a fire and explosion or an interruption of business operations. An accurate and prompt Initial assessment and response during the first few minutes are critical to minimize impact and injury.

A disaster may be declared and this Plan activated by the Incident Manager of any member of the Emergency Response Team.

For building service outages (power, communications, etc.) contact:

[CONFIDENTIAL]

Emergency Response Team

Name	Position	Cell Phone	Alt. Phone	Recovery Role
Liz Winninger	CEO	[CONFIDENTIAL]	[CONFIDENTIAL]	Incident Manager/Crisis Communications
Matt VandeWater	Call Center Mgr.	[CONFIDENTIAL]	[CONFIDENTIAL]	Call Center Recovery
Danielle O'Connor	SRS Manager	[CONFIDENTIAL]	[CONFIDENTIAL]	SRS Recovery
Jalyn Lindeman	AM of Communication Services	[CONFIDENTIAL]	[CONFIDENTIAL]	Communications Services Recovery

*See “[Appendix](#)” for staff emergency contact information

CU*Answers Emergency Contact Information

Name	Position	Cell Phone	Alt. Phone	Recovery Role
Randy Karnes	CEO	[CONFIDENTIAL]	[CONFIDENTIAL]	Incident Manager
Bob Frizzle	CFO	[CONFIDENTIAL]	[CONFIDENTIAL]	Business Recovery
Jody Karnes	CIO	[CONFIDENTIAL]	[CONFIDENTIAL]	IT Recovery
Geoff Johnson	COO	[CONFIDENTIAL]	[CONFIDENTIAL]	Client Services Recovery
Scott Collins	EVP	[CONFIDENTIAL]	[CONFIDENTIAL]	Sales and Marketing
Dave Wordhouse	EVP Net. Tech	[CONFIDENTIAL]	[CONFIDENTIAL]	Network Recovery
Jack Carpenter	VP Operations	[CONFIDENTIAL]	[CONFIDENTIAL]	Operations Recovery
Chris Cudak	Facilities Mgr.	[CONFIDENTIAL]	[CONFIDENTIAL]	Facilities
Chris Shelton	Network Services	[CONFIDENTIAL]	[CONFIDENTIAL]	Network Services
Jim Lawrence	VP DR/BR	[CONFIDENTIAL]	[CONFIDENTIAL]	Business Continuity

*See “Appendix” for staff emergency contact information

Responsibilities of Emergency Response Team include (or delegation of):

- Identify the disruption.
- Assess the damage (facilities, equipment, services, etc.).
- Decide whether a disaster is to be declared.
- Alert recovery teams (keep track of mobilized personnel).
- Locate and confirm alternate site selection and availability.
- Adapt the Plan to account for prevailing circumstances.
- Prioritize recovery steps.
- Initiate, control and coordinate recovery operations.
- Initiate communications with internal and external stakeholders.
- Approve expenditures related to the recovery process.
- Procure the replacement of destroyed or damaged equipment.
- Offer guidance to local authorities, utilities, services, etc.
- Review critical milestones during the recovery process.
- Document and log events as they occur.
- Provide recovery status information to management and board of directors.
- Assemble and verify information for the Crisis Communications Team, who will control its release to stakeholders.

Establishing Command and Control

Most incidents are relatively small in impact and have a short duration period. For example, a power outage, though somewhat frequent in occurrence (once or twice each year) is short lived (90% less than one hour) with an impact that has been dampened with the deployment of controls such as redundant power sources (UPS and generator). Other incidents can have a much greater impact but may be less frequent (building fire or explosion) however, they still require immediate action to limit and prevent injury and damages. With each incident, our response may be different but the priorities are still the same.

Priorities:

1. Safety of personnel (staff and guests)
2. Security of data
3. Protection of assets

Once an incident is detected, it is important to establish command and control early in the recovery effort. Normal reaction may be that of confusion and chaos in an emergency situation. Therefore, coordination of personnel and resources during emergencies is a critical function of the **Emergency Response Team**.

The Emergency Response Team will establish a Command Center upon declaration of a disaster event. Alternative locations to the main office include surviving space at the 28th Street location (possibly the garden level) or a building equipped to accommodate the recovery efforts. The location will be disseminated to staff via established call tree processes and as specified in the Crisis Communications section.

Typical items necessary at a command center may include:

- Office supplies (pens, paper, paperclips, envelopes, files, folders, staplers, etc.)
- Fax/printer/copier (with supplies - paper/toner)
- Folding tables and chairs
- Whiteboard and dry-erase markers
- Check stock and specialized forms

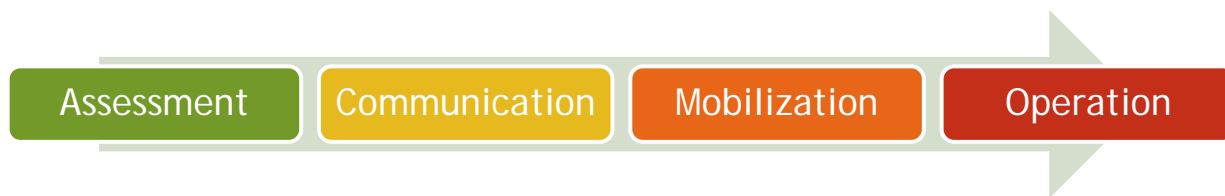
Emergency Response Checklist

- Conduct initial status meeting with Recovery Team leaders.

- ❑ Determine the extent of response and recovery actions to be performed.
- ❑ Establish frequency of communications to provide support and on-going status of current response and recovery activities.
- ❑ Observe all staff behaviors and as needed provide periods of rest and relief to relieve stress and correct inappropriate behavior.
- ❑ Maintain a log of recovery activities (problems encountered, suggestions for improvements to the plan) of each business function affected.
- ❑ Conduct an initial assessment.
- ❑ Determine the status of the work in progress at the time of the disruption and provide a status update to the stakeholders and management.
- ❑ Perform damage assessment.
- ❑ Determine criticality of damaged/destroyed items or components (salvage).
- ❑ Cell phone cameras can be used to document disaster area damage.

Department Relocation/Mobilization

The following example checklist has been provided for recovery team leaders to use as a guide during incidents where department relocation and mobilization is required.



Phase I: ASSESSMENT

- Receive initial disaster alert and instructions.
- Assess scope of disaster and what it means to my department (which services not available, expected duration, etc.).
- Activate department recovery plan as needed.
- Inventory which resources are available and what is needed.
- Identify obligations for assisting in the organizational-level recovery.
- Communicate to Business Recovery Manager what resources are needed and when.

Phase II: COMMUNICATION

- Notify team members of the situation.
- Verify who is available for work and when.
- Communicate if current staffing levels are adequate for recovery and operations.
- Request additional staffing if necessary.
- Re-assign unused personnel to assist in the organization-level recovery.
- Provide instructions for reporting to work (who, what, where, when).
- Provide any requests to the Administration Team for any transportation, lodging and food needs.
- Provide any requests to the HR Team for any personnel related needs.
- Coordinate with Crisis Communications Team for any external stakeholders (vendors, clients) who need to be contacted.

Phase III: MOBILIZATION

- Report to alternate location and assess the workspace recovery area.
- Establish communications methods between team members and frequency.

- Provide instructions for prioritized department recovery to each team member.
- Establish a staff schedule rotation at the alternate location during the recovery process.
- Coordinate the delivery and setup of required resources (equipment, supplies, etc.).
- Document problems encountered and corrective actions taken.
- Maintain records and receipts of all recovery related costs and expenses.
- Monitor and log the recovery process (or delegate).
- Communicate status to Business Recovery Manager (periodically as directed).

Phase IV: OPERATION

- Perform interim operation procedures (critical functions) at temporary location.
- Establish a staff Incident Manager (periodically as directed).
- Prepare for relocation to permanent location once available.
- Document problems encountered and corrective actions taken.

Declaration of Disaster

For incidents where long-term outages and high impact are expected, engaging and mobilizing recovery teams and invoking the proper recovery plan quickly is imperative. This decision is most likely performed by the Incident Manager or member of the Senior Management Team in conjunction with CU*Answers Emergency Response Team.

Continuity Insurance

Insurance allows for the organization to recover losses that cannot be completely prevented and expenses related to recovering from a disaster. Insurance coverage is obtained for risks that cannot be entirely controlled, yet represent a potential for financial loss or other disastrous consequences.

Evaluation of Insurance Options

To offset potential losses, CU*Answers has purchased insurance coverage for identified perils. This coverage is referred to as business-interruption or additional-expense insurance. Exposures not addressed by insurance will be taken into account in the Business Recovery Plan.

There are two basic types of insurance: property coverage and time-element coverage. Property coverage covers buildings, personal property, and equipment and machinery. Time-element coverage covers such items as business income, extra expenses, leasehold interest, and rental value. CU*Answers maintains both types of insurance coverage.

Covered Perils:

- Explosions
- Fire or lightning
- Leakage
- Mine subsidence
- Riot or civil commotion
- Sinkhole or collapse
- Smoke
- Vandalism
- Volcanic action
- Wind or hail

Extensions to Normal Coverage:

- Electrical arcing

- Falling objects
- Glass breakage
- Mechanical breakdown
- Steam explosion
- Water damage
- Weight of ice, snow, or sleet

Property Coverage:

The value of insured assets is generally determined by a combination of methods including actual cash value, replacement-cost value, functional-replacement value, and book value.

Time Element Coverage:

The expenses incurred during the recovery of critical functions. Examples include: business income -the loss suffered because we cannot provide our services.

Extra Expenses:

Coverage for those expenses that are beyond the normal operating expenses required to continue operations when premises are damaged during an interruption. The damage must be caused by an insured peril. Examples include:

- Disaster-declaration fees
- Rent for alternative office site
- Rent for fixtures, machinery, and equipment
- Light, heat, and power at temporary locations
- Insurance at temporary locations
- Moving and hauling
- Installation of operation at temporary location
- Employee expenses
- Administrative expenses
- Emergency command-post expenses
- Operating expenses

Insurance Agency:

Emergency Contact Information

[CONFIDENTIAL]

Emergency Response Procedures

Response procedures are identified below for the following scenarios:

- Fire/Explosion (requiring building evacuation)
- Severe Weather (requiring seeking safe shelter)
- Flood and Water Damage
- Power Outage
- Injury/Illness/Mass Absence (Pandemic)



Fire/Explosion

Excerpt from CU*Answers Emergency Response Plan

When a potential crisis is identified that requires the evacuation of building occupants for safety reasons, all persons should exit the building and at the designated assembly area, the visitor parking area. This is a safe distance from the premises and out of the way of arriving emergency services. When evacuating the building, all occupants should attempt to perform each of the procedures listed below providing it does not increase risk of injury:

Building Evacuation Procedures:

1. If you see a fire and/or smell smoke, report it to a manager immediately.
2. Engage the fire alarm if the situation warrants to alert others in the building.
3. If time permits, quickly grab your personal items (jacket, purse, cell phone), set your phone on DND (and power down your workstation if not a drill).
4. Begin the evacuation process using the closest escape route. If route is blocked, use an alternate route.
5. Assist guests and others who are experiencing difficulty evacuating the building.
6. Report to the assigned assembly areas and check in with your manager (or supervisor).
 - a. Designated assembly areas include:
 - i. 28th street - guest/handicap parking area in the south parking lot
7. Provide any information you can of issues noticed during the evacuation or of persons still in the building.
8. Remain out of the way of emergency rescue personnel.
9. Do not re-enter the building until the "all clear" has been issued by the Evacuation Marshal (CFO or acting officer).
 - a. Silencing the alarm does not mean the emergency is over.

Copies of the plan have been distributed to emergency evacuation team members identified within this plan and are available at the front desk. Details of the plan are included in EPP education classes and on the portal. Evacuation drills are to be exercised on a semi-annual basis.

Purpose of evacuation drills:

The purpose of the evacuation drill is to:

- Educate the building occupants on emergency evacuation procedures;

- Assist in the evaluation of emergency plans (strategy, communications, etc.); and
- Identify potential issues with the means of egress.

Familiarity increases the probability of a successful evacuation during an actual emergency.

What you need to know:

Fire is always unexpected. A fire typically takes about 90 seconds to establish itself as a serious danger. Within five minutes it can get out of control. Quick response is required by a trained staff. A fire suppression system has been installed to detect and suppress fires (slow the spread) and alert occupants. Many minor fires can be put out with the prompt use of a fire extinguisher.

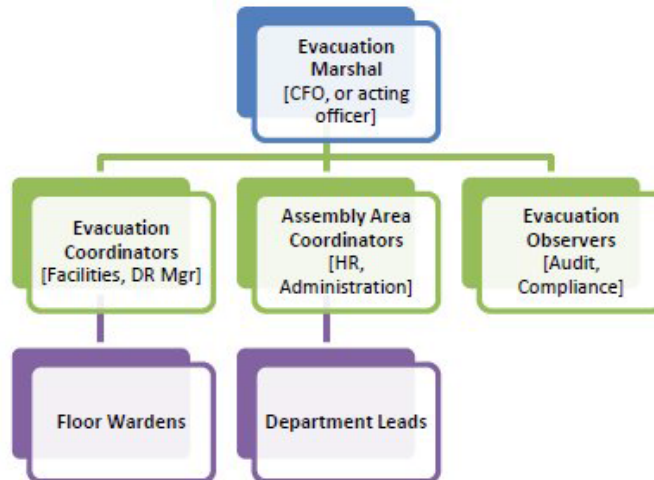
- Know how to detect and report a fire to alert others in the building.
- Remain calm. A disorganized evacuation can lead to confusion, injury and property damage.
- Reporting to your supervisor at the proper assembly areas helps eliminate the need for dangerous search and rescue missions.

Confusion and panic can settle in once it's learned that the emergency is real.

- Always have at least two escape routes in mind in case the first one is blocked.
- Test doors for heat by placing the back of your hand on it (not the palm of your hand or fingers).
- Do not open a hot door. Seek an alternate escape route or take evasive actions such as crawling under a smoke layer in a corridor.
- Avoid using elevators when evacuating a burning building.

Roles and responsibilities:

In the event of an evacuation, everyone has an important role to play.



Emergency Evacuation Teams

All Staff:

- Evacuate the premises in a calm and orderly fashion once the alarm sounds,
- Report to your department lead at the designated assembly area to make known your safety and whereabouts,
- Assist any guests that are with you,
- Report any issues to key personnel listed below, and
- Engage the use of fire extinguishers if required.

Department Leads/Floor Wardens: [All department managers or acting managers]

- Ensure that your team (and guests) evacuates according to the procedures listed in the evacuation plan,
- Ensure that interior doors in your department are closed but not locked,
- Report that your team is accounted for and any issues to the Assembly Area Coordinators, and
- Engage the use of fire extinguishers if required.

Assembly Area Coordinators: [Members of the ORD and Administration teams]

- Provide leadership at the assembly areas,
- Collect reports from each Team Lead,
- Arrange for medical assistance for anyone in need,
- Report any missing personnel or other issues to the Evacuation Coordinators or Evacuation Marshal, and
- Front lobby personnel to contact 44th street to inform them of the situation.

Evacuation Coordinators: [Facilities Manager, Disaster Recovery Manager and other designated trained personnel]

- Assist the Evacuation Marshal in overseeing the evacuation,
- Communicate issues to key personnel,
- Coordinate with outside emergency services,
- Transmit "all clear" signal to staff once granted by Evacuation Marshal,
- Engage the use of fire extinguishers if required, and
- Conduct post-evacuation debriefing meeting.

Evacuation Observers: [Internal Auditor and Compliance Team]

- Audit the evacuation process during drills to ensure compliance,
- Record event timeline and issues,
- Report issues to Evacuation Marshal, and
- Identify areas of improvement.

Evacuation Marshal: [CFO or acting officer]

- Oversee the evacuation,
- Establish the chain of command,
- Communicate with outside emergency services,
- Provide leadership and direction for all emergency teams,
- Engage the use of fire extinguishers if required, and
- Communicate "all clear" signal once granted by emergency services.

Building Evacuation Map

[MAP CONFIDENTIAL]

Severe Weather/Shelter-in-Place

Severe building damage and personal injury can occur during a severe weather event including:

- Lightning
- Tornado/high winds
- Snow/ice (dangerous driving conditions)
- Fog (dangerous driving conditions)

The top priority of the Emergency Response Plan is the safety of all personnel (staff and guests).

First aid kits are located in the kitchen area on each level of the building.

If a disruption to operations is foreseen, an alert should be posted for all clients and stakeholders (see "[Crisis Communications](#)" section).

Tornado/High Winds

If threatening winds (tornado, etc.) are present, all building occupants (staff and visitors) are to seek shelter in a location away from glass or other flying debris, preferably near the bottom of the east stairwell or on the garden level, until an all clear is given.

No building occupant shall be permitted to leave the shelter area or the building until directed by management.

Lightning/Storm

If severe lightning is present, all personnel are encouraged to remain indoors and away from windows.

Hazardous Driving Conditions

If severe driving conditions are present (fog, snow, ice, etc.), personnel are encouraged to remain indoors until conditions improve.

Flood/Water Damage

Excess water and flooding can cause damage to multiple areas in the building, including the computer rooms. Repairs for structural damage can prevent staff from returning to their work areas. In severe cases, where large areas of flooring and drywall are in need of replacing, renovation can take up to 30 days or more.

Sources of water can include:

- Restroom (sink, toilet, water feeds, etc.)
- Kitchen (sink, dishwasher, etc.)
- Ceiling (water source and drain pipes, roof leaks, AC unit condensation leaks, etc.)
- Exterior doors, windows and walls where water retention is possible
- Floor drains (failed sump pump)
- Fire rescue efforts (sprinkler system or fire hoses)

Damage can occur to:

- Electrical systems (building and computer room)
- Structure (weakening walls, floors, etc.)
- Paper documents
- Electronic media (tapes, hard drives, etc.)
- Computer hardware (i.e. corrosion)

In the event of flooding or other water damage:

- Determine if the Building Evacuation plan needs to be activated.
- Determine proximity/risk to computer room (power off equipment as necessary).
- Cover equipment with plastic tarps to protect from roof leaks (warning about humidity and corrosion on computer equipment).
- Determine source of water (roof, pipe, drain, wall, floor, etc.) and location of water-source shut off.
- Determine if sump-pump is functioning properly (between elevator and computer room on west side of building).

During the recovery efforts:

- Ensure that any hardware that is determined to be unsafe to operate is properly labeled. If determined to be safe, unplug equipment from the power source.
- Do not simply power equipment up until you are sure that any moisture has been removed.
- Visually inspect equipment for external and internal damage. Do not power up any equipment prior to passing this inspection.
- Secure media in dry storage area.

Power Outage

From CU*Answers Power Interruption Response Plan

What to do first:

1. Take a breath, relax, and think. Repeat this step before taking any action.
2. Senior manager on duty at the affected site should ensure all officers (Randy, Geoff, Bob) are aware of the outage, and contact the staff on duty in the Operations center.
3. Operations should contact Consumers Energy to report power outage/determine restoration ETA. Communicate findings to senior manager on duty.
4. Ensure someone is positioned in the main lobby to greet guests because the doorbell does not work in a power outage. Extra flashlights are available in the main lobby as well.

Staff should:

1. Come to work as usual, if the outage occurs before work starts.
2. Report to their direct supervisor or department manager for instructions.
3. Read this document thoroughly; copies will be available from the main reception desk.
4. Read Xtend's Power Interruption Response Plan thoroughly.
5. Stay away from areas where staff are handling the phones; avoid congregating in the CSR area, Systems CSR area, Xtend call center/SRS/Collections areas, etc.
6. Refrain from adding extension cords and power strips to stations powered by the generator (power from the generator is not unlimited!).

7. Assuming the phones are working, use their personal phone to update their voicemail message and current status:
 - a) [Procedures CONFIDENTIAL]
8. Contact any clients with whom they have direct meetings/calls scheduled that day (see also Cancelling Special Events below).
9. Unplug any equipment vulnerable to damage from surges when the power comes back on.

Alerting clients:

Assuming web servers are up and that staff on the generator or using laptops is able to connect to the network, wait at least 30 minutes after the power goes out before posting an alert.

- Do not panic. Take a little time to determine whether it's a momentary glitch or a real outage.
- If the power goes off overnight, an alert should be posted between 7:00 and 8:00 a.m. ET. It is not necessary to send an alert in the middle of the night.
- Do not send an alert unless you have something to say.
- These people are responsible for posting an Alert to clients <http://alerts.cubase.org>
 - Writing Team (Andrew or Dawn)
 - QC (Pauline)
 - Ops (Todd or Jeff)

(Make sure to check both Online and Self Processing, and if possible don't forget to send the accompanying email.)

Cancelling special events:

If the power failure occurs on a day when a special event is scheduled where clients will be visiting our location, the team/person hosting that event should use the following questions to determine a course of action:

1. Have people already started to arrive or has the event already begun? Host should consider the unique situation and make a decision.
2. Is the power outage expected to last more than a couple of hours? If so, cancel the event.
3. Is there time to possibly stop travelers from leaving home? If so, contact attendees. Receptionists will have hard copies of attendee lists with emergency contact numbers printed as of 4 pm the day before.
4. Post an alert; mention that further communication will be sent once a reschedule date is determined.
5. After power is restored, the host is responsible for following up in order to reschedule and request the usual client communications from the Writing Team, etc.

Rules of thumb: Do not scramble around to try and move everyone to another site. Keep it simple and be mindful of cost. Relax and communicate that we're following our standard procedure for situations like this.

Working on building generator power:

All works areas (PCs, phones, etc.) in the Xtend suite are connected to the building generator and will continue to operate during a power failure (a reboot is required for those without battery backup).

Department managers must coordinate allocation of extra workstations such as empty cubicles at 44th St. and training workstations if needed.

Individual departments must have a plan for their own team's response and capabilities. The Internal Networks team is NOT responsible for deciding which workstations can be connected.

Tips for managers:

- Find out which other leaders are in the building or how they can be reached. Know who the senior manager on duty is. Stay in touch with that person (for power restoration updates, etc.)
- Before you give permission to anyone on your team to use someone else's powered workstation or connect to the generator power, contact other key leaders in the building and coordinate priorities. You may need to negotiate based on demands on other teams (such as if there's a new client conversion in progress).
- Flashlights are available at the main lobby reception desk.
- Make sure your team knows what you want them to do first. Should they call you? Wander into your office? Talk to their direct supervisor? Pack up immediately and go home? Pick an area for your team to congregate (away from people on the phones!); they should know to go there automatically.
- Do you have contact numbers for everyone on your team (and do they have yours)?
- Stay positive. A simple power outage is not a disaster, and for most teams it will be no different than a case in which someone calls in sick. Once you sort out and address the truly urgent tasks, meetings can usually be rescheduled, and priorities can be shifted. It is your responsibility to reassure your team and avoid unnecessary angst. You don't want to be the manager that overloads the generator or communicates the wrong message to a client because you overreacted.

Personnel Injury/Illness/Mass Absenteeism (Pandemic Policy)

In the event of injury to personnel (staff or guest):

- Determine if medical help is required.
- Ask for CPR qualified individuals if necessary.
- First aid supplies kits (including AED) are located on each level in the kitchen area.
- Contact ORD who will contact family members if needed.
- Record identity of eyewitnesses and notes from event.

Instructions for Dialing 911

Remain calm and collected and:

- State "I have an emergency." (Wait for a reply.)
- State the type of emergency.
- State your name and number.
- State the exact location of the emergency.
- State if assistance is required (medical, fire, police, etc.).
- State the number of injured persons.
- State if a hazardous condition exists at the scene.
- State who is at the emergency scene.
- Wait for instructions before hanging up.

Pandemic Policy (adopted from the CU*Answers Pandemic Policy)

In June of 2009, the NCUA issued a letter to credit unions, Letter No.: 09-CU-13, requiring credit unions to augment their disaster recovery plans. The letter specifically speaks to the potential operational problems associated with a large-scale pandemic or hurricane. The letter requires credit unions to adopt a response to these events and evaluate the potential risk to the organization including an evaluation of critical-service-provider plans for operating during a large-scale absence event.

This document describes the procedures and controls implemented by Xtend to provide for continuation of business operations necessary to support our clients and partners should a large scale-absence impact our staff.

Definition

A large-scale absence, for purposes of this document, is defined by Xtend as missing 50% or more of the employee population for a period of up to two consecutive weeks.

Method

Team leaders were asked to assess specific needs and concerns that they would face in a large-scale absence event for their area(s) within the company. These needs and concerns, the response or reaction to those concerns, and any preventative measures that can be taken have been used in the development of this planning document.

Possible Delays in Service (longer than normal wait before the phone is answered, longer than normal responses to questions that require research, etc.)

Delays in servicing our clients should be expected. However, we would want to communicate this to the client appropriately by sending out a scripted message using our Alert procedures. Management would be key in assisting the employees in prioritizing the workload.

Coverage of All Shifts

Cross training and management involvement will help the client service areas to make sure all necessary shifts are covered across all areas of the company. Employees and managers who have the capability to work from home would be encouraged to do so, if the situation allows.

Prioritizing Daily and Pending Duties

Consider the time of the month—there might be things that must be done as they are time sensitive.

For instance, is it end of month? If so, divert team members across departments.

Management would make decisions on readjusting the priority list and delay of non-critical project travel.

At the Client Site

Scenario #1: The entire conversion team is “down for the count”. What happens at the client site?

Until additional staff can arrive on site, web and phone conferences would have to be utilized for training, support, sign-off etc. Several concurrent sessions could be scheduled to facilitate training by department.

Depending on the location of the credit union, the VP of Delivery Services may tap other CU*Answers credit union employees as support staff.

Scenario # 2: What if the Credit Union is going through an event? What would we do for sign offs?

Past experience does give us some guidance in this situation; we can use CPAs and Board members as alternatives to a CEO for sign-off authorization.

Additional support may have to be rescheduled for a particular department. For example, 'live week' may be postponed if several credit union employees are unavailable for the necessary training.

Communication

The determination that Xtend is experiencing a large-scale absence event will happen at the management level. In such an emergency, after having received authorization from senior management, clients shall be notified via email alert.

The scripted alert will read:

Dear Credit Unions,

*We are notifying you via our Alert system that CU*Answers/Xtend is experiencing a large-scale absence of staff due to extenuating circumstances. As a result of this, you may experience delays. If the person you are trying to contact cannot be reached or you need immediate assistance, please call the CU*Answers/Xtend operator and they will be able to help you or direct you to someone who can in a timely manner. Thank you for your patience.*

Management Team

Managers will be responsible for communicating to their staff members any new priorities or changes in responsibilities resulting from the event.

Travel during a Management Declared Event

The travel expectations during an event will be decided upon by the Xtend Management Team and communicated to the employees by ORD. Depending on the circumstances surrounding the event, any decision could be made up to and including the suspension of all travel.

Staff Interaction during an Event

The staff interactions during an event will be decided upon by Xtend Management Team and communicated to the employees by ORD. Depending on the circumstances surrounding the event, decisions will be made regarding:

- Severely discouraging or disallowing large assemblies of employees (on or off work premises)
- Closing all meeting rooms
- Limiting all staff interactions as much as possible
- Encouraging or forcing employees to work at home or at other CU*Answers offices
- Offering masks and setting up cleaning stations around the office
- Specifically Addressing the Flu Season: Controlling the spread of infection

In order to limit the spread of infections, Xtend encourages:

- Infected staff should defer coming to work for the length of the incubation period of the virus.
- Staff should utilize the hand-sanitizing stations provided around the office and wash hands often.
- Clean keyboards and other equipment, especially if workstations are shared between staff members.
- A certain degree of social distancing could be practiced; reducing frequency, proximity, and duration of contact can also help reduce the spread.

Planning, then, is essential. This large-scale planning document outlines how the different areas of operation will handle mass absences.

NCUA LETTER TO CREDIT UNIONS
NATIONAL CREDIT UNION ADMINISTRATION
1775 Duke Street, Alexandria, VA 22314

DATE: June 2009 **LETTER No.:** 09-CU-13

TO: Federally Insured Credit Unions

SUBJ: Hurricane Preparedness and Pandemic Planning

Dear Board of Directors:

The purpose of this letter is to inform credit union management to update their Business Continuity and Disaster Recovery Plans because of recent announcements by the National Hurricane Center (NHC) and Pandemic events related to the H1N1 virus (swine flu).

On May 21, 2009, the NHC predicted a near-normal Atlantic hurricane season for 2009. Forecasters predicted a seventy percent chance of nine to fourteen named storms, of which four to seven could become hurricanes, with one to three major hurricanes. The outlook provided by the NHC is not only a guide to the expected seasonal activity, it is also a warning it is time to take action.

NCUA urges all federally-insured credit unions, in recognition of National Hurricane Preparedness week and the seasonal outlook provided by the NHC, to perform a review of their disaster preparedness and response plans. These plans should be commensurate with the complexity of operations and focus on minimizing interruptions of service to members and maintaining member confidence in times of an emergency. Previous disasters have provided many "lessons learned" in working through a disaster. Following are the principle "lessons learned":

- Implement pre-disaster actions to ensure a constant state of readiness and take steps to safeguard assets and vital records if an early warning is received;
- Communicate disaster preparedness and response efforts before, during, and after an emergency to keep members, volunteers, employees, and regulators fully aware of the situation;
- Utilize a cross-section of people to develop, test, and implement disaster preparedness and response plans;
- Ensure back-ups are available for not only data but also personnel, worksites, equipment, vendors, and other resources; and
- Treat disaster preparedness and response plans as "living documents" to be updated as circumstance change.

The recent events pertaining to the H1N1 virus (swine flu) highlight the importance of credit union disaster preparedness and response plans including provisions for a Pandemic event. While the recent flu epidemic was mild in the United States, the World Health Organization and Center for Disease Control are cautious about predictions the H1N1 virus will have on the normal flu season this fall and winter.

Pandemic planning, unlike most natural or technical disasters and malicious acts, presents unique challenges to credit unions. The impact of a pandemic is much more difficult to determine. As experience with the recent H1N1 flu, pandemics can be focused to specific regions of the world or the United States, but can spread quickly and cause health officials to close schools and other public gathering facilities or events. Experts believe the most significant challenge may be the severe staffing shortages likely to result from a pandemic outbreak.

Federally-insured credit unions need to review their disaster preparedness and response plans to ensure their pandemic plan is appropriate for their operation. The plan should include:

- A preventative program to reduce the likelihood the operations will be significantly affected by a pandemic event;
- A documented strategy which provides for scaling pandemic events including provisions for a possible second and third wave of a pandemic;
- A comprehensive listing of facilities, systems, or procedures to continue critical operations if a large number of staff are unavailable for prolonged periods;
- A testing program to ensure the pandemic planning practices and capabilities are effective;
- An evaluation of critical service provider plans for operating during a pandemic; and
- An oversight program to ensure ongoing review and updates are made to the pandemic plan.

NCUA provides the enclosed resources to assist you in reviewing your own disaster preparedness and response plans related to hurricane and pandemic preparedness.

If you have any questions or concerns, please contact your NCUA Regional Office or State Supervisory Authority.

Sincerely,
Michael E. Fryzel,
Chairman

Resources

NCUA Resources:

- [Letter to Credit Unions 08-CU-01, Guidance on Pandemic Planning](#)
- [Letter to Credit Unions 06-CU-12, Disaster Preparedness and Response Examination Procedures](#)
- [Letter to Credit Unions 06-CU-11, Interagency Guidance Lessons Learned by Institutions Affected by Hurricane Katrina](#)
- [Letter to Credit Unions 06-CU-06, Influenza Pandemic Preparedness](#)
- [Risk Alert 06-CU-01, Disaster Planning and Response](#)
- [Letter to Credit Unions 01-CU-21, Disaster Recovery and Business Resumption Contingency Plans](#)

Interagency Resources:

- [FFIEC IT Handbook Booklet: Business Continuity Planning on FFIEC web site](#)

REFERENCES

In addition to resources included above, credit unions may find these web sites helpful in their planning activities:

- [Ready.Gov - Business Emergency Planning Guidance](#)
- [The National Strategy for Pandemic Influenza](#)
- [Department of Health and Human Services \(DHHS\)](#)
- [Business Pandemic Influenza Planning Checklist \(DHSS\)](#)
- [Avian Flu Website \(DOD\)](#)
- [Centers for Disease Control \(CDC\)](#)
- [World Health Organization \(WHO\)](#)
- [Department of Agriculture \(USDA\)](#)
- [Department of Labor Occupational Safety and Health Administration \(OSHA\)](#)
- [Department of State](#)

Security Incident Report

[FORM CONFIDENTIAL]

Distributed Denial of Service Attack Response (CU*Answers)

A number of critical products and services provided to Xtend clients require access to public-facing devices on the Internet that are exposed to the threats of a Distributed Denial of Service Attack (DDoS). These devices are hosted and provided by CU*Answers. For the purpose of this recovery plan, Xtend has provided the following:

*“Distributed Denial of Service attacks are just one type of threat faced by organizations that depend on the Internet for business transactions and communications. A description of DDoS attacks can be found in the CU*Answers April 2013 Whitepaper titled “Assessing DDoS Risk”. In response to the heightened awareness surrounding the recent activity from these types of attacks, CU*Answers is providing this overview of the documented DDoS Incident Response Plan.*

PREPARATION

The best defense against such security attacks begins with a layered security strategy starting at each hardened host and expanding to security appliances at and beyond the network perimeter. Key to an effective incident response are the skilled and knowledgeable personnel that make up the Incident Response Team.

*The roles and responsibilities of the Incident Response Team are described in the “CU*Answers Incident Response Policy”.*

COMMUNICATION

*A critical component of any incident response is timely, accurate and consistent communications at all points within the response phase to all internal and external stakeholders including senior management, affected clients and partners, legal counsel, vendors, and agencies including law enforcement (if appropriate). For use with all incidents and disruptions, CU*Answers has deployed the CU*BASE Alerts Notification Site, (accessible to CU*BASE on-line and in-house clients only) for posting current alert status information in conjunction with broadcast alert email notifications. All affected non-client stakeholders will be contacted using methods identified in the “Crisis Communications” section of the “CU*Answers Business Continuity Plan”.*

DETECTION

*Proper detection of potential incidents begins with 24x7 network and host monitoring from multiple presence points within the network. With these monitoring and alerting tools in place, IRT members are notified around the clock of potential incidents that may require prompt response. Personnel are trained and skilled to take immediate measures to identify the type and scope of the incident and to accurately assess the risk to the organization (particularly the security, integrity, and availability of data on the CU*Answers networks).*

MITIGATION

*Once an incident is detected, mobilized IRT members may determine that mitigating steps are required, ranging from the limiting of access to/from specific hosts and networks to the complete protection of assets by prohibiting all traffic to/from specific hosts and networks. The Incident Response Team has been granted the “Authority to Act” as described in the “CU*Answers Incident Response Policy”. Depending on the circumstances of the attack, the Incident Response Team may engage the cooperation of upstream service providers and security vendors if necessary.*

REMIEDIATION AND RECOVERY

Once it has been determined that the incident/attack has elapsed and/or the risk has been reduced, the Incident Response Team will reintroduce services to the network until all have been restored. At the conclusion of the response effort, post-attack procedures include the collection of logs and potential forensic evidence (if applicable) and documenting response and mitigation procedure gaps, weaknesses and lessons learned.”

IT Recovery

Overview of IT Environment

Technology resources used by Xtend staff to provide products and services to clients are leased and managed by CU*Answers. These resources include:

- Workstations and laptops
- Printers and copiers
- Data and Voice networks
- Network and information security
- Email server and applications
- VoIP phones and voice services
- Hosted applications (It's Me 247, CU*BASE/GOLD, MS-Office, etc.)

CU*Answers Network Services has been contracted for support of the above.

They can be contacted at x266 or at helpdesk@cuanswers.com or at x132 during after-hours to reach the support technician on-call.

[NETWORK DIAGRAM CONFIDENTIAL]

Loss of Data Communications

Access to the internal network and to clients is provided by CU*Answers through redundant communications lines. The diagram above shows both primary and secondary gigabit networks connecting the Grand Rapids location to the Kentwood location. Connectivity to the public Internet and to the private client network is available through redundant Internet VPN and MPLS data lines.

CU*Answers maintains redundant data communications at both the Kentwood and Site-Four locations. In the event that data communications are not available through the primary Kentwood location, connectivity is redirected through the secondary Site-Four location.

Loss of Telephone Service

For Call Center operations, Xtend depends on voice communication services provided by CU*Answers through its Interactive Intelligence environment.

The Interaction Client (I3) phone system is provided by servers at the 28th Street datacenter. Voice PRIs are brought into the datacenter on two circuits (one for local and another for long distance). Each circuit has a Cisco voice gateway appliance (redundant).

[NETWORK DIAGRAM CONFIDENTIAL]

All system and network maintenance for the phone system is performed off-hours. In the event of a disruption of service, there is currently no alternate phone system configured. An alert (email/web) should be posted (see "[Crisis Communication](#)" section) to all clients and stakeholders. In the event of a

long-term outage, instructions could be provided to contact one of the analog lines still available or a staff member's cell phone.

The following systems may be affected by an I3 phone system service outage:

- Xtend Call Center, Collections, other campaigns
- Incoming faxes to DID #s
- CU*Talk
- Outgoing calls
- Incoming calls

Probable causes of service outages include:

- Call routing at carrier
- Physical line damage (back-hoe, groundhog, laying sidewalk, etc.)
- VoIP GW hardware/software failure
- CIC server hardware/software failure
- LAN switch-stack failure
- Phone firmware upgrade

Internal I3 phone-system support personnel include:

[CONFIDENTIAL]

Local carrier: [CONFIDENTIAL]

Long Distance and Toll-free: [CONFIDENTIAL]

Xtend procedures to follow during phone outage:

In the event of a phone system outage, Xtend will coordinate with CU*Answers to alert all clients of the incident and expected duration of the outage.

*See "[Crisis Communications](#)" section on posting an alert.

PC/Workstation Build Checklist

Xtend has contracted with CU*Answers Network Services for the support of all PCs and laptops. Below are the instructions for preparing a new or restoring an existing workstation:

To be performed by CU*Answers Network Services personnel:

Recipient Name: Service Tag:

Technician: Date:

Basic Configuration

[PROCEDURES CONFIDENTIAL]

GOLD/ProDOC Installation

[PROCEDURES CONFIDENTIAL]

Business Recovery

A disruption that imposes the relocation of staff and/or critical resources to another area within the facility or to an alternate/temporary facility can be the result of several scenarios such as:

- Loss of service (HVAC, communications, power) is expected to last several days
- Loss of access or physical damage to the structure (fire, water, flying debris, other)
- Large-scale renovation project (planned)
- Hazardous material spill (quarantine)

Recovery steps include:

- Conducting an initial assessment of outage to determine the duration and scope of the event and business functions to resume
- Identifying alternate facilities and arranging for operations
- Notifying employees and providing instructions on where to report and when
- Determining if alternate skilled staff is required for the recovery effort
- Swinging communications to an alternate site (if needed)
- Retrieving records, supplies and resources required to resume operations from off-site
- Determining the impact of the work in process at the time of the disaster
- Determining materials needed (Office and IT equipment)
- Approving and arranging for purchases
- Setting up shipping/receiving operations for the facility (UPS, FedEx, USPS, etc.)
- Ensuring security of assets and safety of staff at each location (physical access, video surveillance, lighted parking lot, etc.)
- Coordinating the repair and restoration of the disaster site

Office workspace recovery options include:

- Relocating to an alternate space/floor within the same building (if damage is contained to small area and access to building granted)
- Working remotely from home, a hotel or a conference room (assuming SSLVPN access is available)
- Leasing equipped work-recovery-area services (dedicated, shared, mobile)
- Working from available space within an alternate CU*Answers' office location (44th street or Muskegon)
- Securing available commercial space from landlord

Office workspace recovery requirements include:

- Workstations (monitor, mouse, keyboard, scanners)
- Power distribution units, lighting
- Desk, table, chair
- Printer, copier, fax, shredder, phone
- LAN, switch, cables
- Paper, envelopes, blank checks
- Extra cell phone chargers
- Whiteboard, markers, easel, flipcharts
- Pens, pencils, staplers, paperclips

In the event of a large-scale relocation effort, Xtend will coordinate with CU*Answers for the recovery and resumption of critical business functions.

Xtend Business Units and Critical Functions

The scale used to categorize business functions is shown below:

- < 4 hours: Clients need and expect us to be able to provide this with minimal downtime. Very important.
- < 8 hours: Clients can operate but would feel the impact if downtime exceeds 8 hours. Still important.
- < 24 hours: Clients can operate and close the day but expect us to be back by the next day. Somewhat important.
- 48-72 hours: Clients are inconvenienced but not significantly impacted. Not as important.
- 72+ hours: Clients benefit from this but are not impacted during downtime. Non-essential.

Xtend SRS Bookkeeping (minimum staff 2) Business Unit Lead: Danielle O'Connor

Critical Functions	Recovery Time Objectives
Bill Pay	< 4 hours
EOM Processing	< 8 hours
Work Daily Exceptions	< 4 hours
Daily Balancing	< 8 hours
Daily Posting	< 8 hours

Xtend Business Development (minimum staff 1) Business Unit Lead: Liz Winninger

Critical Functions	Recovery Time Objectives
HTML eStatement Notifications	< 8 hours
Lockbox Processing	< 24 hours
E-info (Managed content library and delivery services)	48-72 hours
eNewsletter Service	48-72 hours
Member Reach	< 24 hours
Online Banking Community Stories (Manage content library and delivery services)	48-72 hours
RevGen-HylerDrive 2.0	< 24 hours

Xtend Call Center (minimum staff 4) Business Unit Lead: Matt VandeWater

Critical Functions	Recovery Time Objectives
Provide Phone Support for Credit Union Members	< 24 hours
Web Chat	< 24 hours
Handle Inbound/Outbound Call Campaigns	< 24 hours

Crisis Communications

In a crisis situation, communication can make or break a complex recovery effort. It is important that internal stakeholders are informed of the situation and know what is expected of them (where to report and when) and that external stakeholders are made aware of the (potential) disruption to business functions and services.

Crisis communications must begin early in the recovery process beginning with notification of recovery teams, and continue through the event until business has returned to normal.

Communications to external stakeholders during a crisis situation is best performed by a trained and/or experienced media spokesperson.

With effective crisis communications:

- Employees feel reassured
- Stakeholders feel confident in the response
- Media reports are accurate

Communications in a crisis is all about who, what, when and how.

- Who?
 - Staff (and their families), board of directors, members, vendors, service providers, emergency personnel, media, local/state/federal agencies, etc.
- What?
 - A carefully constructed message that generates confidence and assurance
- When?
 - Timing and frequency of the message throughout the disruption
- How?
 - Which communications channel to use for each group (email, phone, fax, web, etc.)

Key Stakeholders

Circumstances with each crisis scenario will determine who needs to be contacted and when. Stakeholders can be categorized as internal and external, each requiring unique message content.

Key stakeholders include:

- Internal audiences such as
 - Employees, and family members
 - Corporate management
- External audiences such as
 - Credit union members
 - Vendors
 - Partners
 - Regulators
 - Media including
 - Print
 - TV
 - Radio
 - Web

To internal stakeholders consider stating:

- Facts about the situation
- The response initiated by management
- Ways employees can report to their managers
- Employee assistance programs offered

- How the event might affect operations over subsequent days

To external stakeholders consider stating:

- Facts about the situation
- What Xtend is doing to resolve the incident and what each stakeholder can expect as a result of the incident (how it may affect them)
- Expected duration of the event
- Open issues that management continues to investigate

Communicating in a Crisis

All questions from the news media or others regarding the Plan or any disaster should be directed to the Incident Manager or CEO.

Methods of communication include:

- Email (corporate or personal)
- Instant messaging or phone texting
- Xtend corporate web site
- Social media tools such as Facebook, Twitter, LinkedIn, Skype, WebEx, etc.
- Phone (voice)
- Press conference
- Press release (print)
- Fax

Creating holding statements, which are pre-written statements for use in a variety of crises such as natural disaster, fire, explosion, public health emergency, and workplace violence incident, helps ensure that all relevant information is provided quickly and accurately.

Holding statements should identify the primary audience, the optimal delivery time, suggested method of delivery, as well as who should/should not deliver the message. Also, expect and be prepared for follow-up questions.

Key points to remember during and after the incident

- Remind employees that only media-trained personnel should speak to the media.
- Weigh the desire for information against the need to issue a statement.
- You will not know everything immediately.
- Give them what they need to know in the most appropriate method possible.
- Update the status often, even if there is no material development. This helps those connected feel they are in the loop on key details.
- Keep the information fresh and frequent (minimize waiting time between comments).
- Realize that the media is one of your best resources.

Publishing Alerts

Rev. October 1, 2013

This document outlines the basic steps for requesting an Alert to be published on the client Alerts website.

Procedure for Requesting a CU*BASE Alert



DO NOT JUST SEND AN EMAIL!!!! You must actually speak to the person on the phone or in person. By the time an email is read, it may be too late to publish an alert!

CALL OR VISIT the first person on the publish list below. If they are unavailable, contact the second person, then the third person, and so on. Do NOT contact all of them at the same time or multiple alerts might be published.

Procedure for Requesting an Xtend Shared Branch Alert

If the alert is urgent, use the same procedure as for a CU*BASE alert, but in general these are not urgent. Send an email to the first person in the publisher list.

Who Can Publish

The following people have the ability to create alerts, and are listed in the order in which they should be contacted when an alert is needed.

CU*Answers Publishers

[LIST CONFIDENTIAL]

Notice there aren't email addresses listed here? That's because you're supposed to CALL or VISIT them!

Others to contact if needed (also see "need help writing content?" on the next page):

[LIST CONFIDENTIAL]

**People who can help with WordPress software issues*

Special Note about After-Hours (Operations) Alerts

If alerts are needed early in the morning or after normal working hours, then the three names in Operations move up to 1st and 2nd position on the list.

Instructions for Publishers

Rules for Publishing Alerts

Alerts are designed for quick communications about urgent matters, particularly ones that won't live for a long time. Things like It's Me 247 or CU*TALK being down, a data integrity issue found in the software, errors we are working on right now or anything with a relatively quick ETA.

If the problem will likely be resolved more quickly than it will take to create the alert (send it out, clients receive their emails and read them, etc.), an Alert may not even be created. That should be a judgment call on the part of the publisher and the programmers or other parties involved.

Need help writing the content of an alert? Contact someone on this list for help:

[LIST CONFIDENTIAL]

Sometimes an actual email would be better:

- If the communication isn't urgent
- If the information will need to be referred to again (such as a schedule of upcoming HA rollovers)
- If the communication is "official" and would maybe need to be communicated to a Board or printed and put into a file (such as a security breach)

In cases like this you can still publish an alert, but also do a normal announcement that can be emailed and posted on the News or other page of the website for later reference.

Library of Common Alerts

Go to the Portal > CU*Answers > Responding to Emergencies and look just below the publisher list for a list of common alerts. Just copy and paste this content into your alert, adjusting it as needed for the particular situation.

Tips for using the Alert Software

The Alerts site is available to all CU*BASE clients via the option on the Net drop-down menu in CU*BASE GOLD.

For those authorized to publish, here are some tips:

[LIST CONFIDENTIAL]

Sending the Alert Email

After an alert is published, an email must be sent manually to the broadcast email list (email groups are in an Outlook public folder). The only difference between these is the ATTENTION line and the URL, so you can combine them or change them up as needed. **Remember that self-processors sometimes get alerts that online CUs don't and vice versa!** Regarding the Xtend email, you will only send one email, not two, to all online and self-processors (one email because the link is the same - to the Xtend Alerts page).

Refer to the separate "Announcing Something to Clients" document for hints on setting up your Outlook and addressing the email itself to all clients.

→For text you can copy, look below the pictures.

Sample Email to Online Clients

[IMAGE CONFIDENTIAL]

Sample Email to Self-Processors

[IMAGE CONFIDENTIAL]

Choosing the Email Addresses when Sending the Alert Email

1. Click BCC (might have to display this field, if you don't already see it - look under the Options tab on the ribbon)
2. In the Address Book drop-down, choose "Client Online" or "Client Self Processor"
 - a. *TIP: See below for instructions on if you don't see this in the list*
3. Click on the first CU name in the list
4. Hold the **Shift** key and tap the **End** key
5. Press Enter or click the BCC button at the bottom of the list

Text you can copy to an email:

Subject Line = CU*BASE Alert: xxxxxx

ATTENTION ONLINE AND SELF PROCESSING CREDIT UNIONS

An alert has just been posted on the **CU*BASE Alerts!** page. To read it, click the Net button on any CU*BASE GOLD screen and choose the Alerts link. (http://alerts.cubase.org/alerts_for/cuanswers-online/)

CU*Answers | Refer inquiries to: csr@cuanswers.com

The information contained in this message or any attached document is confidential and intended only for individuals to whom it is addressed. If you received this message in error, please inform me immediately. Then delete the email message and any attachments. Any unauthorized use, distribution, or copying of this information is prohibited.

Subject Line = CU*BASE Alert: xxxxxx

ATTENTION ONLINE AND SELF PROCESSING CREDIT UNIONS

An alert has just been posted on the **CU*BASE Alerts!** page. To read it, click the Net button on any CU*BASE GOLD screen and choose the Alerts link. (http://alerts.cubase.org/alerts_for/self-processor/)

CU*Answers | Refer inquiries to: csr@cuanswers.com

The information contained in this message or any attached document is confidential and intended only for individuals to whom it is addressed. If you received this message in error, please inform me immediately. Then delete the email message and any attachments. Any unauthorized use, distribution, or copying of this information is prohibited.

Add Email Group to Outlook Address Book

In order to choose client names for the broadcast emails, you must first add both the online and self-processor list to your dropdown in Outlook so it shows up here:

Rules for Xtend Shared Branch Alerts

Procedure for Requesting an Xtend Shared Branch Alert

If the alert is urgent, use the same procedure as for a CU*BASE Alert, but in general these are not urgent. Send an email to the first person in the publisher list.

Here's what we tell clients to do on the site →

How to Request a Xtend Alert

Reporting Internet Fraud

The following website is one to check out for filing a complaint of Internet crime, such as phishing and other fraudulent activity experienced by your members: <http://www.ic3.gov/default.aspx>

Communicate fraud alerts to your peers!

This space is a service of Xtend, Inc. If you have information about fraud attempts (bad checks, lottery scams, etc.) send all pertinent information in an email to csr@cuanswers.com and we will make sure the alert is published. We will generally just copy the information from your email so please be as clear as possible. We reserve the right to remove personal references that might cause privacy concerns. Also make sure to include a contact name and phone number at your credit union.

Xtend alerts are specifically in-network alerts that network participants are telling each other about something they personally know about regarding specific fraud attempts, bad checks being passed, etc. These types of alerts are not "I got this in my email, please pass it on" chain-mail communication. If a credit union has an article that they would like to pass along, they can contact Xtend Member Reach, who will call them with pricing, timing, etc. for the article they'd like to pass along. Additionally, you could ask Web Services if they would publish a story/article on cusecure.org as they are always looking for material for this security-gearred website.

Since Xtend alerts typically come directly from clients, they usually need some wordsmithing. Keep in mind things like member privacy - just because a CU says a member is a bad guy, doesn't mean he really is (someone might even be using someone else's name). So, keep the amount of private info to a bare minimum and/or use verbiage like "a person claiming to be John Doe." Also, avoid any editorial comments like "we've had lots of trouble with this guy" or "yay, we caught him!" Just the facts, ma'am, just the facts.

Include a "Reported by" line with the credit union name and a "Contact" line with the person's name who reported it to us, as in this sample.

Jun 8, 2006 - 3:43 PM

More Counterfeit Checks

Reported by: NuUnion CU, Michigan

Contact: Becky Stolarz

The credit union received 3 counterfeit IHOP checks that were returned. All 3 checks were for \$926.50 and made payable to the same member. This same member also cashed a counterfeit Quizno's check for \$726.50. All four checks have the same account number 7394706401 and routing number 072400052.

Regarding publishing the Xtend alert, the only difference is that you check the Xtend box and not the Online and Self-Processors boxes in WordPress.

Text you can copy to an email:

Subject Line = Fraud Alert: xxxxxx

ATTENTION ONLINE AND SELF-PROCESSING CREDIT UNIONS

A fraud alert has just been posted on the CU*BASE Alerts page. To read it, click the Network Links button on any CU*BASE GOLD screen and choose the Alerts link. (http://alerts.cuanswers.com/alerts_for/Xtend/)



PLEASE DO NOT REPLY TO THIS MESSAGE | Refer inquiries to: info@xtendcu.com

The information contained in this message or any attached document is confidential and intended only for individuals to whom it is addressed. If you received this message in error, please inform me immediately. Then delete the email message and any attachments. Any unauthorized use, distribution, or copying of this information is prohibited.

Appendix

Xtend Staff Emergency Contact Information

(as of 8/22/2018)

Last Name	First Name	Ext.	Job Title	Alt. Phone	Cell Phone

[CONTACT INFORMATION CONFIDENTIAL]

Board of Directors

Board Member	Credit Union	Phone Number	Email Address

[CONTACT INFORMATION CONFIDENTIAL]

Vendors and Service Providers

In addition to vendors listed in the CU*Answers Business Continuity Plan

Vendor Name	Description	Phone Number	Email Address

[CONTACT INFORMATION CONFIDENTIAL]

