

# Participating in a regional public-private emergency partnership – why do it and how do you make it work?

**Brian S. Tishuk**

*Received (in revised form): 16th April, 2007*

ChicagoFIRST, 540 West Madison Street, Suite 2214, Chicago, IL 60661, USA  
Tel: +1 312 992 0603; Fax: +1 312 992 1622; e-mail: brian.tishuk@chicagofirst.org

**Brian S. Tishuk** is the Executive Director of ChicagoFIRST, a nonprofit association of Chicago financial institutions that collaborate on business continuity and homeland security matters. Prior to joining ChicagoFIRST in 2004, Brian enjoyed a 19-year career at the US Treasury Department, during which he addressed a vast array of public policy issues affecting financial institutions, from the savings and loan crisis of the mid-1980s to the attacks of September 11th. Brian led Treasury efforts to enhance the resilience of financial institutions, establishing the Office of Critical Infrastructure Protection and Compliance Policy and serving as its Acting Director and Deputy Director. Brian has an undergraduate degree from Lawrence University in Appleton, Wisconsin; a master's degree in public policy from the University of Michigan; and a law degree from Georgetown University.

## ABSTRACT

*An ongoing relationship with government is essential to a robust and evolving business continuity plan. Each level of government plays an important role in handling a disaster, and private sector firms must understand those roles and what they can and cannot expect from the public sector in a time of crisis. Through a relationship with the public sector, firms may be able to obtain daily incident information, access to an operations centre during an emergency, and*

*cooperation in learning more about evacuations, credentialing, pandemic planning and other critical issues. This paper demonstrates the value of forging such a relationship with government through a regional partnership. Especially during a crisis, state and local government cannot coordinate effectively with each individual company. Therefore, coalitions constitute a valuable tool for interaction. Through a regional partnership, firms can also participate in the national public-private partnership on homeland security that has been established since September 11th. The information thus obtained will be most valuable to business continuity planners. Moreover, firms will have a voice in government emergency planning at all levels. The first such partnership was established by ChicagoFIRST, and this organisation serves as a case study about the methods by which firms benefit from such a partnership.*

**Keywords:** *ChicagoFIRST, RPCfirst, public-private partnership, business continuity planning, homeland security*

## ENHANCING ORGANISATIONAL RESILIENCE

All disasters are local; that is, an individual, a family, or a business will be affected most directly in its community and will have to prepare for and respond to a disaster within that community's



geographic, cultural and political context. Whether the event is natural or manmade, intentional or accidental, as limited as a building fire or as global as a pandemic, the first responders on the scene will come from local or county police, fire and emergency management.

The success of a firm's business continuity plan will thus depend upon and should be integrated with the emergency response plans and procedures of local government, as well as demanding an understanding of the roles to be played by other levels of government. Although this paper uses specific examples from the US financial sector, its concepts apply to any sector in any country.

### Gaps in plans

Is it known how first responders prepare for and respond to various types of incidents? Is it known how they will conduct or when they will require evacuations, how well they interact with other jurisdictions, or whether they understand the importance of a line of business or the particular facility affected?

The effectiveness of an emergency plan and the safety of employees depend upon the answers to such questions. For example, if employees have been taught to evacuate in one direction, one does not want to find out in the middle of a disaster that the local responders had always planned to send personnel in a different direction. Similarly, if a company building is affected by an incident, staff may be well situated to assist local responders. But if the emergency managers in charge of the scene do not know the key personnel, the assistance offered may be declined, or accepted only after precious time is spent checking credentials.

### Building trusted relationships

A crisis is not the time to be introduced to the first responders and exchange busi-

---

**Table 1: ChicagoFIRST members**

---

ABN AMRO/LaSalle Bank
Allstate
Aon
Ariel Capital Management
Bank of America
Chicago Board of Trade
Chicago Board Options Exchange
Chicago Mercantile Exchange
Chicago Stock Exchange
CNA
Federal Home Loan Bank of Chicago
Fidelity National Information Systems
Global Electronic Trading Company
Goldman Sachs
Harris Bank
JP Morgan Chase
Man Financial
Mesirow Financial
Mizuho Securities USA Inc.
Northern Trust Bank
NYSE Group
The Options Clearing Corporation
PrivateBank and Trust
UBS
Washington Mutual
William Blair & Company

---

ness cards. This notion forms the basis of the ChicagoFIRST<sup>1</sup> motto<sup>2</sup> and highlights the company's mission. More than two dozen financial institutions in the Chicago area rely on ChicagoFIRST to collaborate with the City of Chicago on emergency management issues relevant to the financial community as a whole. These members are listed in Table 1.

Establishing such relationships with local emergency responders can be best accomplished through a regional public-private partnership like ChicagoFIRST.

Fire drills and exercises with local responders are important, but much more can be done, as will be outlined in this paper. Moreover, through partnerships like ChicagoFIRST, it is possible to tap into the national public-private partnership, which includes the US Department

of Homeland Security (DHS). It should not require much imagination to understand how better coordination among the three levels of government and between government and the private sector would have reduced the devastation of Katrina. It could prove invaluable in a company's own area as well.

### THE NATIONAL PARTNERSHIP

Before describing ChicagoFIRST, a brief explanation of the national partnership and how ChicagoFIRST derived from it is in order. The national public-private partnership developed in two stages. First, the financial sector organised the financial regulators and private sector into two related committees. In the second stage, DHS applied this structure to the other sectors of the economy.

#### The partnership model

The concept of a partnership between the government and private firms on security and economic resilience can be traced to Presidential Decision Directive 63 (PDD 63), which was issued by the US President in 1998.<sup>3</sup> PDD 63 divided the economy into a number of critical sectors that must be protected from physical and cyber attack and identified federal entities that were to serve as lead agencies for the sectors.<sup>4</sup> The lead agencies and their respective critical sectors are presented in Table 2.

Because the private sector owns a majority of the assets in these sectors<sup>5</sup> and the goal was to be achieved without regulatory requirements,<sup>6</sup> PDD 63 called for collaboration between the public and private sectors and referred to this as a partnership.<sup>7</sup> Responsibility within the Federal Government for achieving the goals of PDD 63 rested with the lead agencies for each critical sector.<sup>8</sup> These agencies were tasked with coordinating

---

**Table 2: PDD 63 lead federal agencies and critical sectors**

---

Department of Commerce:	Information and Communications
Department of Treasury:	Banking and Finance
Environmental Protection Agency:	Water Supply
Department of Transportation:	Aviation Highways Mass Transit Pipelines Rail Waterborne Commerce
Department of Health and Human Services:	Public Health Services
Department of Energy:	Electric Power Oil and Gas Production and Storage
Department of Justice:	Emergency Law Enforcement Services Emergency Fire Services
Federal Emergency Management Agency:	Continuity of Government

---

with the representatives of their respective sectors and together developing plans for protecting their physical and cyber assets.<sup>9</sup>

PDD 63 also called for the establishment of information-sharing and analysis centres (ISACs).<sup>10</sup> Firms within a sector would form an ISAC as a mechanism for the anonymous gathering, analysing and sharing of physical and cyber incidents that would be likely to affect the other members of the ISAC. When appropriate, information would also be shared with the government. The financial sector established the first ISAC in 1999,<sup>11</sup> and it continues to be the most sophisticated and vibrant. As will be seen below, the partnership approach evolved following the attacks of September 11th. One of the most important developments came when the White House updated PDD 63 with Homeland Security Presidential Directive 7.<sup>12</sup>

**Table 3: FBIIC members**


---

Commodity Futures Trading Commission
Conference of State Bank Supervisors
Department of the Treasury
Farm Credit Administration
Federal Deposit Insurance Corporation
Federal Housing Finance Board
Federal Reserve Bank of New York
Federal Reserve Board
National Association of Insurance Commissioners
National Association of State Credit Union Supervisors
National Credit Union Administration
North American Securities Administrators Association
Office of the Comptroller of the Currency
Office of Federal Housing Enterprise Oversight
Office of Thrift Supervision
Securities and Exchange Commission
Securities Investor Protection Corporation

---

**The financial sector partnership**

Prior to the terrorist attacks of September 11th, the White House prepared an executive order establishing an organisational structure for enhancing cyber security, which was ultimately published in October 2001.<sup>13</sup> The executive order directed the US Department of Treasury to chair a new committee called the Financial and Banking Information Infrastructure Committee (FBIIC), which would consist of the Treasury and the federal financial regulators.<sup>14</sup>

In light of the September 11th attacks, the Treasury broadened its membership to include state regulators, and altered its mission for the committee, from focusing exclusively on cyber issues to enhancing the resilience of the financial sector in the event of physical attacks. With this new vision, FBIIC held its inaugural meeting on 10th January, 2002,<sup>15</sup> and its members are listed in Table 3.

In addition to placing all of the relevant federal and state financial regulators in FBIIC, the Treasury orchestrated the es-

tablishment of a private sector corollary, the Financial Services Sector Coordinating Council (FSSCC).<sup>16</sup> FSSCC members include the major financial trade associations and what are termed financial utilities, namely, exchanges and clearing organisations. FSSCC held its inaugural meeting on 19th June, 2002, and its members are listed in Table 4.

Since their inception, FBIIC and FSSCC have identified financial sector vulnerabilities and coordinated on methods of reducing those vulnerabilities, as well as on methods of promoting the resilience of the sector overall. These entities meet on a regular basis and have established working groups to address various issues, including pandemic influenza, secure communications, research and development needs, and methods of improving various information-sharing channels.

**Department of Homeland Security partnership structure**

The September 11th attacks led to the formation of the Office of Homeland Security (OHS) within the White House.<sup>17</sup> This office interacted with FBIIC and FSSCC until the DHS was created by legislation in 2002.<sup>18</sup>

In issuing Homeland Security Presidential Directive 7 in late 2003, the President extended the partnership structure of the financial sector to each of the other critical sectors.<sup>19</sup> Among other things, it called for the formation of government coordinating councils and sector coordinating councils that would collaborate in much the same fashion as FBIIC and FSSCC<sup>20</sup> in each of the 17 critical sectors identified by DHS and listed in Table 5.<sup>21</sup>

The actions of DHS, the various sector coordinating councils, and other components of the homeland security structure will very likely affect an industry, whether directly or indirectly, and

**Table 4: FSSCC members**


---

America's Community Bankers  
 American Bankers Association  
 American Council of Life Insurers  
 American Insurance Association  
 American Society for Industrial Security  
 International  
 BAI  
 BITS/The Financial Services Roundtable  
 ChicagoFIRST  
 Chicago Mercantile Exchange  
 The Clearing House  
 CLS Group  
 Consumer Bankers Association  
 Credit Union National Association  
 The Depository Trust & Clearing Corporation  
 Fannie Mae  
 Financial Information Forum  
 Financial Services Information Sharing and  
 Analysis Center, LLC  
 Financial Services Technology Consortium  
 Futures Industry Association  
 Independent Community Bankers of America  
 Investment Company Institute  
 Managed Funds Association  
 The NASDAQ Stock Market, Inc.  
 National Association of Federal Credit Unions  
 National Association of Securities Dealers  
 National Futures Association  
 NACHA — The Electronic Payments  
 Association  
 New York Board of Trade  
 The Options Clearing Corporation  
 Securities Industry Automation Corporation  
 Securities Industry and Financial Markets  
 Association  
 VISA USA Inc.

---

whether or not those effects are apparent. It is therefore important to understand the policies being adopted by DHS, the activities of the sector in which the company is found, and the activities of the sectors on which it relies.

### **THE REGIONAL PARTNERSHIP**

The most effective way to collaborate with local government and tap into the national

**Table 5: Sector-specific agencies and critical sectors**


---

Departments of Agriculture and Health and Human Services:  
 Agriculture and Food  
 Department of Defense:  
 Defense Industrial Base  
 Department of Energy:  
 Energy  
 Department of Health and Human Services:  
 Public Health and Healthcare  
 Department of Interior:  
 National Monuments and Icons  
 Department of Treasury:  
 Banking and Finance  
 Environmental Protection Agency:  
 Drinking Water and Water Treatment Systems  
 Department of Homeland Security:  
 Chemical  
 Commercial Facilities  
 Dams  
 Emergency Services  
 Commercial Nuclear Reactors, Materials, and Waste  
 Information Technology  
 Telecommunications  
 Postal and Shipping  
 Transportation Systems  
 Government Facilities

---

partnership is to form a regional partnership, which will work directly with its national partnership counterpart. This will not only result in valuable information, but also a voice in a process that could have serious implications for individual firms and their business continuity plans.

### **Why participate in one?**

First and foremost, the government cannot possibly perform this function alone. The private sector owns most of the critical assets, and the Federal Government continues to believe that a heavy-handed regulatory approach would be economically counterproductive. Moreover, the Federal Government lacks the personnel and expertise to

understand how various emergencies would affect the multiplicity of sectors; only the owners and operators within their respective sectors possess such knowledge.

Secondly, even if the Federal Government sought to protect critical infrastructure on its own, the result would be less than optimal. For obvious reasons, government tends to take a 'one-size-fits-all' approach, which is not the best method of identifying and mitigating threats and vulnerabilities in highly-specialised sectors. At the same time, such an approach will not mesh well with the regionally diverse emergency response structures established in various cities, counties and states.

Thirdly, if the Federal Government subsidised the cost of regional partnerships, the private sector may be more inclined to form them. However, the private sector would no longer be able to lead them; instead, the Federal Government would control the agenda and the partnerships would always be vulnerable to the federal budget process.

Fourthly, as the owner of most of the critical infrastructure, the private sector bears a responsibility for protecting those assets. Whereas the government focuses on the enormous negative externalities that would result from the disruption of critical assets, the private sector owner is rightly concerned with generating profits with those assets. Thus, both parties want the critical assets to function without interruption, and both have a responsibility to see that they do. The regional partnership model affords an opportunity for the private sector to achieve its goals in the most efficient manner and with the least amount of government interference.

#### **Replicating the financial sector model**

The financial sector offers an example of how to form and benefit from a regional

partnership. Following September 11th, companies revised their business continuity plans, various financial industries adopted and shared best practices and, as noted above, the sector formed a national public-private partnership. In addition, the financial community in Chicago formed the first regional partnership aimed at achieving these goals and including all types of financial institutions within the city.<sup>22</sup>

ChicagoFIRST is a nonprofit organisation dedicated to addressing homeland security and emergency management issues affecting financial institutions and requiring a coordinated response. The members of ChicagoFIRST have put competition aside to promote employee safety and business continuity.

#### **CHICAGOFIRST CASE STUDY**

The concept behind ChicagoFIRST is straightforward and may be replicated in any region, in any sector, among sectors, and in any country. In fact, the model lends itself to membership from multiple sectors, and a few organisations that have followed in the wake of ChicagoFIRST have non-financial members. Although many organisations find filing for legal incorporation beneficial, it is neither necessary nor universally sought.

The key to the ChicagoFIRST model is bringing together the key firms within a local or regional economy to address common business continuity issues together, and then leveraging that relationship with government so as to better inform and coordinate their respective business continuity plans. The ChicagoFIRST case study delineated below constitutes an illustrative example of how such an effort could be organised and the types of goals that could be achieved that would otherwise not be feasible.

## Leadership

In late 2002, various members of the Chicago financial community began exploring ways to better coordinate around homeland security issues. At the same time, the US Treasury Department began visiting Chicago to determine whether the financial community would be interested in forming a regional partnership. With the FBIIC and FSSCC established at the national level, the Treasury sought to begin in Chicago the process of establishing such partnerships within the financial sector.<sup>23</sup> Among other things, the Treasury met individually and collectively with Chicago financial firms, as well as with the Chicago Federal Reserve Bank and the City of Chicago's Office of Emergency Management and Communications.

Two financial institutions joined forces in early 2003 to bring the community together: LaSalle Bank/ABN-AMRO and The Options Clearing Corporation. Representatives of these firms met with the key financial firms and found much agreement about the need to coordinate activities. These meetings resulted in the formation of ChicagoFIRST by 14 firms, and they immediately began working with the City of Chicago. A formal announcement of the alliance was made in July 2003, with participation from the City of Chicago and the US Treasury Department, as well as ChicagoFIRST members.<sup>24</sup>

## Common goals

The original 14 members found agreement in working with the City to:

- obtain a seat in the Chicago emergency operations centre so that in a crisis the financial community would receive vital information in a timely fashion and could report to the city on the status of the financial community;
- establish credentials (or passes) for essential personnel to access business facilities in the event of an evacuation; and
- develop and communicate standard procedures for employees who need to evacuate a building or a wider area.

In each case, business continuity plans depended upon information that only the City could provide, and the City was much more interested in working with one entity that could represent a sector.

ChicagoFIRST obtained its seat in the emergency operations centre later in 2003. With this success, the members decided that the organisation would be even more effective if the member-volunteers were complemented with a full-time employee. So they formed a corporation and agreed to pay dues so that they could hire and compensate a director.

## Organisation growth

ChicagoFIRST has grown from 14 to 26 members. In addition, it interacts with a host of public sector partners. Members meet quarterly, while a board of directors meets monthly. In addition, the organisation holds quarterly meetings with its strategic partners, which can be found in Table 6.

Furthermore, working groups have been formed to address such issues as pandemic influenza, security, public relations, telecommunications and best practices. The organisation's success led to a workload that resulted in the hiring of a deputy director in 2006.

## THE PARTNERSHIP BUSINESS CASE

Forming and maintaining a partnership will require time and some funding, but it need only require as much of these as is deemed necessary. At whatever level of commitment, a regional partnership will yield tangible and intangible benefits that

---

**Table 6: ChicagoFIRST strategic partners**

---

American Red Cross of Greater Chicago  
 Chicago Office of Emergency Management and Communications  
 Chicago Police Department  
 Commodity Futures Trading Commission  
 FBI InfraGard — Chicago Chapter  
 Federal Deposit Insurance Corporation  
 Federal Emergency Management Agency  
 Federal Reserve Bank of Chicago  
 FBIIC  
 FS-ISAC  
 Financial Services Roundtable/BITS  
 FSSCC  
 Futures Industry Association  
 Illinois Department of Financial and Professional Regulation  
 Illinois Emergency Management Agency  
 Illinois State Police  
 Illinois Terrorism Task Force  
 National Futures Association  
 Office of the Comptroller of the Currency  
 Securities and Exchange Commission  
 Securities Industry & Financial Markets Association  
 US Department of Homeland Security  
 US Department of Treasury  
 US Secret Service

---

justify the resources. Below is a brief illustration of how ChicagoFIRST generates value in return for the dues its members pay.

#### **Trusted information streams**

The seat in the emergency operations centre was an important milestone. ChicagoFIRST is assured of being able to be in the same room with the relevant city, state and federal agencies, as well as the utility companies in the event of a crisis or significant event.

For example, during two immigrant rights marches in Chicago during 2006, ChicagoFIRST used that seat to post information about the marchers and their

routes to the private side of its website. This was done on a real-time basis to keep members apprised of the movement of large numbers of protesters, which could have affected any given member's organisation or employees, particularly with respect to transportation. In this way, the members were kept apprised of which streets were closing and which were opening by pulling information from the website. As the need for time-sensitive information, clarification, or rumour control arose, as it always does during a major event, such information was obtained from the parties in the room and was both posted to the website and pushed out to ChicagoFIRST members via e-mail advisories.

Although the formal seat is valuable, the informal relationships fostered as a result of having the seat have proven to be invaluable. The trust and credibility that ChicagoFIRST has established with the City of Chicago as a result of seeking, obtaining and using its seat have led them to provide the leadership of ChicagoFIRST with information on a daily basis.

For example, the Office of Emergency Management and Communications and the Chicago Police Department both informed ChicagoFIRST, on the morning of 1st August, 2004, about the credible threat against financial institutions that DHS announced later that afternoon and coordinated their physical response to this threat with ChicagoFIRST. The City assured ChicagoFIRST that Chicago was not targeted, but, because financial institutions were, they would increase their vigilance within the financial district.

ChicagoFIRST was also informed about a key electrical transmission tower that was to be taken out of service. This was deemed important, because it was thought that the power supply would have no backup as a result. Each member

was alerted to this fact. As it turned out, another backup existed, but this type of information is vital to business operations. In fact, a third-party provider of information informed its clients that there would be rolling brownouts in the downtown area. That was never a possibility, but it highlights the value of a relationship with the government entities that have the most accurate and authoritative information.

During the LaSalle Bank fire in 2004, its Chief Continuity Officer was able to access the scene and assist the first responders quickly, because the parties knew one another through ChicagoFIRST. The officer did not lose time explaining who he was and how he could help. (The LaSalle Bank fire case study was documented in a recent issue of this journal.<sup>25</sup>)

These informal exchanges continue to be invaluable, and they have been supplemented with more formal e-mail alerting systems that the Chicago police and ChicagoFIRST continue to use and improve.

### **Credentialing and evacuations**

ChicagoFIRST has made substantial progress on obtaining identification cards (ie credentials) that would grant access for critical personnel to areas restricted because of an incident. Such access may be necessary to assess damage, collect important assets, or to conduct business, provided the area is neither unsafe nor a crime scene. Although reticent to develop a credentialing process, the City, at the urging of ChicagoFIRST, did just that in 2005. ChicagoFIRST has been piloting it since then, and the City has now decided to formalise the system.

With respect to evacuations, ChicagoFIRST has continuously urged the City to further develop and exercise its plans with the private sector, which

was done in 2006. Assisting the City with planning and execution of the exercise, ChicagoFIRST participated in an evacuation of four downtown skyscrapers during the beginning stages of the rush hour.

The credentialing system and evacuation procedures continue to be a work in progress, but far more has been accomplished as a result of having a partnership than ever would have been accomplished without it.

### **Pandemic planning**

The pandemic working group includes the City's public health department, the State Public Health Department and the Office of Emergency Management. The members have discussed their plans candidly, with one member distributing copies of its plan. The local government has shared its draft planning assumptions and its trigger points for various actions. Through this process, the government has learned how serious the private sector is about preparing for this event and exactly why the information they possess should be shared.

The pandemic working group held its own tabletop exercise, and ChicagoFIRST planned and executed a pandemic tabletop with Treasury support. A survey of members also revealed how the financial community is preparing for a pandemic. One of the most interesting findings was that every respondent will implement some form of telecommuting if the pandemic occurs. In light of the internet congestion expected in such a situation, ChicagoFIRST is leveraging its membership and relationship with FSSCC to work with the Federal Government on possible solutions.

### **Direct business continuity plan inputs**

ChicagoFIRST has established a system whereby alerts are provided to mem-

bers via various communications devices. Some smaller members have incorporated these streams directly into their plans. In addition, all members expect to receive information from ChicagoFIRST during a crisis. Such a reliable and timely source of information is essential when executing a business continuity plan.

### CHICAGOFIRST AS THE MODEL

Many sources have identified ChicagoFIRST as a model to be emulated, including the US Treasury Department<sup>26</sup> and the legislation creating the 9/11 Commission.<sup>27</sup> More important than any governmental imprimatur, however, is the fact that ChicagoFIRST has successfully addressed the very issues that should concern any firm.

Obtaining a seat in the local or county emergency operations centre should be high on the list of business continuity goals. Such an informal relationship will yield immediate benefits. Credentialing and better information about evacuations are also valuable for any organisation. These can only be done in coordination with the Government, and a company will be far more successful through a regional partnership than on its own. In addition, the Government appreciates having a single point of contact, rather than a lengthy call tree that it could not possibly navigate during a crisis.

Tabletops and other exercises may serve as an incentive to bring various firms together, whether within a sector or among sectors. The results would also contribute to identifying the gaps and vulnerabilities that may be best addressed through coordinated efforts, as well as providing individual firms with valuable information about their own operations and plans. When a partnership is formed, the communications and other protocols and systems can and should be tested.

### OTHER CITIES ADOPTING THE CHICAGOFIRST MODEL

Since 2003, the US Treasury Department and the Federal Deposit Insurance Corporation have held conferences across the USA to inform financial institutions about the national public-private partnership and to encourage other regions to form organisations like ChicagoFIRST. Various FBIIC and FSSCC members have supported these efforts.

The outreach has borne fruit, if measured by the number of partnerships that have followed in the wake of ChicagoFIRST. Ten regions have formed partnerships that are fairly well established, while another half-dozen or more cities are moving towards forming such organisations, as illustrated in Tables 7 and 8.

To illustrate the flexibility of the model, the Minnesota Information Sharing and Analysis Center is being led by Wells Fargo, but includes Best Buy, Target and 3M on its board. Whereas the Alabama Recovery Coalition for the Financial Sector covers the entire state with one organisation, FloridaFIRST is establishing several regions within the state. Miami and Tampa have been formed, and Jacksonville is scheduled for 2007. BARC*first* (Bay Area Recovery Coalition) covers the broader San Francisco Bay area, while SoCal*first* reaches out to all of southern California, including Los Angeles. One size most assuredly does *not* fit all, and the diversity among these organisations illustrates this.

Like ChicagoFIRST, several have incorporated as 501(c)(6) entities under the US tax code, where costs may be deducted for tax purposes as business expenses. Others have formed as 501(c)(3) organisations, payments to which may be deducted as charitable contributions. Still others are seeking to participate less formally in an existing structure.

---

**Table 7: Established regional partnerships**

---

Alabama Recovery Coalition for the Financial Sector  
 BARC*first* (San Francisco Bay area)  
 ChicagoFIRST  
 DelVal FIRST (Philadelphia area)  
 DFW FIRST (Dallas/Ft. Worth area)  
 FloridaFIRST, Miami Region  
 FloridaFIRST, Tampa Bay Region  
 HoustonFIRST  
 Minnesota Information Sharing & Analysis Center  
 Minnesota Security Board  
 SoCal*first* (Los Angeles area)

---



---

**Table 8: Developing regional partnerships**

---

Colorado  
 Hawaii  
 North Carolina  
 Seattle  
 Tennessee  
 Washington, DC

---

## PLUGGING REGIONAL INTO NATIONAL

In addition to filling gaps in business continuity plans with information from local government, these organisations can plug into the national partnership and bring an even greater array of government planning and thinking to plans. In the case of the financial sector, these partnerships are all working together through an organisation of regional partnerships called RPC*first*.<sup>28</sup> Through this organisation, the partnerships share best practices about both the substantive issues they have in common as well as the finer points of establishing a legal entity, identifying members, drafting bylaws, etc. ChicagoFIRST took the lead in forming RPC*first* in 2006.

Through ChicagoFIRST, RPC*first* participates in FSSCC, which, in turn, interacts with Treasury, DHS and all of the other critical sectors. National homeland security policy is being set at the national level, and participation in a sector coordinating council will provide a voice on matters that might otherwise be presented as a *fait accompli*.

For example, the National Infrastructure Protection Plan requires each critical sector to develop a plan for reducing vulnerabilities.<sup>29</sup> These plans must establish goals and metrics that DHS will evaluate and measure. Through FSSCC, ChicagoFIRST and the RPC*first* members had an opportunity to review a draft and provide comments and suggested language. Perhaps more tangible was the opportunity to review an FSSCC comment letter on a request by the Department of Health and Human Services for guidance on prioritising pre-pandemic and pandemic influenza vaccines. Through the FSSCC letter, the financial sector identified some of its critical operations and estimated the number of critical employees supporting those operations who would need to be vaccinated.

Another example can be drawn from the current effort by DHS to revise its National Response Plan (NRP). An organisation that includes competitors, and even other sectors, will garner credibility with DHS. It will also provide the means to participate in the process by which DHS plans to interact with the private sector during a crisis. The NRP constitutes a comprehensive all-hazards approach to federal coordination with local, state and private sector actions in the wake of a crisis.<sup>30</sup> Through the FSSCC, the members of the various regional partnerships within the financial sector have had an opportunity to help define the private sector role within the NRP.

## NEVER WAIT FOR A CRISIS

Always remember a crisis is no time to exchange business cards. This should be a guiding principle in business continuity planning. The discussion of the financial sector in this paper should encourage reaching out to competitors and third-party vendor firms (eg power, telecommunications, water and finance) to discuss methods of coordinating with one another and as a group with the government.

The ChicagoFIRST model can be easily replicated. Interested firms should meet, identify the needs commonly shared, and initiate discussions about them with the government. The important thing is simply to begin. If an organisation already exists in an area, a company should ask to join. Resources are too limited to reinvent the wheel.

Much of the work has been done, and it can easily be pulled off of the shelf. Feel free to contact the author with questions.

## REFERENCES

- (1) ChicagoFIRST stands for Chicago Financial Industry Resilience and Security through Teamwork.
- (2) The ChicagoFIRST motto: A crisis is no time to exchange business cards.
- (3) White House (1998) 'Presidential Decision Directive/NSC-63: Critical Infrastructure Protection', available at: <http://www.fas.org/irp/offdocs/pdd-63.htm> (accessed 3rd May, 2007).
- (4) *Ibid.*, p. 10.
- (5) *Ibid.*, p. 1. See also Office of the Federal Register (1996) 'Executive Order No. 13,010: Critical Infrastructure Protection', *Federal Register*, Vol. 61, No. 138, p. 37,347, available at: <http://www.fas.org/irp/offdocs/eo13010.htm> (accessed 3rd May, 2007).
- (6) White House, ref. 3 above, pp. 3, 5.
- (7) *Ibid.*, pp. 3–5.
- (8) *Ibid.*, p. 10.
- (9) *Ibid.*, p. 7.
- (10) *Ibid.*, pp. 13–14.
- (11) Financial Services Information Sharing and Analysis Center (no date) 'Frequently Asked Questions', available at: <http://www.fsisac.com/faqs> (accessed 3rd May, 2007).
- (12) White House (2003) 'Homeland Security Presidential Directive 7: Critical Infrastructure Identification, Prioritization, and Protection', press release, 17th December, available at: <http://www.whitehouse.gov/news/releases/2003/12/20031217-5.html> (accessed 3rd May, 2007).
- (13) White House (2001) 'Executive Order No. 13,231: Critical Infrastructure Protection in the Information Age', *Federal Register*, Vol. 66, No. 202, p. 53,063; press release, 16th October, available at: <http://www.whitehouse.gov/news/releases/2001/10/20011016-12.html> (accessed 3rd May, 2007).
- (14) *Ibid.*, section 8(c)(x).
- (15) Information about FBIIC is available at: <http://www.fbiic.gov>.
- (16) Information about FSSCC is available at: <https://www.fsscc.org>.
- (17) White House (2001) 'Executive Order No. 13,228: Establishing the Office of Homeland Security and the Homeland Security Council', *Federal Register*, Vol. 66, No. 196, p. 51,812; press release, 10th October, available at: <http://www.whitehouse.gov/news/releases/2001/10/20011008-2.html> (accessed 3rd May, 2007).
- (18) The Department of Homeland Security Act of 2002, Public Law No. 107-296, 116 Stat. 2135, available at: [http://www.dhs.gov/xlibrary/assets/hr\\_5005\\_enr.pdf](http://www.dhs.gov/xlibrary/assets/hr_5005_enr.pdf) (accessed 3rd May, 2007).
- (19) White House, ref. 12 above, paragraphs 15 and 18.
- (20) Department of Homeland Security (2006) 'National Infrastructure

- Protection Plan', pp. 52, 54, available at: [http://www.dhs.gov/xlibrary/assets/NIPP\\_SectorPartnership.pdf](http://www.dhs.gov/xlibrary/assets/NIPP_SectorPartnership.pdf) (accessed 3rd May, 2007).
- (21) *Ibid.*, p. 20.
- (22) The Securities Industry Association (SIA) in New York City has fostered a productive and well-established partnership between the securities industry and local, state and Federal Government that pre-dates ChicagoFIRST. However, the SIA is a trade association, and the benefits of its relationships are not available to all New York City financial institutions regardless of charter. (Note: the SIA has merged with the Bond Market Association, and its new name is SIFMA, for the Securities Industry and Financial Markets Association — see <http://www.sifma.org>.)
- (23) Because of the well-established relationships between the securities industry and government in New York City, the Treasury Department turned its attention to the Chicago markets.
- (24) ChicagoFIRST (2003) 'Chicago Financial Institutions Unveil 'ChicagoFIRST' Coalition for Homeland Security: Department of Treasury and Chicago OEMC Pledge Coalition Support', press release, 10th July, available at: [https://www.chicagofirst.org/press/2003/press\\_20030710.jsp](https://www.chicagofirst.org/press/2003/press_20030710.jsp) (accessed 3rd May, 2007).
- (25) Smith, J. (2006) 'The LaSalle Bank fire: How critical operations were available next day, strategic advantage leveraged and lessons learned', *Journal of Business Continuity & Emergency Planning*, Vol. 1, No. 1, pp. 55–64.
- (26) US Department of the Treasury (2004) 'Improving Business Continuity in the Financial Services Sector: A Model for Starting Regional Coalitions', available at: [http://www.ustreas.gov/press/releases/reports/chicagofirst\\_handbook.pdf](http://www.ustreas.gov/press/releases/reports/chicagofirst_handbook.pdf) (accessed 3rd May, 2007).
- (27) Intelligence Reform and Terrorism Prevention Act of 2004, section 7802, Public Law No. 108-458, 118 Stat. 3861, available at: [https://www.chicagofirst.org/legislative/intel\\_reform\\_and\\_terrorism\\_prevention\\_act\\_2004.pdf](https://www.chicagofirst.org/legislative/intel_reform_and_terrorism_prevention_act_2004.pdf) (accessed 3rd May, 2007).
- (28) RPC<sub>first</sub> stands for Regional Partnership Council for Financial Industry Resilience, Security, and Teamwork.
- (29) Department of Homeland Security, ref. 20 above, pp. 75–76.
- (30) US Department of Homeland Security (2006) 'National Response Plan', available at: [http://www.dhs.gov/xprepresp/committees/editorial\\_0556.shtm](http://www.dhs.gov/xprepresp/committees/editorial_0556.shtm) (accessed 22nd May, 2007).