



MIDDLE RIO GRANDE CONSERVANCY DISTRICT BUSINESS CONTINUITY PLAN (BCP) FOR ADDRESSING PANDEMIC OR OTHER EVENTS REQUIRING REDUCTION OR CESSATION OF OPERATIONS

This BCP will provide guidance under the District's general Emergency Response Plan to address circumstances where a portion or all of the District's operations must be suspended if a catastrophic natural or disease driven event results in or requires a temporary reduction or re-deployment of the workforce as part of the response.

First and Highest Priority: Protection of District personnel, its constituents and the general public during implementation of the response.

Following are the critical response mechanisms for the BCP:

A. Create Business Continuity Team (BCT) consisting of:

- Team Lead – CEO: Sets the priorities to be scaled and implemented based upon the severity of the event – coordinates with District leadership and other agencies as necessary – face of the District for media inquiries and public outreach
 - IT – assures continuity of connectivity for critical information flow
 - HR – assures critical personnel are in place for response level. Payroll processing; emergency hiring as needed
 - Accounting/Acquisitions – assures critical acquisitions; payment processing and cash flow for response level; emergency contracting
 - Division Managers – implements required response level in the field, provides consistent messaging to constituents and personnel as provided by CEO
1. Business Continuity Team (BCT) implements plan to address critical operational support for appropriate response level. Sets priorities based upon needed operational support and develops a plan for each priority.
 - During irrigation season: Scheduling and delivering water to irrigators; supporting system operations with equipment and other services; responding to emergency overflows; critical maintenance.
 - Year-round: Performing payroll and accounts payable functions; assisting constituents with billing, payment and land matters; critical construction and/or maintenance work. Emergency response.
 2. Identify the trigger based on but not limited to the NM Department of Health advisories and guidelines, the BCT will make the decision on implementation plan and timing how operations will be affected; coordinate with State Public Health or

Emergency Response Teams to assist in determining appropriate response level as well as timing window.

3. Identify essential personnel for business operations to continue; each Division will assess needs and essential staffing required and make recommendations to the CEO on employee rotation plan for appropriate response level. Divisions' will provide a response plan staffing sheet to be attached to the BCP and will be updated annually with names and contact numbers of key Division personnel.
4. Identify constituents who will be most affected and communicate our intent and identify how we will contact them and/or assist them.
5. Identify how we contact non-essential personnel/employees during release and call-back periods.
6. Ensure appropriate offices have emergency kits and basic supplies if employees must remain on the District's premises or in the field for extended periods.
7. Prepare for employees' absences:
 - Determine minimum staffing levels required to perform identified priorities and determine operational strategies during an interruption.
 - Determine what other considerations need to be addressed such as helping employees assure family safety particularly if school age children are impacted by school closures, etc., and what other external factors/processes may affect the District such as fuel shortages or utility failures.

B. ASSURING MRGCD OPERATIONS

To assure the safety and welfare of employees and its customers during a pandemic or other catastrophic event the following will be implemented:

1. Increase telecommuting arrangements or relax requirements in reporting to work.
2. Implement staggered shifts or other alternative work schedules:
 - Create work schedule rotation of skeleton crews to report directly to their work areas and not report to or congregate in the main office locations to limit exposure.
 - Implement extended on-call work schedule.
3. Employ social distancing measures (3 to 5 feet separation) among employees and constituents:
 - Eliminate handshaking and/or "side hugs".
4. Post information and updates to District website (identify who is responsible for this task and what they will communicate).
5. Avoid travel to high risk areas, any scheduled training and/or work travel may be postponed or canceled.
6. Employ technology strategies to help the District function despite employees' inability to work together:
 - Install VPN Client on designated workstations that may be set up in appropriate employees' residences.
7. Employ exposure preventive measures:
 - Limit face-to-face meetings.

- Provide tissues, hand sanitizers, sanitizing wipes, and masks to employees.
- Provide PPE (gloves) to employees engaging with the public and handling money, credit cards and checks.
- Consider limiting public access on a temporary basis with proper notice to the public.
- Educate employees on proper hand washing techniques and reminding them to not touch their faces.
- Send symptomatic employees home.
- Temporarily shut down operations, if necessary.
- Limit engagement with Independent Contractors and the general public.

C. Employee Pay and Benefits Considerations:

1. Decide payroll strategies to assure employees continue to receive pay during operational slow down or shut down and for how long.
2. Provide a “no-fault” attendance policy and temporarily forgo counting absences during an operation shut down.
3. Decide how to handle paid leave benefits for:
 1. “Excessive” absences related to employees’ illness.
 2. Accommodating family illnesses.
 3. Apply the District paid leave policy in the event of a school or childcare facility closing.
 4. Prolonged absences due to illness will require substantiation (i.e. doctor’s notes as per District policy).
 5. Implement flexible leave policy on a temporary basis, if necessary.
 6. Use donated leave policy for employees who exhaust leave banks to require employees who are sick and have no leave to stay at home.
4. Review legal obligations to employees:
 1. Generally, we will have to ensure that we are not exposing employees to any known threats, and we must provide reasonable accommodations to employees.
 2. Careful to not unnecessarily discipline employees who refuse to come into work during peak pandemic period out of fear of contracting the virus; will need to consult state health officials on decreasing level of exposures in order to have a work call back procedure that then negates employees’ self-determination stance.
 3. Employees’ leave to take care of themselves or family members are likely protected under various leave laws such as the Federal Family Medical Leave Act (“FMLA”).

D. Business Recovery

1. Communicate to constituents that business has returned to normal and provide effective date when they can expect normal operations to commence, i.e. water delivery, making payments, picking up keys, etc.

2. Communicate to all employees that business has returned to normal and when normal operations will commence requiring resumption of normal work schedules.
3. Notify employees and customers that policies or rules that were temporarily lifted, added or changed to accommodate the crisis are now back to normal.
4. Perform lessons-learned session with BCT and others to refine BCP and Emergency Response Plan.