

# Business Continuity Planning **Workshop**

Participant Materials



# Basic Concepts for Business Continuity Planning

## What is business continuity?

Business Continuity (BC) is defined as the capability of the organization to continue delivery of products or services at acceptable predefined levels following a disruptive incident.\*

Business continuity planning (BCP) includes the development of policies, protocols, and documents to help your organization maintain health care delivery operations during an emergency or disaster.

BCP also includes the implementation of mitigation activities before an incident occurs to minimize disruption to your organization.

\*From the [Business Continuity Institute](#), which cites ISO 22301:2012.

## Why is BCP important?

BCP can help an organization during an emergency or disaster to:

- Minimize liability.
- Meet compliance, regulatory, and funding requirements.
- Protect patient safety by ensuring consistent access to care.
- Maintain the public image of your center and public trust in your providers.
- Maintain revenue by continuing to see patients and to bill for services rendered in a timely manner.

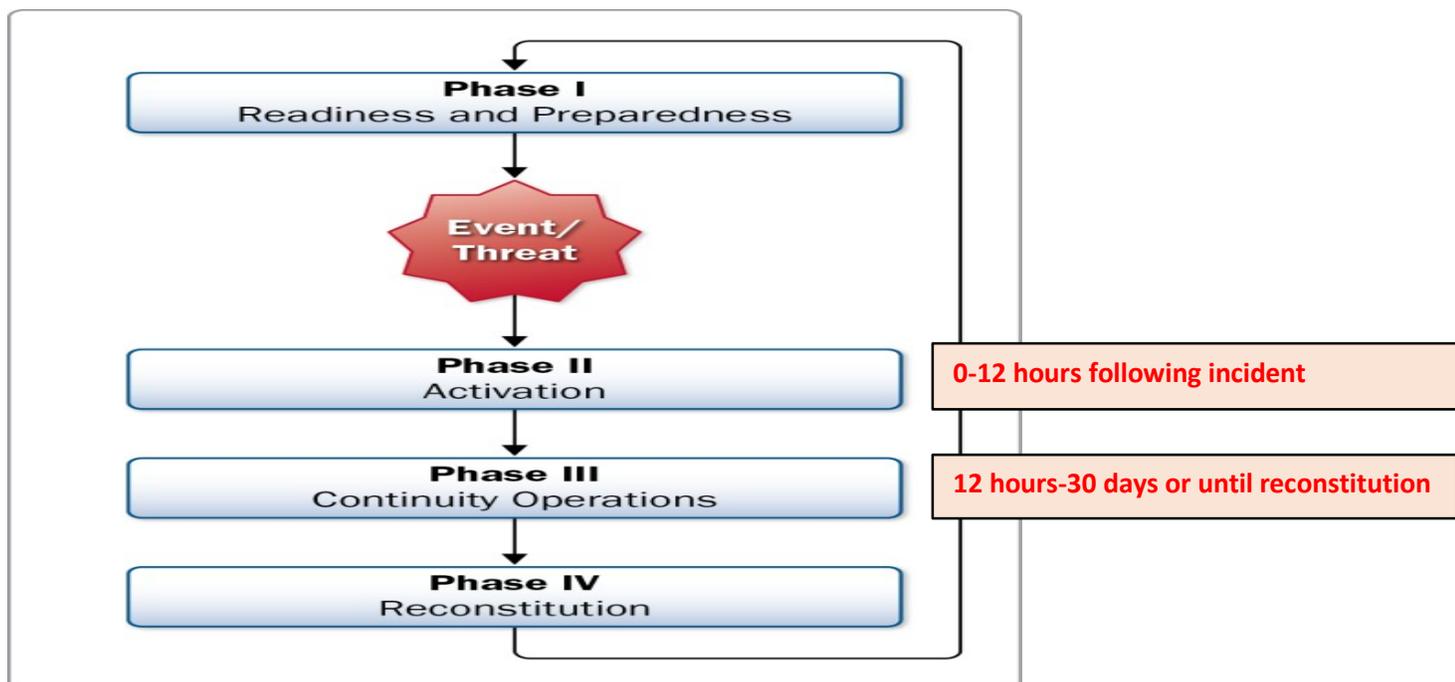
## What is the difference between BCP and Emergency Management?

Emergency Management (EM)	Business Continuity Planning (BCP)
<ul style="list-style-type: none"> <li>➤ Focused on the <b>response to the specific hazards</b> of an emergency or disaster.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Focused on <b>maintaining processes to support your organization's essential services</b> during an emergency or disaster, as well as those that support restoration of normal operations as quickly as possible.</li> <li>➤ Part of the Emergency Operations Plan or maintained separately.</li> </ul>

## What are the key aspects of BCP?

1. **Create a planning team.** It is important to have representation from across the organization to participate in BCP because executive level support is needed, as well as subject matter expertise to inform the protocols and processes that are essential to maintaining operations. In addition to executive level staff, ensure Finance is included, as are representatives from the emergency management team, information technology (IT), clinical services, and administration teams.
2. **Perform a risk assessment.** Identify potential hazards, such as through the conduct of a Hazard Vulnerability Analysis (HVA), that may impact your organization’s ability to deliver patient care.
3. **Identify and prioritize essential services.** A critical step in BCP is identifying the essential services each department/area of your organization needs to maintain during an emergency or disaster, and the supporting processes, applications, interdependencies, etc. that need to be maintained to support these essential services. As part of this process, your organization will assess the impact that disruption to these essential services will have on its ability to continue health care delivery during an incident.
4. **Document response and recovery actions in a plan.** Having a written plan ensures that everyone in the organization is working from the same set of protocols during continuity operations.
5. **Distribute the plan and train staff in their roles.** The plan is only useful if staff are familiar with it, and understand their roles and responsibilities under the plan.
6. **Exercise the plan and modify it accordingly.** Training and exercising should be conducted in a continuous cycle to maintain knowledge of the plan among organization staff. Ongoing, necessary improvements to the plan from lessons learned should be made to ensure that it will support maintenance of essential services during an emergency or disaster.

## What are the 4 phases of BCP implementation?



### Identification of Essential Services Form

Name of Organization:
Department/Area:
Person Completing This Form:
Date:

**Instructions:**

- 1) List the top 5-10 essential services (i.e., those that must continue with little to no interruption following an emergency or disaster) for your department/functional area. See list of possible services on page 3 that may be adapted based on services your organization provides.
- 2) Provide a brief description of the service. List critical staff, vendors, and services by name.
- 3) Describe how the loss of service would impact business operations, financial stability of the organization, and patient safety.

<b>(1) Essential Service</b>	<b>(2) Brief Description of Service</b>	<b>(3) Describe Impact if Service was Lost</b>



*The following is a list of possible essential services for your organization. It is a list of ideas for consideration, and not all services that your organization offers and may consider to be “essential” are included. Items on this list are not in any particular order and should be adapted based on the services your organization provides and deems to be essential during emergencies or disasters.*

- Patient registration
- Patient encounters (may wish to define by visit type, e.g., adult visit; pediatric visit; etc.)
- Medicaid/Medicare billing
- Private insurance billing
- Administrative support
- Transportation services for patients
- Payroll
- Onsite laboratory work
- Onsite diagnostic testing other than laboratory work (e.g., X-rays)
- Referrals
- Prescription refills (onsite and/or electronically)
- Vendor payments
- Maintenance of phone and other telecommunications systems (and backups)
- Maintenance of operational status of fire alarms/HVAC/utilities
- Triage
- Substance abuse services
- Maintenance of Electronic Medical Records system (note: this may be considered a “supporting function” for a number of essential services, and not an essential service on its own)

### Prioritization of Essential Services Form

<b>Name of Organization:</b>
<b>Department/Area:</b>
<b>Person Completing This Form:</b>
<b>Date:</b>

**Instructions:**

- 1) Carry over the essential services identified from the *Identification of Essential Services Form*.
- 2a/2b) Record the Recovery Time Objective (RTO)<sup>1</sup> and Recovery Point Objective (RPO)<sup>2</sup>, if applicable, for each essential service.
- 3) Identify supporting/interdependent processes; functions; IT infrastructure and applications; documentation/records; and personnel, for each essential service.
- 4) Assign each essential service to a prioritization tier for restoration of service to normal operating conditions using the following scale<sup>3</sup>:

Tier 1	RTO <4 hours
Tier 2	RTO 4-24 hours
Tier 3	RTO 24-72 hours
Tier 4	RTO 3-7 days
Tier 5	RTO 8-30 days

(1) Essential Service	(2A) RTO	(2B) RPO (if applicable)	(3) Supporting Processes, Infrastructure, Applications, Interdependencies, etc.	(4) Priority Tier



## PCEPN Business Continuity Planning Worksheets

**Purpose:** These worksheets are to be used to support development of your organization's business continuity plan.

**Instructions:** Use the questions for each section to guide discussion and planning with your Business Continuity Planning Team. Fill in sections/questions as applicable. Add questions and additional information, as needed based on your organization's essential services (i.e., those services that must continue with little or no business interruption) and supporting processes.

Note: The template used is based on [FEM A's Continuity Plan Template and Instructions for Non-Federal Governments](#). The concepts contained in these worksheets are applicable to your plans even if your organization chooses to follow a different plan outline.

This publication was supported by Cooperative Agreement Number 5U90TP000546-04 from the Centers for Disease Control and Prevention and/or Assistant Secretary for Preparedness and Response. Its contents are solely the responsibility of the authors and do not necessarily represent the official views of the Centers for Disease Control and Prevention and/or the Assistant Secretary for Preparedness and Response.

## Contents

<b>I. Promulgation Statement; Record of Review; Record of Changes; and Record of Distribution</b> .....	1
<b>II. Purpose, Scope, Situation, and Assumptions</b> .....	2
<b>III. Concept of Operations</b> .....	5
<b>IV. Organization and Assignment of Responsibilities</b> .....	19
<b>V. Direction, Control, and Coordination</b> .....	20
<b>VI. Disaster Intelligence</b> .....	21
<b>VII. Communications</b> .....	22
<b>VIII. Budgeting and Acquisition of Resources</b> .....	23
<b>IX. Multi-Year Strategy and Program Management Plan</b> .....	26
<b>X. Plan Development and Maintenance</b> .....	27
<b>XI. Authorities and References</b> .....	28





## II. Purpose, Scope, Situation, and Assumptions

These sections describe why the organization is developing a continuity plan; the plan’s applicability; the planning environment (including risk assessment information); and the assumptions upon which the plan is based. This section is utilized to describe the plan’s objectives, and security/privacy.

<b>Describe the purpose and objectives of your organization’s Business Continuity Plan.</b>

<b>Describe to whom and to what situations the plan applies.</b>
<i>Example:</i> This plan applies to the staff of [NAME OF ORGANIZATION], located at [INSERT ADDRESS(ES)]. This plan will be executed following an emergency or disaster that disrupts normal business functions of [NAME OF ORGANIZATION] to maintain essential services for the patients we serve, and minimize the negative impacts of the emergency or disaster on our organization.

<b>Describe why the organization needs a Business Continuity Plan. Include relevant risk assessment information, such as from the Hazard Vulnerability Analysis (HVA), and why services must continue.</b>

<b>Describe key assumptions that support the plan (e.g., what absolutely must continue; what may be suspended, etc.)</b>

<b>Describe the security/privacy level of the plan. (e.g., “For Official Use Only;” “Not for Distribution.”)</b>

### III. Concept of Operations

This section should explain how the organization will implement its continuity plan, and specifically, how it will address each continuity element. This section is separated into the four phases of business continuity implementation: Readiness and Preparedness; Activation; Continuity Operations; and Reconstitution.

#### **PHASE 1: Readiness and Preparedness**

This section addresses the readiness and preparedness activities your organization will undertake to ensure personnel can continue essential functions after an emergency or disaster.

<b>Describe how essential services and supporting processes are determined and documented, as well as how often they are reassessed. Include in appendices, and reference here, the list of essential services and their priority order for restoration during an emergency or disaster.</b>

<b>Has your organization identified an alternate (continuity) facility to which all operations may be relocated, as necessary? If so, indicate where this facility is located, and if a Memoranda of Agreement (MOAs) related to its use during an emergency or disaster are required, and the status of such MOAs.</b>

<b>In coordination with Finance, note cost centers defined for tracking and paying any continuity planning related costs, as well as continuity of operations costs.</b>

<p><b>Describe any equipment or supplies that are/will be purchased in advance of an incident to support continuation of essential services. Describe the status of any related MOAs. Describe stockpiles already on hand. Cross-reference <i>Budgeting and Acquisition</i> section for additional finance and administrative details.</b></p>

<p><b>Generally describe the content and locations for any “Go Kits” prepared for staff in advance of an event that they may either use to relocate to an alternate facility, or to perform their continuity duties at the primary facility. Attach a detailed “Go Kit” description/list to the plan, if applicable. (<i>“Go Kits” should include copies of important documents and information, as well as supplies and software needed to conduct operations, e.g., employee contact information; insurance certificates; payroll information; vendor information and supply lists; passwords for information technology systems; directions for communicating with staff and patients; office supplies; your Business Continuity Plan, etc.</i>)</b></p>

<p><b>List and describe the status of any protocols developed/requiring development in support of continuity operations. Indicate who is responsible for each of them.</b></p>

### III. Concept of Operations (cont'd)

#### **PHASE 2: Activation (0-12 hours)**

This section explains the activation process from the primary operating facility and provides a process or methodology for continuing operational capability at the primary facility, or attaining it at the continuity facility (ies) if applicable, with minimal disruption to operations within 12 hours of plan activation. This section also addresses procedures and guidance for personnel who will not relocate to a continuity facility.

<b>Describe the processes for the suspension of non-essential services (i.e., those that do not have to continue during an emergency or disaster) and the initiation of continuity protocols.</b>

<b>Describe how and when staff and patients will be notified of changes in service and schedules.</b>

**Describe how continuity supplies, equipment, additional staff, and/or transportation assets will be mobilized and made ready for continuity operations. Indicate who is responsible for mobilizing these items.**


**If applicable, describe the process for activating Memoranda of Agreement (MOAs) related to continuity operations, including those for staff, equipment, supplies, and/or transportation assets.**


**If applicable, describe the protocol for testing and starting up emergency power supplies and reaching out to utility service providers regarding any outages.**


<b>If applicable, describe the process and protocols related to moving staff and operations to an alternate facility, and preparing that facility for continuity operations.</b>

### III. Concept of Operations (cont'd)

**PHASE 3: Continuity Operations (12-30 hours, or until reconstitution occurs)**

This section describes operational procedures for the continuation of essential services. This may include arrival procedures at an alternate facility.

As applicable to each essential service, describe workarounds that must be implemented for supporting processes affected by the emergency or disaster, such as manual completion of medical record information while information technology (IT) systems are down.

If applicable, describe the protocols that must be implemented by staff after they arrive at the continuity facility to begin continuity operations.

**Essential Service 1:** \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

Essential Service 2: \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

Essential Service 3: \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

Essential Service 4: \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

Essential Service 5: \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

Essential Service 6: \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

Essential Service 7: \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

Essential Service 8: \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

Essential Service 9: \_\_\_\_\_

Describe operational procedures for the continuation of this essential service.

**Essential Service 10:** \_\_\_\_\_

<b>Describe operational procedures for the continuation of this essential service.</b>

<b>Describe protocols for maintaining the cold chain of vaccines, lab reagents, etc., as necessary.</b>

### III. Concept of Operations (cont'd)

#### **PHA SE 4: Reconstitution Operations**

This section describes plans to return to normal operations once organization heads or their successors determine that reconstitution operations for resuming normal business operations can be initiated.

<b>Describe the conditions and protocols for resuming normal operations and reinstating suspended services. Include who makes decisions regarding resumption of normal operations.</b>

<b>Describe the protocol for recreating any work lost in progress resulting from IT systems going down. Include who is responsible for recreation of work.</b>

**Describe the protocol for ensuring that any data collected manually or through an alternate IT set-up/server is moved to day-to-day servers/databases, etc. Include quality assurance protocols, and who is responsible for moving data.**


**Describe how staff will transition back to day-to-day roles.**


**Describe protocols for notifying staff and the public of resumption of normal operations.**


<b>Describe protocols for returning any equipment, supplies, staff, and/or services, as applicable, upon resumption of normal operations.</b>





## VI. Disaster Intelligence

This section describes the required critical or essential information common to all continuity events. In general terms, it should identify the type of information needed, where it will come from, who will use it, how it will be shared, the format it will be provided in, and when (time) the information will be needed.

Information to be Collected During Continuity Events	Where Information Will Come From	Who Needs Information	How Information Will Be Shared	The Format In Which Information Will Be Provided	When the Information Will Be Needed



## VIII. Budgeting and Acquisition of Resources

The Budgeting and Acquisition section aligns with the Administration, Finance, and Logistics section of FEMA’s Comprehensive Guide 101 (CPG-101). It identifies the people, communications, facilities, infrastructure, and transportation requirements necessary to the successful implementation and management of your organization’s continuity program. This section also describes how funding is to be identified and provided, as well as specific budgetary guidance and requirements for all levels of the organization.

List any supplies and/or equipment needed to implement your continuity plans.	Indicate primary vs. continuity facility, as applicable.	Note for each item if it needs to be purchased pre-event or if you can obtain it just-in-time, and what the estimated cost is.	List any applicable Memoranda of Agreement (MOAs) for each item.

Indicate what transportation assets, if any, are needed to implement your continuity plans.	Note for each item if it needs to be pre-arranged or if you can arrange transportation just-in-time, and what the estimated cost is.	List any applicable Memoranda of Agreement (MOAs) for each asset.

Describe circumstances that might require your organization to acquire additional staff.	Indicate how the organization will obtain additional staff, as applicable (e.g., transfer staff across network facilities; obtain volunteers). Include estimated costs, as applicable.	List any Memoranda of Agreement (MOAs) that may be needed.

Describe circumstances in which your organization will transfer staff to other work locations.	Indicate who will be transferred and where they will be transferred.	List any Memoranda of Agreement (MOAs) that may be needed.

Describe how continuity-related costs will be tracked pre-event?	Indicate who is responsible for tracking pre-event costs.	Describe how continuity-related costs will be tracked during/post-event?	Indicate who is responsible for tracking during/post-event costs.

Describe how just-in-time (JIT) costs will be paid.

**What insurance does the organization carry relevant to continuity of operations? Is there additional insurance that needs to be purchased?**


**Describe any plans to secure loans to cover just-in-time expenses. What expenses will these loans be used to cover? Include the source of the loans and how to obtain them.**


**Are protocols in place to ensure that staff are paid during continuity operations? If so, describe them.**




## X. Plan Development and Maintenance

This section identifies who is responsible for keeping the continuity plan document current, how often the plan will be reviewed and updated, and what the coordination process related to developing and maintaining the plan is.

Indicate the position title(s) of whomever is responsible for maintaining the organization's Business Continuity Plan.

Indicate how often the plan will be reviewed and updated; who (position titles) it will be reviewed by; and who (position title(s)) is responsible for updating it.

Briefly describe the overall coordination of plan development and maintenance (include internal and external partners, as applicable). Describe training and exercise plans in support of the continuity plan.

## XI. Authorities and References

The key authorities and references on which your organization’s continuity plan is based should be listed here.

List the key authorities on which your organization’s continuity plan is based.
HRSA Public Information Notice (PIN) 2007-15
Healthcare Preparedness Capabilities: National Guidance for Health System Preparedness (ASPR). Capability 1, Function 3; and Capability 2, Function 2.
Health Insurance Portability and Accountability Act of 1996 (HIPAA; Pub.L. 104–191, 110 Stat. 1936, enacted August 21, 1996). Sections 164.308; 164.310; and 164.312.

List the key references used to inform your organization’s continuity plan.

## Resources Consulted for This Workshop and/or Recommended for Additional Information

- Business Continuity Plan Template (Los Angeles County Emergency Medical Services Agency). [http://www.calhospitalprepare.org/sites/main/files/file\\_attachments/clinicstemplatelac.docx](http://www.calhospitalprepare.org/sites/main/files/file_attachments/clinicstemplatelac.docx)
- Business Impact Analysis (ISACA). [http://www.isaca.org/groups/professional-english/business-continuity-disaster-recovery-planning/group\\_documents/businessimpactanalysisblank.doc](http://www.isaca.org/groups/professional-english/business-continuity-disaster-recovery-planning/group_documents/businessimpactanalysisblank.doc)
- California Hospital Association-Continuity Planning Website. (Multiple resources available.) <http://www.calhospitalprepare.org/continuity-planning>
- Continuity of Operations Plan Guidance Document (Kansas Department of Health and Environment). [http://www.kdheks.gov/cphp/download/HospitalCOOPGuidance\\_Document.doc](http://www.kdheks.gov/cphp/download/HospitalCOOPGuidance_Document.doc)
- Continuity of Operations Plan Template (Southeast Texas Regional Advisory Council). <http://www.setrac.org/go/doc/4207/1671227/>
- Continuity of Operations-What you Need to Know (FEMA video). <https://www.fema.gov/media-library/assets/videos/94388>
- Creating a Business Continuity Plan for your Health Center. (National Association of Community Health Centers and Primary Care Development Corporation.) <http://www.pcdc.org/assets/pdf/business-continuity-manual.pdf>
- FEMA Continuity Guidance Circular 1, Continuity Guidance for Non-Federal Agencies (CGC 1). <http://www.fema.gov/media-library-data/1386609058803-b084a7230663249ab1d6da4b6472e691/CGC-1-Signed-July-2013.pdf>
- FEMA Continuity Guidance Circular 2, Continuity Guidance for Non-Federal Entities: Mission Essential Functions Guidance Process. <https://www.fema.gov/media-library-data/1386609058826-b084a7230663249ab1d6da4b6472e691/Continuity-Guidance-Circular2.pdf>
- FEMA Continuity Plan Template and Instructions for Non-Federal Governments. (2013). <http://www.fema.gov/media-library-data/1389194640607-1a5f9a6d6557846f6e5924eea089f798/N-on-Federal-Continuity-Plan-Template-and-Instructions.pdf>

- Healthcare COOP and Recovery Planning: Concepts, Principles, Templates, and Resources (ASPR). <http://www.phe.gov/Preparedness/planning/hpp/reports/Documents/hc-coop2-recovery.pdf>
- Healthcare Preparedness Capabilities: National Guidance for Health System Preparedness (ASPR). <http://www.phe.gov/preparedness/planning/hpp/reports/documents/capabilities.pdf>
- HIPAA requirements that address BCP. <http://www.hipaatraining.net/hipaa-compliance/hipaa-business-continuity-disaster-plan.htm>
- HRSA PIN 2007-15. <http://bphc.hrsa.gov/about/pdf/pin200715.pdf>
- ISO 22301 2012 Business Continuity Management Definitions. <http://www.iso.org/iso/home/store/catalogueetc/cataloguedetail.htm?csnumber=50038>
- The Joint Commission Emergency Management, and Environment of Care Standards for Ambulatory Programs. (available for purchase) <http://www.jointcommission.org/standardsinformation/edition.aspx>
- New York State Department of Health (NYSDOH) Metropolitan Area Regional Office (MARO) Business Continuity Planning training slides. Available upon request from PCEPN.
- NFPA 1600 Standard on Disaster/Emergency Management and Business Continuity Programs. <http://www.nfpa.org/codes-and-standards/document-information-pages?mode=code&code=1600>
- Primary Care Center Business Continuity Planning Template (PCEPN). Available upon request from PCEPN.
- Ready New York for Business (New York City Emergency Management). [http://www.nyc.gov/html/oem/downloads/pdf/Business\\_Guide\\_Final.pdf](http://www.nyc.gov/html/oem/downloads/pdf/Business_Guide_Final.pdf)
- A Stronger, More Resilient New York, Chapter 8: Healthcare. <http://www.nyc.gov/html/sirr/download s/pdf/finalreport/Ch8HealthcareFINALsingles.pdf>