Business Continuity Plan

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# Section I: General

The function of the Business Continuity Plan (BCP) is to assist impacted areas with ensuring that critical business functions are maintained, restored or augmented to meet the designated recovery requirements, also referred to as the Recovery Time Objective (RTO). The BCP details recovery strategies outlined in the areas’ business continuity and business resumption plans.

With the command/HICS structure, the Business Continuity Operations Branch will lead BCP activities to:

1. Facilitate the acquisition of and access to essential recovery resources, including business records (e.g., patient medical records, purchasing contracts).
2. Support the Infrastructure and Security Branches with needed movement or relocation to alternate business operation sites.
3. Coordinate with the Logistics Section Communications Unit Leader, IT/IS Unit Leader and the impacted area to restore business functions and review technology requirements.
4. Assist other branches and impacted areas with the restoring and resuming of normal operations.

In the event of a crisis, <insert organization> will make every effort to continue operations. This plan addresses organization-wide considerations for operations, finance, staffing, supplies, vital records and departmental specific needs/devolution of essential functions to continue operations. To ensure the continuity of essential services during an event that may interrupt the delivery of normal operations the following actions will be taken:

* Identify critical operation points, functions or skills necessary for continuity of operations (e.g., management staff; specific levels of expertise, training or experience; recording or documentation requirements; health and safety concerns), which may be necessary for business to continue and for staff to provide patient care services.
* Identify the need for additional resources or support to maintain essential services/functions.
* Plan for service reduction based on need, critical nature of function as a support for organization or local population and other factors.
* Written notification to employees regarding business continuity strategies for the duration of the event and compensation provisions, if feasible.
* Activation of continuity and emergency operations procedures as determined by the individual authorized to operate <insert organization> facilities.

# Section II: Overview

This plan defines the mission critical services and processes and procedures to ensure they can be continued and/or recovered when normal operations are not viable.

This BCP was developed in conjunction with the <insert organization> emergency planning effort. In developing this plan and all associated procedures, checklists and forms, the continuity between the <insert organization> and the associated departments can be ensured. Note that in order for the plan to be effective, exercises and trainings of this plan must be carried out by the Pharmacy department on an annual basis. Additionally, updates to the plan and all associated checklists, forms and procedures will be made on an annual basis in concert with the Office of Emergency Preparedness.

For purposes of this plan and all associated procedures, checklists and forms, an event is defined as any planned or unplanned situation that disrupts the normal operations of the department.

This plan describes the procedures for continuity or, if needed, contingencies for the recovery of services at an alternate location. Strategies for continuing operations when key services are unavailable are detailed in each departmental business continuity plan.

# Section III: Activation

In an event that disrupts normal operations and impacts essential operations of the Pharmacy department, measures are to be taken to prepare and pre-position resources to ensure continuity of mission critical services and processes. An algorithm of considerations and decisions are illustrated below.

The Hospital Command Center (HCC) responds to events that can impact the ability of the Medical Center to perform its normal daily functions. The HCC is comprised of personnel with the knowledge and authority to provide support Business Continuity, Emergency Response and Recovery activities.

<insert activation algorithm>

## Delegation of Authority and Orders of Succession

All persons listed will have full, unlimited authority to operate <insert organization> facilities to the fullest extent possible until such person is relieved by the next highest-ranking individual. This list is in descending order of succession. If the event is triggered after normal operating hours, or on a weekend or holiday, the Administrator-On-Call number (xxx-xxxx) should be called first and that person will follow the notification and escalation procedures as well as incident command protocols as described in the EOP. Delegation to successors other than the CEO/Administrator extending beyond seven days will need approval by [insert authorizing organization/agency].

## Contact List

| First Name | Last Name | Phone Number | Comments/Additional Phone Number |
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## Delegation of Authority Form

The person named below will have full, unlimited authority to operate [INSERT ORG NAME] to the fullest extent possible until such person is relieved by the next highest ranking officer. Delegation to successors other than CEO/Administrator extending beyond seven days will need approval by [INSERT ORG/AGENCY NAME]

Name and Title of Person Delegated Authority:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date and Event Triggering Delegation:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Authority is (circle one): Unlimited – No Restrictions Limited – list limitations:

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Day/Date of Delegation Termination:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date Authority Extended:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name and Title Approving Extension:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature of Extension Authorization:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name and Title of Person Assuming Authority:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date of Authority Assumption:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# Departmental Plans and Devolution of Essential Functions

Each department has developed a plan that identifies their essential functions, applications, vital records, equipment and supplies. The devolution of essential functions identifies how the departments will conduct essential operations during crisis events that may adversely impact their department. This information is listed in the Strategy for Recovery and Interruption Impact section of their plan.

## Mission Critical Services and Processes

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| **Tier** | **Criticality** |  |  | |
| Tier 0 | Immediately needed, presents life threatening or catastrophic impact if interrupted | | |  | |
| Tier 1 | Needed in less than 4 hrs or it may present threat to life safety if downtime extends beyond | | | |
| Tier 2 | Needed in same shift or < 12 hrs or likely to impact operations and/or patient satisfaction | | | |
| Tier 3 | Minimal impact or risk, needed within 1 to 3 days |  | |  | |
| Tier 4 | Need in long term, beyond 3 days |  | |  | |
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| **Department** | **Mission Critical Services and Processes** |  |  |
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| **Department** | **Essential Function** |  |  |
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## Staffing

Following an event such that may impact staffing levels, Human Resources with the support of individual departments will consider the minimum staffing needed to maintain essential services is documented in departmental plans. Staffing considerations include:

* Evaluation of current staffing levels and resource deployment.
* Notification of human resources, managers, union representatives and other key personnel as to status and plan implementation.
* Notification of employees regarding plan activation and process.
* Implementation of alternative staff resource options.
* Evaluation of immediate and ongoing staff needs based on existing and predicted levels of human resources available.
* Identification of contractors or other staff options that may alleviate problems resulting from staff loss.
* Identification of work options available through “telecommuting” or other off-site possibilities.
* Assessment of flexible leave options that would allow employees to address family needs while continuing to support the employing organization through a flexible work plan where feasible.
* Assessment of union issues surrounding overtime issues and disaster support/sharing of responsibilities among workers.
* Evaluation of potential health and safety issues that may arise through diversion of staff to new job roles and loss of critical staff in various operational positions.
* Liability assessment by general counsel.

Staffing levels will be managed by leadership/command on site and delegated to department heads as needed every 4 hours. In the preparation for the coverage needed in the event of a reduction in staffing or insufficient staff resources due to demand, advanced credentialing of physicians, nurses and other clinical professionals from non-essential disciplines to supplement the critical departments will be performed if needed. Staffing may be supplemented from additional sources such as:

* Physician groups
* Retired MD living in community
* Schools of Nursing: student contract agreements
* Listing Retired Nurses
* School nurses in community
* Healthcare ED alumni nurses
* Cross- raining of floor med- surg nursing staff
* Pre-credentialing of healthcare nursing (contract personnel)
* Identify of alternate staff options as needed (e.g. contractors or other staff options that may alleviate problems resulting from staff loss).
* Identify alternate work options available through “telecommuting” or other off-site possibilities as determined in departmental BCPs.
* Managers to refer to department plans to identify employees that can work remotely.
* Collaborate with IS for remote access and identify applications needed.
* Provide written notifications and updates to employees including overtime issues and disaster support/sharing of responsibilities among workers.
* Meet with union representatives to discuss relevant issues:
  + Language for asking staff availability, offering incentive programs, utilizing external agencies, review four-hour mandatory rule.
* Establish Labor Pool – Plan to re-deploy staff as needed, cross training of staff in specific areas.
* Assess extra resources within healthcare and within health system
* Offering support to employees, Care Child Center and arrangements to stay over if needed.
* Work with housekeeping to set up space for over night arrangements.
* Develop plan for food services to accommodate staff staying overnight and working extra shifts.

**Additional considerations in an evacuation and during recovery**

*Be responsible for the “human” aspects of the disaster including post-event counseling, next of kin notification; answer questions related to compensation, benefits and travel policy.*

* Determine what “human” issues need attention.
* Determine whether the psychological needs of affected staff are being addressed. Coordinate Critical Incident Stress Debriefing (CISD) sessions as needed.
* Recommend other activities that may be needed (memorial services, etc.) to the Incident Commander.
* Assist in creating updates to the Emergency Hotline.
* Continue working with communications in creating employee communications.
* Keep the Incident Commander informed of significant issues affecting human resources and payroll.
* Provide current roster of personnel and emergency contact information for next of kin notification.
* Track, record and report all on-duty time for personnel who are working during the event. (see Finance)
* Maintain a file of injuries and illnesses associated with the event that includes results of investigations.
  + Notify state OSHA of any fatalities or serious injuries on the job.
  + Maintain a chronological log of injuries and illnesses reported during the event.
  + Coordinate the investigation of all injury claims as soon as possible.
  + Coordinate the preparation of appropriate forms for all verifiable injury and damage claims, and forward them to insurers within reasonable time frames.
* Notify insurers and third party administrators as needed.
* Place service providers on alert.
* Notify workers’ compensation carrier of injuries.

**After the Event**

* Refer or make available counseling services for employees and their families.
* Provide necessary recovery time (time-off) for staff assisting with recovery efforts.

## Vital Records

Personnel will be deployed during an emergency to ensure the protection and ready availability of electronic and hardcopy documents, references, records, and information systems needed to support essential functions under the full spectrum of emergencies. Personnel and locations of vital records have been identified before an emergency in order to have full access to use records and systems to conduct essential functions during a crisis event. In addition to the departmental records identified, the following records are deemed critical to <insert organization>.

* Emergency Operations and Healthcare Continuity Plan
* IT Disaster Recovery Plan
* Essential Business Records
  + contracting and acquisition files – scanning
  + official personnel files – hard copy
  + payroll records
  + insurance records
  + Per HR – part of the payroll and insurance records are on the computer system but not all.
  + property management and inventory records
* Corporate Records:
* Incorporation documents – scanned PDF
* By-laws – scanned PDF
* Tax-exemption documents (e.g. application for tax exemption, IRS Form 1023; IRS determination letter; and related documents)
* Board meeting documents including agendas, minutes, and related documents – scanned PDF – current information
* Conflict of Interest and Nondisclosure statements – scanned PDF
* Correspondence with legal counsel and/or accountants not otherwise listed – emails to CEO; current audit reports are available through accountants; old audit reports are permanent records
* Financial documents, including:
  + Audit and management letters
  + Audit work papers
  + Equipment files and maintenance agreements
  + Bank statements, canceled checks, check registers, investment statements and related documents going back seven years – 3 years in Jesse’s office with balance in storage
* Donor and Fund Records
  + Fund files including fund agreements and fund statements
  + Gift documentation
  + Grant documentation
* State charitable registration documents
* Lease Agreements
* Deeds, mortgages, notes, security agreements for real estate held for sale- Administration will need to scan into PDF
* Personnel and payroll records including employment applications and employee manual
* Insurance forms with policy numbers – certificates scanned PDF
* Signed contracts with vendors
* Commercial software licenses, including: - Contact I.T. Department
  + Copies of installation CDs
  + Product keys
  + Serial numbers
  + End User License Agreements

## Finance

Business continuity plans should address the considerations with respect to the continuation of essential services such as payroll, the insurance claims process for both losses and emergency protocols with payers and federal re-imbursement procedures following declared disasters.

During a service interruption event or emergency the Incident Commander should appoint a Finance Section Chief. The Finance Section Chief should understand patient intake, insurance, coding and reimbursement.

Essential functions, at a minimum for finance should include:

* Payroll processing
* Financial recording and reporting
* Procurement
* Billing, Payment and Reimbursement
* Claims Processing

### Vital Records – Finance

* Unprocessed gifts and checks
* A box of check stock
* A box of deposit slips and stamp
* Payroll information and personnel files
* Insurance documentation
* Last month’s bank statements
* Policy and procedure manual

#### Payroll Processing

* Modify process for approving time sheets in the event a supervisor is unavailable.
* Make provisions for alternate access to payroll systems in the event primary staff are unavailable.
* Ensure that payroll will be conducted from an alternate/remote site.
* Arrange for optional cash salary payments if needed.
* Distribute paper checks if needed. Document the process on how this will done including who has authority to write checks, location of distribution, who will distribute (manager vs. finance dept) etc.

### Financial Recording and Reporting

* Prepare and maintain cumulative income and expense report during the event.
* Set-up zero dollar cost centers (2 or more) to capture disaster related charges. Cost codes within the cost center should include labor, supplies, pharmaceuticals, equipment, etc.
* Retain all invoices, time sheets, etc. to ensure all costs are captured and attributable to the event.
* Track, record and report all on-duty time for personnel who are working during the event.
  + Establish and maintain documentation of all payroll activities.
  + Ensure records are accurate and complete. All staff must be keeping time sheets (exempt or not) as their time may be reimbursable by insurance.
  + Provide instructions to all employees to ensure time sheets and travel expense claims are completed properly.
  + Ensure that time records, travel expense claims, and other related information are prepared and submitted to payroll.
* Develop financial reports and use forms that are easy to understand for use by staff and board members. (see forms)
* Prepare and maintain an expense report for the Incident Commander. The report should include cumulative analyses and total expenditures for the event.
* Organize and prepare records for audit.

### Procurement

**Note: Establish emergency procurement procedures before the emergency that comply with state, federal and any applicable local rules.  Having a policy in place ahead of time will make it much easier to justify those costs if reimbursement is needed as a result of the disaster.**

* Ensure access to funding and necessary capital to meet operating and recovery

needs

* Determine operating costs on a daily, weekly and monthly basis for the prior 12-month period. Use data as a base to determine revenue that must be available for continuity of operations.
* Tabulate cash-on-hand. Determine how long operations can be sustained based on existing financial resources.
* Identify all current sources of income and consider how they may be affected (e.g., if medical record documentation is compromised and claims are submitted with less information than required by payers, reimbursement may be reduced).
* Project additional cash needs in relation to expected claims reimbursements.
* Monitor liquidity of assets based on projected expenses during the recovery.
* Work with Finance and/or Investment committee to determine the allocation of resources during recovery.
* Establish purchase orders with secondary vendors in the event supplies from primary vendors become limited or depleted.
* Prepare and sign emergency contracts as needed.
* Ensure that all contracts identify the scope of work and specific site locations. (note for FEMA reimbursement: 6 months from date of declaration for debris removal and emergency protective measures and 18 months for permanent work)
* Coordinate with Incident Commander on all expenses exceeding pre-established limits.
* Establish and maintain documentation of all purchasing activities.
* Establish and manage disaster funds and general ledger accounts.
* Establish and maintain all necessary documentation for recovery process.
* Track costs for use of equipment purchased and leased during the event.

### **Billing, Payment and Reimbursement**

Collect and maintain documentation on all disaster information for claims, payment and reimbursement from private insurance carriers, FEMA, SBA and other agencies.

## Property Damage Documentation

* invoices
* purchase orders
* repair quotations
* time and material contracts with expenditures
* labor time sheets with corresponding payroll journals
* supply vouchers or requisitions
* inventory quantities with pricing

## Business Interruption Documentation

* reconstruction schedule
* past experience of business actual experience during the
* period of indemnity
* revenue forecasts
* additional expenses incurred to reduce the period of reconstruction
* purchase journals
* payroll journals
* general ledger
* profit and loss statements
* inventory records, quantities and values

**Claims**

* Investigation of injuries and property and equipment damage claims arising out of the event.
* Notify insurers and third party administrators.
* Prepare required documentation (insurance carriers and government agencies) as necessary to recover all allowable disaster response and recovery costs.
* Provide information regarding insurance coverage as necessary.
* Track the total inventory of equipment, supplies and other items that have been lost, impacted or damaged.
* Maintain a chronological log of property damage reported during the event.
* Coordinate the preparation of appropriate forms for damage claims and forward them to the insurers within the required time frame.

**Payers**

* Review payer contracts to see if they include clauses that address utilization management and claims processing during emergencies.
* Address suspension of contractual obligations or establish memorandums of agreement with health plan providers regarding suspension of (or modifications to) the following processes to reduce interruptions in patient care:
  + Prior authorization
  + Precertification
  + Concurrent review
  + Referrals
  + Notice of admission
  + Claims submission deadlines
  + Retrospective medical necessity reviews
  + Provision of emergency department records
  + Medical record documentation
* Determine whether payers have modified requirements related to medical record documentation after a state of emergency has been declared.
* Determine whether specific coding will be required by commercial payers to reflect care that is provided at an alternate care site. Determine which code must be used.
* Prioritize claim submissions. Consider submitting high-dollar claims first, or those that do not require extensive documentation.

### FEMA Reimbursement

* Determine eligibility for compensation through state or federal funds due to financial losses attributed to a declared disaster or public health emergency.

FEMA may cover:

* Emergency medical care
* Temporary medical facilities
* Sheltering
* Storage and internment of unidentified human remains
* Mass mortuary services
* Overtime pay for regular employees
* Regular and overtime pay for extra hires

FEMA may not cover:

* Inpatient care
* Follow-up treatment
* Costs associated with loss of revenue
* Increased administrative and operational costs due to increased patient load
* Disaster-related recovery
* Submit Request for Public Assistance (RPA) within 30 days of the date that the affected area is designated a disaster area in a Presidential Disaster Declaration.
* Kickoff Meeting will be scheduled within one week of FEMA’s receipt of the Request for Public Assistance.
* Damaged facilities and emergency work must be identified and reported to FEMA within 60 days of the Kickoff Meeting.

Completing Work:

* Time starts from the Date of the Declaration.
* Time frames may be adjusted depending on the type and extent of the disaster. Extension of times may be requested.

**Forms (use HICS Forms in EOP)**

* Claims Report
* Claims Summary
* Procurement Summary
* Emergency Order Form
* Time Sheet