



FloridaFIRST 

A Coalition of Financial Institutions for Business Continuity

FloridaFIRST Tampa Bay Resilience Exercise

After Action Report

Exercise Sponsors

The U.S. Department of the Treasury and FloridaFIRST sponsored this exercise for the financial sector in the Tampa Bay region.

- ▶ United States Department of the Treasury, Office of Critical Infrastructure Protection and Compliance Policy
 - Coordinates the Department's development and implementation of policies regarding the protection of the critical infrastructure of the financial services sector.
 - Serves as the Sector Specific Agency for banking and finance, coordinating the public-private sector efforts to improve the security and resilience of the financial sector.

- ▶ FloridaFIRST
 - Launched in October 2005, FloridaFIRST was created with a goal of enhancing the resilience of Florida's financial services sector.
 - The organization was created with the supervision of the Florida Banker's Association. Founding partners that BAC Florida, Northern Trust Bank of Florida, City National Bank of Florida, and Mellon United National Bank.
 - Other alliance partners include the Department of Homeland Security, and the Federal Reserve Bank of Atlanta.
 - The FloridaFIRST mission aims at building a coalition of banking and financial sector institutions with a focus on contingency planning, emergency management, and business continuity, and an emphasis on developing and strengthening relationships with public and private sector partners.

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Introduction

With the goal of increasing the resilience of Florida's financial services sector, financial institutions in South Florida formed FloridaFIRST in October 2005. As the regional coalition for the State of Florida's financial services sector, FloridaFIRST looks to develop and strengthen all relationships across the public and private sectors with an eye towards contingency planning, emergency management, and business continuity planning.

Building on the success of the State-wide FloridaFIRST organization, the financial community organized the Tampa Bay regional chapter. On July 12, 2007, FloridaFIRST Tampa Bay held its first resilience exercise. The exercise brought together over 80 participants from Florida financial institutions, as well as senior representatives from Federal, State, and local governments.

The objectives of the exercise were to:

- ▶ Identify Tampa Bay area needs related to the interaction of government and financial services sectors in potential crises;
- ▶ Test assumptions regarding the use of public and private resources; and
- ▶ Create information-sharing strategies to enhance preparedness and response.

Exercise participants considered challenges that might arise during a terrorist attack, including damaged infrastructure, uncertain or conflicting information, prolonged limited access to the downtown area, decontamination needs, perimeter enforcement, communications protocols, public relations demands, high employee absenteeism, and the execution of continuity of operations (COOP) plans. These challenges tested the effectiveness and vitality of business continuity plans, including the mechanisms and procedures for information and resource sharing between public and private sectors.

Document Purpose & Description

The purpose of this report is to summarize the exercise itself, describe the incident response and recovery issues highlighted by the exercise, and to suggest next steps to address these issues. The appendices to this report provide detailed information about the exercise structure, participants,

scenario, team actions, and team conclusions.

This report is not intended to assign tasks to specific organizations, but rather to recommend actions that could be taken to improve current resilience planning efforts.

Exercise Summary

STRUCTURE

Exercise participants were organized into five teams and instructed to respond to simulated crises based on their real-world roles, responsibilities, and plans.

Two teams represented the financial services sector: one team represented depository institutions, while the other represented non-depository institutions.

- ▶ For exercise purposes, a depository institution was defined as a financial institution operating under legal charter to accept monetary deposits from customers and/or businesses.
- ▶ For exercise purposes, a non-depository institution was defined as a financial institution that funds its operations through the sale of insurance, securities, other products, or by performing essential functions for the financial services sector.

Two teams represented the government and emergency management response systems: one team represented local government and emergency management response, while the other represented State government and emergency management response.

The control team played the role of key entities that were not represented on

the four stakeholder teams, including the Treasury Department, the Department of Homeland Security (DHS), other Federal agencies, the media, and the public.

For further information about the exercise structure and participants, see Appendices A and B.

SCENARIO

The exercise focused on emergency management and response, and tested business resilience planning through simulated radiological attacks across the nation, including a significant attack in downtown Tampa.

The exercise progressed over two moves:

In the first move, the teams faced initial attacks in New York City and Chicago, followed by an attack in Tampa itself. The teams had to respond to the escalating situation, which included a radiological plume, a closed-off downtown area, and increasing public fear.

In the second move, the teams focused on possible recovery steps that the financial services sector and government participants would need to take as the Tampa Bay region attempted to return to normalcy after the attacks.

A discussion on insights and next steps followed the moves.

For a detailed summary of scenario elements, see Appendix C.

PARTICIPANT ACTIONS

Because teams were composed of a combination of the financial services sector and key local, State, and Federal representatives with different roles, responsibilities and experiences, the actions taken and decisions made by each team brought great value to the plenary session briefings and to the event overall.

The exercise encouraged the development of innovative approaches to improve current resilience and continuity planning, procedures, and programs within the financial institutions and between the public and private sectors.

For a detailed description of actions discussed or taken by the participant teams in response to scenario developments, see Appendix D.

Incident Response and Recovery & Lessons Learned

The most important time for contingency planning is before a terrorist attack or other crisis occurs. Planning is particularly important for the financial services sector, as it plays a crucial role in maintaining stability locally and nationally, while ensuring economic and social viability. Thus, cooperation across the public and private sectors becomes a critical part of the contingency planning process.

Entities across the financial services sector have made progress on contingency plans and procedures to encourage order in the marketplace during a crisis. FloridaFIRST Tampa Bay seeks to build upon existing planning efforts to foster cross sector collaboration and integration among critical members of the financial services community.

Six critical issues emerged from the FloridaFIRST resilience exercise. This section will describe each issue and include participant-generated recommendations. The six major issues were:

- ▶ There is a need for cross-sector communication between key public and private sector leaders to promote timely and accurate dissemination of critical information.
- ▶ There is a need to educate and train the general public and all financial services sector employees on key disaster preparedness and response terminology prior to a crisis.
- ▶ During a crisis, communication with critical financial services personnel and the public at large must be clear, coordinated, and consistent.
- ▶ There is a need for the creation of a centralized entity to filter requests and facilitate the smooth flow of critical information during a crisis.
- ▶ Improvements are needed in private sector training and COOP planning. These plans need to be coordinated with the public sector and other private sector entities.
- ▶ During a crisis, institutions may decide to request that financial regulators provide temporary relief from certain guidelines, regulations and/or procedures should concerns arise about financial sector stability.

INCIDENT RESPONSE AND RECOVERY ISSUE A

There is a need for cross-sector communication between key public and private sector leaders to promote timely and accurate dissemination of critical information.

The National Response Plan¹, currently under review, continues to stress the importance of interagency communication, coordination, and effective public messaging in times of crisis. Information exchange is a continual process, and during a crisis, the orderly exchange of information between critical parties can speed response and recovery.

Lessons Learned:

- ▶ Effective performance during a crisis relies heavily on established relationships. The exercise demonstrated the importance of building key partnerships and determining contacts *prior* to the occurrence of a crisis.
- ▶ The private institutions sought a single source for accurate and timely assessments and updates.
- ▶ Financial services entities looked to local and State responders for situational updates. The private sector relies on these updates

when making operational decisions.

FloridaFIRST Possible Actions:

- ▶ FloridaFIRST can work directly with private financial institutions to help facilitate an understanding of key points of contact during a crisis.
- ▶ Utilize the FloridaFIRST seat on the Hillsborough County Joint Information Center (JIC) to facilitate its role as a primary financial services sector point of contact, not only during a time of crisis, but during the planning that occurs as part of the maintenance of crisis management protocols.
- ▶ Work to promote private sector understanding of the role FloridaFIRST plays not only on the JIC, but as a general point of contact for information sharing as well.

¹ This document is available at <http://www.dhs.gov/xlibrary/assets/NRPbaseplan.pdf>.

INCIDENT RESPONSE AND RECOVERY ISSUE B

There is a need to educate and train financial services sector employees on key disaster preparedness and response terminology prior to a crisis.

The critical response period immediately following a crisis requires clear coordination and decisive actions to formulate proper responses. However, success during any period of incident response depends in part on the reactions of the general public, and in the case of the financial services sector, key employees, and the training that these critical personnel receive prior to the event. The calm and orderly behavior of citizens, prompt adherence to public messaging guidance, and correct preventative measures often dictate how order is maintained during the crisis and the speed by which a community can recover.

Lessons Learned:

- ▶ The exercise demonstrated a gap between the local financial services sector and the first responders with regard to key terminology used during a crisis. Emergency management terms including, "shelter in place," "lockdown," and "self-decontamination," created confusion among the FloridaFIRST Tampa Bay members because of a lack of understanding about the meaning of the terms. The

exercise demonstrated that this gap can actually breed greater confusion, hindering an effective response. The gap extended to private financial institutions. Employee actions may be greatly affected by confusion over such terminology, as well as confusion over their roles/functions during a crisis, decreasing sector-wide efficiency for financial services entities.

FloridaFIRST Possible Actions:

- ▶ As a key intermediary, FloridaFIRST might consider working with private financial institutions and public organizations to ensure critical terminology used by public officials and first responders is understood and properly disseminated to its members.

INCIDENT RESPONSE AND RECOVERY ISSUE C

During a crisis, communication with critical financial services personnel and the public at large needs to be clear, coordinated, and consistent.

The demand for information during a crisis will be persistent. Media coverage of the unfolding event will heighten the demand for continual updates and may also exacerbate the situation through speculation or inaccurate reporting of information.

Lessons Learned:

- ▶ As exercise participants highlighted, information operations will be a centralized function, managed through the JIC. However, this does not account for any messages (operational updates, work schedules, infrastructure status reports, etc.) that may or may not be issued through key entities, including those in the financial services sector.
 - The exercise demonstrated a desire by the financial services sector to issue statements/situational updates to key personnel, as well as their customer base.
- ▶ Some information that could be released to the public may not be beneficial for maintaining

order during a crisis. Exercise participants on the government/first responder teams calculated the risk of releasing information on the symptoms of radiological poisoning to the public at large.

- ▶ Any messages released through the JIC need to be consistent. More importantly, efforts need to be made to limit the dissemination of messages by other individuals.

INCIDENT RESPONSE AND RECOVERY ISSUE D

There is a need for the creation of a centralized entity to filter requests and to facilitate the smooth flow of critical information during a crisis.

The importance of a centralized system, focused on the financial services sector, to filter information and channel important messages to the correct outlets is imperative during a crisis. This centralized entity would serve as the key coordinator and main resource for all contributing parties during an incident response. The National Infrastructure Protection Plan² identified a need for the banking and finance sector to encourage cooperation and partnerships among key entities to ensure proper response.

Lessons Learned:

- ▶ Participants expressed an acute desire for a centralized outlet to turn to during a crisis to ensure timely and accurate receipt and dissemination of all critical messages.
- ▶ There was a demonstrated lack of central organizing force within the Florida financial services community to serve as a general clearing house for all public/private sector financial information that may be passed to key public entities.

FloridaFIRST Possible Actions:

- ▶ As a key intermediary between the public and private financial services sectors, FloridaFIRST may serve as a needed facilitator and critical asset in the collection and dissemination of information, both prior to and during a crisis.
- ▶ FloridaFIRST may consider the option of using the Internet as a tool to gather and disseminate key information, as well as a means to distribute messages within the financial services community and to key external participants as other regional entities have done.
- ▶ To promote active and proper involvement, FloridaFIRST should explore the possibility and effectiveness of gaining a seat on all regional Emergency Operations Centers (EOCs), much like the seat FloridaFIRST currently has at the Hillsborough County JIC.

² The document is available at http://www.dhs.gov/xlibrary/assets/NIPP_Plan.pdf.

INCIDENT RESPONSE AND RECOVERY ISSUE E

FloridaFIRST Possible Actions:

Improvements are needed in private sector training and COOP planning. These plans need to be coordinated with the public sector and private sector entities.

From natural disasters to acts of terrorism, the ability of business and government to adapt to fast-changing and often dangerous circumstances is critical to the function of key services. In particular, COOP planning stands as one of the key tools to aiding a successful response.

- ▶ Through its ability to leverage lessons learned across other regional partnerships and its strategic partners, FloridaFIRST may serve as a key intermediary to advise and enhance existing COOP plans, and to encourage robust planning across both public and private sectors.

Lessons Learned:

- ▶ Many key functions, especially in the financial services sector, remain in the hands of private entities, underscoring the importance of private sector COOP planning.
- ▶ Private sector COOP planning at this stage remains a largely internal and rarely shared process. The exercise demonstrated a lack of consistency and understanding in COOP planning across various private entities.
- ▶ The exercise highlighted a lack of knowledge regarding many parts of the financial services COOP efforts.

INCIDENT RESPONSE AND RECOVERY ISSUE F

During a crisis, institutions may decide to request that financial regulators provide temporary relief from certain guidelines, regulations and/or procedures should concerns arise about financial sector stability.

posed during a crisis and financial institutions should incorporate alternative compliance mechanisms into their plans.

A crisis like the simulated attack in this exercise may force businesses to operate under different circumstances. In certain circumstances regulators have the authority under their emergency powers to provide limited temporary relief. Examples of previous relief during crises and the conditions under which this relief was provided may provide insights into the types of conditions that will prompt consideration of any such potential relief.

Lessons Learned:

- ▶ Financial institutions may choose to consider consulting with their regulators about the types of regulatory relief that is within the authority of those regulators, and may choose to review previous situations of when this relief was granted.

FloridaFIRST Possible Actions:

- ▶ Financial institutions should be aware of legal authority for any potential regulatory relief, and should engage in transparent discussions with those regulators regarding challenges

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Appendices

APPENDIX A:

EXERCISE ORGANIZATION & STRUCTURE

Exercise participants were organized into five teams – two financial services teams, two government and emergency management teams, and a control team.

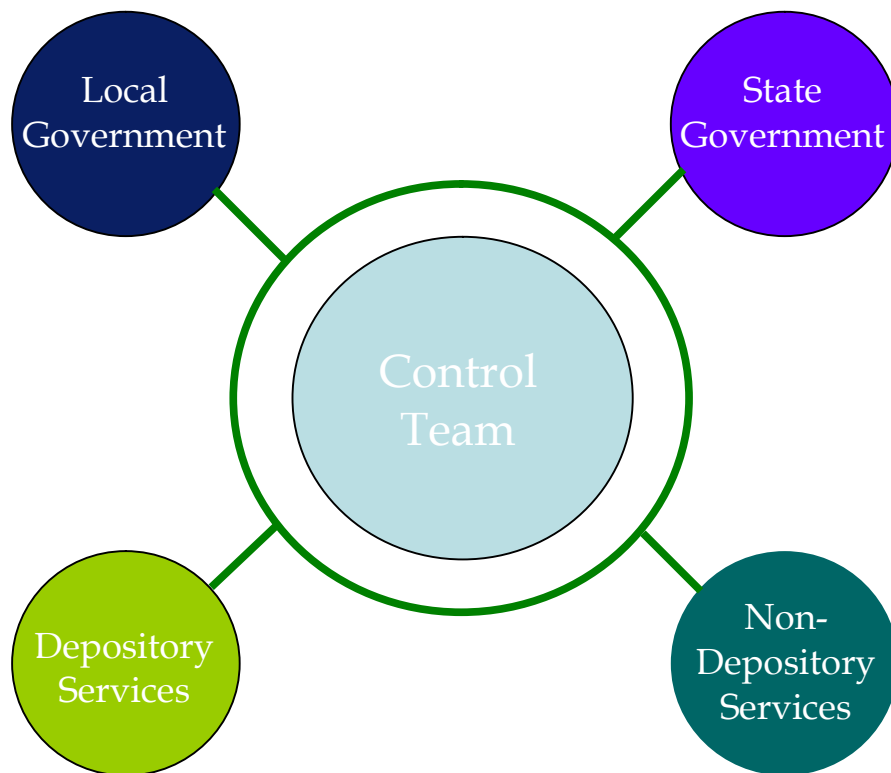
The financial services teams were divided. One team represented depository services entities, and another represented non-depository services entities.

- ▶ For the purposes of this exercise, a depository institution was defined as a financial institution operating under legal charter to accept monetary deposits from individual customers and/or businesses.
- ▶ For the purposes of this exercise, a non-depository institution was defined as a financial institution that funds its operations through the sale of insurance, securities, other products, or by performing essential functions for the financial services sector.

The government and emergency management teams were also divided in two teams. The first team represented state emergency management and government, and the second team represented local government and emergency management.

The control team, which included representatives from the Federal government and the exercise design team, orchestrated exercise injects and played the roles of other key entities not directly represented on the four stakeholders' teams, such as the media, the general public, and key Federal agencies (e.g., the Treasury Department, DHS).

Figure 1: Simulation Teams and Team Structure



During the exercise, teams were required to respond to simulated circumstances and incidents based on their “real-world” roles, responsibilities, and plans.

Teams were structured with a mix of organizations in order to provide varying viewpoints and response strategies. Prior to the start of the exercise, a team leader was identified to speak for their team and present each briefing during the plenary sessions. The teams were assisted by facilitators who kept team discussions on track, and ensured that briefings and other deliverables were prepared in a timely manner. A rapporteur served as the central point of contact

for incoming and outgoing messages, recorded key points, and assisted in the preparation of plenary session briefings.

At the end of each move, a plenary session was held to allow representatives from each team to brief the entire group on their team’s major decisions and actions. During plenary sessions for moves one and two, teams discussed each others’ key concerns, critical actions taken, information exchange, roles and responsibilities, and critical messages and communication tools. At the end of the exercise, teams addressed insights gained, critical next steps, and FloridaFIRST’s possible future roles.

APPENDIX B:

EXERCISE PARTICIPANTS

The FloridaFIRST Tampa Bay resilience exercise brought together senior officials from Florida’s financial services sector, other critical infrastructure sectors, and from Federal, State, and local government.

PRIVATE SECTOR ORGANIZATIONS
▶ BAC Florida Bank
▶ Bank of Tampa
▶ BankUnited
▶ Bay Cities Bank
▶ BB&T
▶ Citigroup
▶ City National Bank of Florida
▶ Coast Bank of Florida
▶ Depository Trust and Clearing Corporation
▶ First Community Bank of America
▶ Florida Bankers Association
▶ Intercredit Bank NA
▶ JP Morgan Chase
▶ MacDill Federal Credit Union
▶ Northern Trust
▶ Orion Bank
▶ Pilot Bank
▶ Platinum Bank
▶ Raymond James Bank
▶ Synovus Bank of Tampa
▶ Union Credit Bank
▶ USF Federal Credit Union
▶ Valrico State Bank
▶ Washington Mutual Bank
▶ Whitney National Bank

PUBLIC SECTOR ORGANIZATIONS
▶ Bureau of Alcohol Tobacco and Firearms
▶ Clearwater Emergency Management
▶ Clearwater Police Department
▶ Department of Homeland Security
▶ Federal Bureau of Investigation
▶ Federal Deposit Insurance Corporation
▶ Federal Reserve Bank of Atlanta
▶ Florida Department of Law Enforcement
▶ Hillsborough County Fire and Rescue
▶ Hillsborough County Health Department
▶ Hillsborough County Office of Emergency Management
▶ Hillsborough County Sheriffs Office
▶ Manatee County Emergency Management
▶ Manatee County Public Safety
▶ Miami Dade Police Department
▶ National Credit Union Administration
▶ Office of Thrift Supervision
▶ Pasco County Emergency Management
▶ Pasco County Sheriffs Office
▶ Pinellas County EMS & Fire Administration
▶ Pinellas County Office of Emergency Management
▶ Polk County Fire and Rescue
▶ Polk County Office of Emergency Management
▶ Securities Exchange Commission
▶ State of Florida, Office of Financial Regulation
▶ St. Petersburg Police Department
▶ Tampa Fire and Rescue Office of Emergency Management
▶ Tampa Police Department
▶ United States Department of the Treasury
▶ United States Secret Service

APPENDIX C:

EXERCISE SCENARIO

The exercise scenario consisted of two moves, followed by an insights and next steps discussion. The first move described a series of terrorist attacks on financial institutions in New York City, Chicago, and Tampa, and placed participants in a scenario forcing them to respond to a devastating attack in downtown Tampa involving a radiological device. The second move progressed forward one week, and tasked participants to begin thinking about recovery issues. The final segment of the exercise focused on lessons learned and key insights, letting participants step away from the simulation itself and focus broadly on both the issues they saw as most important and on their vision of how FloridaFIRST as an organization might assist in tackling those key issues.

Move One: Terrorist Attacks on U.S. Financial Institutions

The first move commenced on July 12, 2007, when participants were informed that a series of three separate terrorist explosions had occurred in New York City, Chicago, and Tampa. The following background information was given regarding events that led up to the attacks.

- ▶ DHS released information that terrorists might be targeting sites across the financial services sector in New York City and Chicago the week before

July 12, 2007. At the time, DHS raised the threat level for the financial services sector to "High."

- ▶ A series of three explosions, in succession, struck New York City, Chicago, and Tampa.
- ▶ In response to the first explosion in New York, DHS immediately raised the threat level for the financial services sector to "Severe."
- ▶ Media reports quickly signaled that the New York attack may have contained radiological material.
- ▶ The Tampa explosion occurred outside of the Bank of America building in downtown Tampa, with heavy damage reported.
- ▶ While an official evacuation of the downtown area began immediately, Tampa residents across the region began a panicked, self-evacuation.
- ▶ Emergency response in Tampa was hampered by debris on the roads.
- ▶ 9-1-1 calls in Tampa experienced difficulty, as a Public Safety Answering Point (PSAP) was damaged in the explosion.

- ▶ Dosimeters registered that the Tampa explosion was also radioactive.
 - ▶ Intermittent power outages were reported within a three square mile radius of the Tampa blast site.
 - ▶ Street congestion became a major problem as residents began to flee in all directions.
 - ▶ Al Qaeda claimed responsibility for the attacks via a videotaped message on *al Jazeera*, stating that it intentionally targeted major financial centers and the military hub of ongoing U.S. operations in the Middle East.
- ▶ were intentionally targeting the U.S. economy.
 - ▶ The threat level had been lowered to “High” for financial institutions by DHS.
 - ▶ The radiological material used was shown to have been Cesium-137, and it was posited that terrorists may have obtained this through theft of medical equipment.
 - ▶ The Environmental Protection Agency (EPA) announced that radiological residue would be reduced to safe levels in areas around the blast site by July 24, 2007.

Move Two: Ongoing Response and Recovery from Attacks

Move two began on July 19, 2007, one week after the initial attacks on downtown Tampa, New York, and Chicago. Participants were faced with the dual needs of the ongoing investigation and cleanup, juxtaposed against the economic desire/necessity to return, as much as possible, to business as usual in the downtown Tampa area.

- ▶ Intelligence analysts were picking up less chatter, suggesting that the threat had passed.
 - ▶ Analysis suggested terrorists had an intimate knowledge of the financial services sector and
- ▶ The EPA had also announced that the radiological fallout from the plume was minimal and that those areas in which the plume traveled were again safe.
 - ▶ A police perimeter around the attack site remained in place.
 - ▶ A main telecommunications hub facility was severely damaged as a result of the explosion, and attempts to recover full capacity were ongoing.
 - ▶ Internet usage, as well as local and long distance calls, continued to prove troublesome for Tampa area residents.

Next Steps and Key Insights

Discussion:

Teams were asked to consider what they viewed as the key insights from an overall exercise perspective, as well as identifying potential next steps, and the role(s) FloridaFIRST could play in that process.

- ▶ Participants examined issues outside of a scenario driven environment with an eye towards broader lessons learned as a result of the simulation experience.
- ▶ There were no scenario updates during this session.
- ▶ E-mail communication was also closed during this move.

APPENDIX D:

TEAM ACTIONS

Move One Response:

In light of the catastrophic attacks and potential for radiological fallout, teams began by prioritizing their response, identifying key actions to be taken, and attempting to mitigate a deteriorating situation.

Issues considered during this move included:

- ▶ Efficacy of existing emergency response plans.
- ▶ The necessity for public messaging.
- ▶ Lockdown of facilities in close proximity of the blast site.
- ▶ Balancing concerns of radioactive contamination against the need to access the affected area in a timely manner.
- ▶ Setting up perimeters restricting the flow of people in and out of the blast zone.
- ▶ The declaration of a state of emergency by the Governor.

Move Two Response:

In move two, teams were challenged to address recovery issues, while continuing to assess and deal with the aftermath of the explosions. In

particular, teams were tasked with identifying critical actions/messages needed, as Tampa moved towards the EPA-dictated July 24, 2007 "safe" date to begin a return to business as usual.

In the course of Move 2, teams were also forced to deal with continuing telecommunications difficulties and the release of new intelligence suggesting that terrorists had detailed information regarding sensitive financial services data, including locations of critical service providers.

Issues considered during this move included:

- ▶ The safety and willingness of employees to return to areas around the blast site.
- ▶ Lingering telecommunications issues and their effect on businesses.
- ▶ Balancing the ongoing investigation against the need to return to normal.
- ▶ Controlling public perception over safety issues in downtown Tampa.
- ▶ Dealing with lingering fears over potential future attacks.

The graphic included on the following page summarizes the more significant actions taken by participants in response to moves one and two.

MOVE ONE MAJOR TEAM ACTIONS

- ▶ **State Government and Emergency Management**
 - Determinations on what is required in a radiological response
 - Activating emergency evacuation protocols
 - The Public Information Office (PIO)/ The Joint Information Center (JIC) controlling message through media quickly and calmly
 - Unified Command established
 - Recommend establishing perimeters around blast site
 - Crime scene investigation has begun
 - Analyzing effectiveness of in-place infrastructure
- ▶ **Local Government and Emergency Management**
 - JIC has been established
 - Activated mass casualty plan
 - Assessing weather conditions / notifying down-wind communities
 - Mutual aid in place – assessing needs
 - EOCs have been activated
 - Unified Command being stood up quarter mile upwind
 - Tampa Fire and Rescue leading initial decontamination response
 - The Joint Terrorism Task Force (JTTF) leading investigation
 - Perimeter established
 - Issuing public statement on self-protective measures
- ▶ **Depository Services Team**
 - Moving to ensure availability of cash
 - Prioritize essential versus non-essential lines of business
 - Communicate with other financial institutions
 - Communicate with the public to maintain consumer confidence
 - Lockdown of locations
 - Limit media contact
- ▶ **Non-Depository Services Team**
 - Declare emergency to activate contingency plans
 - Lockdown of facilities within a quarter mile perimeter of blast zone
 - Analyzing need to waive certain fees/rules during entirety of crisis
 - Tracking employee locations and status

MOVE TWO MAJOR TEAM ACTIONS

- ▶ **State Government and Emergency Management**
 - Coordinating directly public/private to assess and maintain critical infrastructure
 - Providing support to local decisions based on coordination agreements
 - Unified public message through the JIC
- ▶ **Local Government and Emergency Management**
 - Public safety communications packages in place (E-sponder)
 - Coordinating with appropriate federal agencies
 - Accelerating permit process in a push to return to normalcy
 - Press conference being held with appropriate leadership
 - Small Business Administration and bridge gap loans to increase investment in affected areas
 - Communicating directly with public over safety issues (remain calm, be vigilant)
- ▶ **Depository Services Team**
 - Contacting key clients directly
 - Communicating to public which branches are open
 - Reaching out to staff to gauge ability to return to normal operating capacity
 - Facility assessment
 - Determining liability over potentially sick / injured employees
- ▶ **Non-Depository Services Team**
 - Using hotlines, emails, and website to keep customers informed
 - Taking out print ads to emphasize “business as usual” message
 - Building and business line assessments underway
 - Augmenting security resources
 - Waiving late fees and ATM fees to encourage customers to return