

Annex H - Pandemic Influenza Continuity of Operations Plan

I. INTRODUCTION

II. PURPOSE

This annex provides guidance to the Keweenaw Bay Indian Community and serves as the plan for maintaining essential functions and services during an influenza pandemic. This annex neither replaces nor supersedes any current, approved Tribal continuity plan; rather it supplements it, bridging the gap between the traditional, all-hazards continuity planning and the specialized continuity planning required for a pandemic by addressing additional considerations, challenges, and elements specific to the dynamic nature of a pandemic. This guidance/annex stresses that essential functions can be maintained during a pandemic outbreak through mitigation strategies, such as social distancing, increased hygiene, the vaccination of employees and their families, and similar approaches. Influenza may not, in itself, require a traditional continuity response, such as partial or full relocation of the organization's essential functions, although this response may be concurrently necessary due to other circumstances.

III. CONCEPT OF OPERATIONS

The Keweenaw Bay Indian Community will monitor the severity of the pandemic and establish continuity activation triggers to address the unique nature of the pandemic threat. The Pandemic Influenza Continuity Plan will be implemented as needed to support the continued performance of essential functions. This plan is to be read in conjunction with the Tribe's Governmental Continuity of Operations (GCOOP) Plan, as appropriate. It supplements the GCOOP plan by addressing considerations and elements specific to pandemic events and emerging infectious diseases. This plan does not supersede Policy 7.2 part D of the Tribal Employee Handbook, but serves as a complement. The plan may be modified to conform to any guidance published by the CDC or Tribal, local, and state health departments.

IV. CONTINUITY PLANNING

All government personnel are to be informed regarding protective actions and/or modifications related to this plan. Messaging and risk communications during an emerging infectious disease or pandemic will be conducted by the Health Administrator and Emergency Manager in coordination with the Tribal President. Guidance and instructions on established infection control measures such as social distancing, personnel protective equipment and telework policies are provided by the Chief Executive Officer, to assist in limiting the spread of influenza at the primary and alternate worksites. Within the workplace, social distancing measures could take the form of: modifying the frequency and type of face-to-face employee encounters (e.g., placing moratoriums on hand-shaking, substituting teleconferences for face-to-face meetings, staggering breaks, posting infection control guidelines); establishing flexible work hours or worksite, (e.g., telecommuting);

promoting social distancing between employees and customers to maintain three-foot spatial separation between individuals; and implementing strategies that request and enable employees with influenza to stay home at the first sign of symptoms. Department heads are encouraged to communicate with their employees, particularly any who are in harm's way. The messages should follow the Tribal President's message, should echo that message's themes, and should be in the same voice employees' associate with their leader. Frequent, daily contact is important to keep employees informed about developments in the organization's response, impacts on the workforce, and to reassure employees that the organizations continuing to function as usual. Tribal leadership and the Emergency Planning Committee should include deliberate methods to measure, monitor, and adjust actions to changing conditions and improved protection strategies.

- Implement a formal worker and workplace protection strategy with metrics for assessing worker conformance and workplace cleanliness.
- Monitor and periodically test protection methods.
- Track and implement changes in approved or recommended protection measures.
- Pre-position material and equipment onsite.
- Ensure essential personnel are at the primary worksite.
- Reaffirm that essential suppliers have their material and personnel on-hand and are able to respond and support as planned.
- Coordinate with local public health and emergency response points of contact to ensure open, adequate communications.
- Departments will conduct assessments of their Essential and Non-Essential Functions and include that in their departmental continuity of operations plan. This will determine what employees are deemed necessary to the effort to provide essential tribal services.

Department-specific risk assessments that identify actual control measures for all personnel and/ or positions will be conducted initially and periodically thereafter for each department by the CEO's office in coordination with a department point of contact. These assessments are kept as part of each component's specific action plan documentation.

Department heads are encouraged to add their specific plan and procedures on their selected mitigation, prevention, protection, or control measures, to include those necessary during a pandemic.

V. Operational Phases and Implementation

Phase	Management Action Point
I – Readiness and Preparedness	Declaration of a National, State, Tribal or Local Emergency. LEPC implements weekly meetings/calls to assess the situation
II – Activation and Relocation: Plans, procedures, and schedules to implement exposure limiting protocols, department	Confirmed cases within the Upper Peninsula or within a radius of 180 miles of a tribal community for a novel contagion; For

<p>specific mitigation plans are activated</p>	<p>common flu and other known illness, an infection rate of 51% of any building can be used to trigger. The LEPC shall meet or conference calls for daily situation updates and make recommendations to the Tribal Council as deemed necessary. Partial EOC activation may be implemented.</p>
<p>III – Continuity Operations: Full continuity implementation, only those employees necessary to accomplish essential tribal functions report to work. Other employees may be re-assigned to assist other departments in maintaining essential functions.</p>	<p>A confirmed case of a novel contagion within Baraga, Houghton, or Marquette counties. For common or known illness, a 51% absentee level of total tribal employees may be used as a trigger. Full EOC activation shall be implemented.</p>
<p>IV – Reconstitution: Return to normal operations and</p>	<p>Upon termination of a declared emergency or for known illnesses, when the absentee level falls below 50%.</p>