Washington Association for Community Health

Community Health Centers
Advancing Quality Care for All

Improving Business Continuity Planning At FQHCs

Webinar Training: 9am-12pm, September 23, 2020

BACKGROUND

The unprecedented effect of COVID-19 on health center operations has emphasized the importance of business continuity planning in emergency preparedness.

BSI EHS Services and Solutions will train health centers how to put together a risk assessment and business impact analysis and turn them into a business continuity plan. Afterwards attendees can meet with BSI during "office hours" to review their plans.

As a result of the session, participants will be able to:

○ Evaluate their health center's current business continuity plan

○ Identify areas for change

○ Begin developing an improved business continuity plan

Housekeeping

INTRODUCE YOURSELF | Type your name & health center in CHAT Box

Mute your microphone

????? | Type questions/comments in CHAT Box

Webinar slides, recording, handout & evaluations will be emailed

Attendees will be emailed an opportunity for "office hours" with BSI

Host:
Patricia Gepert
Health Access Coordinator

Presenter:
David Bernstein
Senior Consultant Manager

Washington
Association for
Community Health

bsi.

Improving Business Continuity Planning At FQHCs

David Bernstein, MPA, CBCP, CEM, CHEP, CHPCP

Senior Consultant

By Royal Charter

bsi.

Agenda

- Introduction to BCP

- Risk Assessment and Business Impact Analysis

- CMS and Business Continuity Planning

- Workshops

bsi

8

Introduction to Business Continuity Planning

9

Difference Between Emergency Management and Business Continuity

Emergency Management

Life Safety

  Incident Stabilization

    Property Preservation

- Directives come from Department of Homeland Security
- Based on national framework
- Regulated in various industries

Business Continuity

- Based on ability to:
  - Identify critical business functions
  - Re-engage or continue operations ASAP
- Born from IT Disaster Recovery practices
- Standards exist, but are generally driven by best practices (not regulations)

Similarities Between Emergency Management and Business Continuity

Emergency Management   **Business Continuity**

EVERYTHING ELSE

- Incident Response
- Crisis Communications
- Plan Development and Implementation
- Training
- Assessment through drills and exercises

What is a Business Continuity Plan (BCP)?

A comprehensive plan that ensures business objectives can continue to be met in the event of an incident or disruption.

Designed to enable an efficient response and support timely recovery of the business while minimizing impacts to employees, products or services to customers.

Famous thoughts on planning…
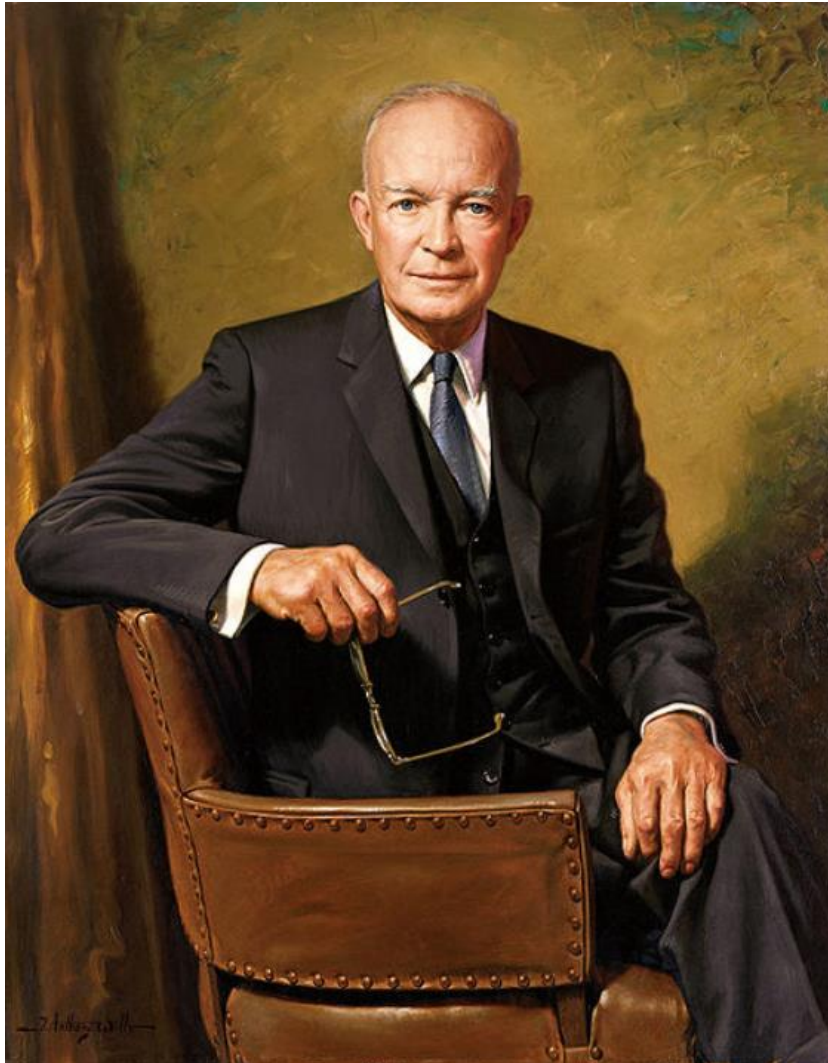
"The plan itself is worthless, but the planning process is invaluable"

Dwight D. Eisenhower

34th President of the United States
Supreme Commander Allied Forces
Western Europe WW2

bsi.

13

Business Continuity Planning: Getting Started

Start high-level

1 — **2** — **3**

Plan for the worst
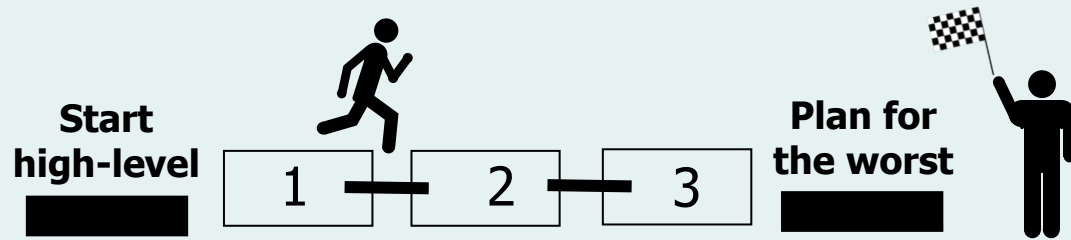
The process is stepwise and progressive

Consider all potential impacts to your business

Continuity Development Cycle
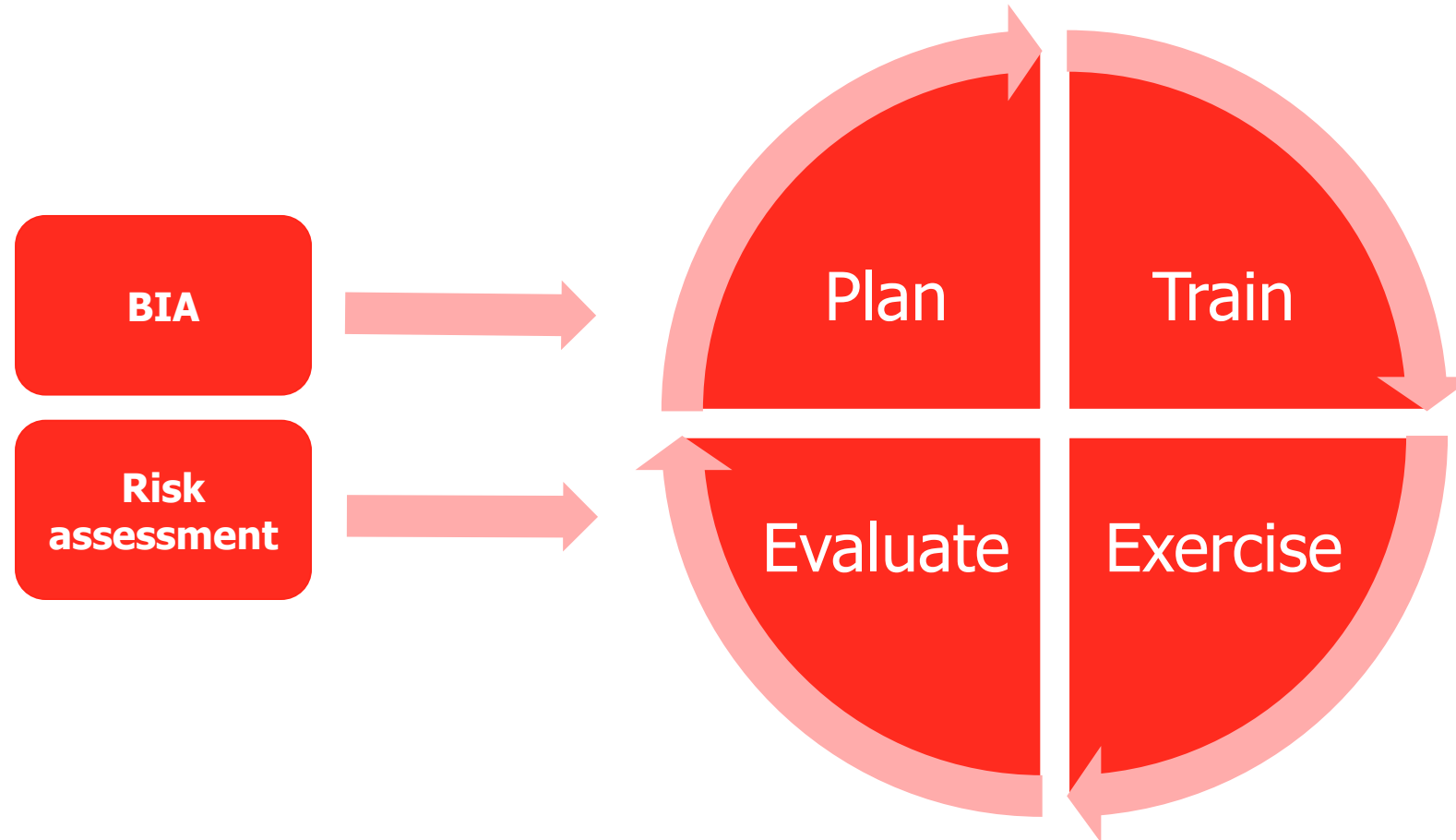
Planning Process: Things to Consider

One bite at a time...

BCP

- Forms and supplies
- Assumptions
- Drilling down
- Vital records
- Business process
- Equipment
- Financial impacts
- Telecom-munications
- Operational impacts
- Applications and databases
- Recovery time objectives (RTO)
- IT Infra-structure
- Work around procedures
- Work area recovery
- Resources
- Personnel
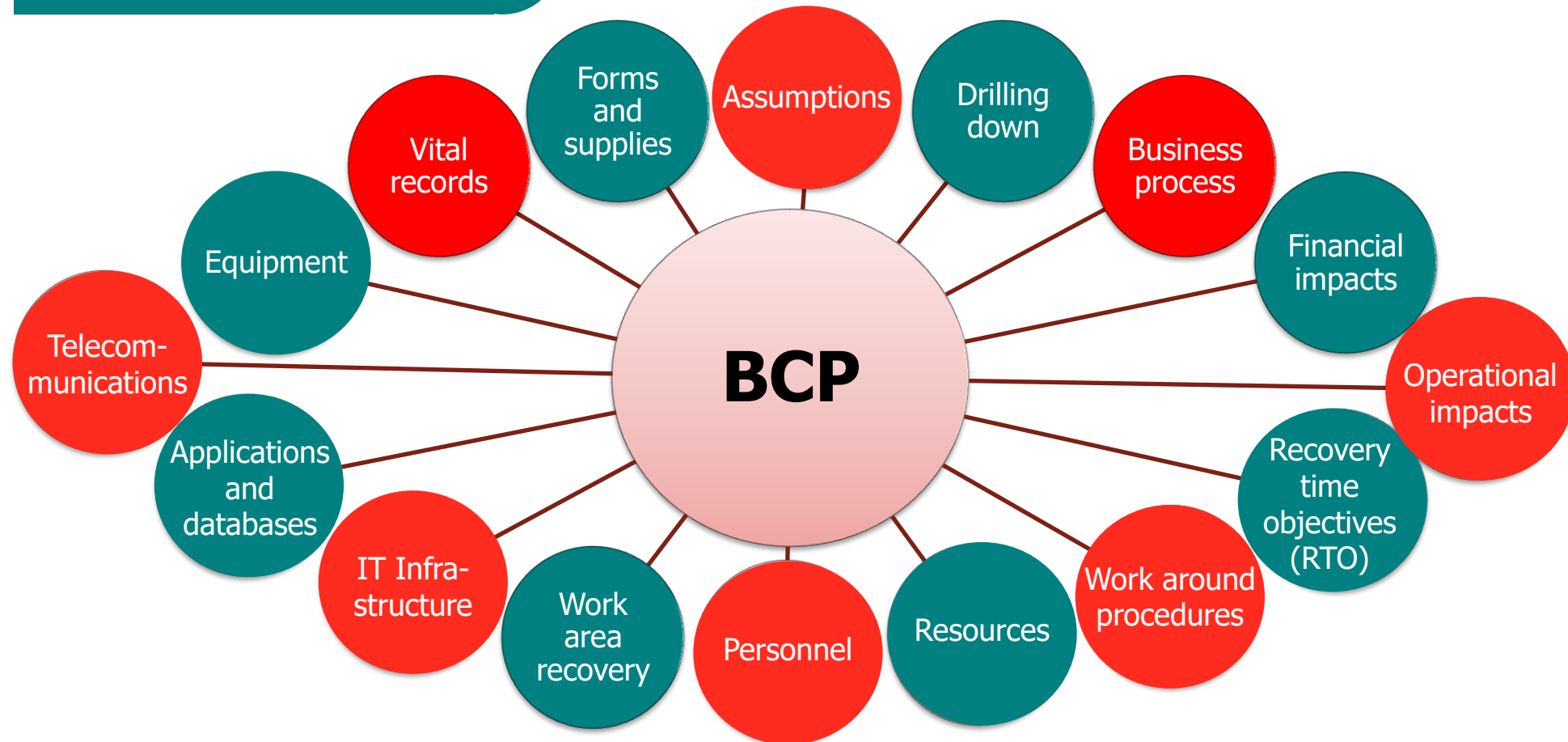
BCP Content Structure: Example

- Details of your BCP will vary, but typical plan contains:
  - Plan overview
  - Immediate actions and escalations
  - Business recovery procedures
  - Critical contacts
  - Crisis communications
  - Plan maintenance and testing
  - Appendix for specialized documents/forms

Know When to Activate Your Plan

Do not allow fear or hesitation to influence future decision-making if there is an incident threatening the business

Every incident is unique

Rely on continuity planning elements and escalation triggers

18

Key Business Processes and Consequences of Disruption

Failure to accomplish could impact:

- Reputation
- Customer trust and loyalty
- Financials
- Vendor relations
- Regulatory/legal requirements
- Employee welfare
- Other operational issues

Risk Assessment and Business Impact Analysis (BIA)

20

Disasters, Emergencies, and Other Potential Incidents

What incidents can impact your operations?

Severe weather

Fires – incidental, arson, wildfires, etc.

Product failures (e.g. Tylenol recall and Ford Pinto explosions)

Earthquake

Financial or market failure

Cyber attack

Workplace violence

Loss of key managers or leaders (individual or group)

Pandemics, epidemics

Others

Risk Assessment

- Risk assessment can be defined as:
  - Overall process of risk identification, risk analysis and risk evaluation

- **Risk** is the 'effect of uncertainty on objectives', which focuses on the effect of incomplete knowledge of events or circumstances...

Simple Risk Assessment Matrix

Risk

		Low (1)	Mid (2)	High (3)
Severity of impact	High (3)	3	6	9
	Mid (2)	2	4	6
	Low (1)	1	2	3
		Low (1)	Mid (2)	High (3)

Probability of impact

Risk Assessment Structure

- Quantitative

		SEVERITY = (MAGNITUDE - MITIGATION)						RISK
EVENT	**PROBABILITY**	**HUMAN IMPACT**	**PROPERTY IMPACT**	**BUSINESS IMPACT**	**PREPARED-NESS**	**INTERNAL RESPONSE**	**EXTERNAL RESPONSE**	**RISK**
	Likelihood this will occur	*Possibility of death or injury*	*Physical losses and damages*	*Interuption of services*	*Preplanning*	*Time, effectivness, resouces*	*Community/ Mutual Aid staff and supplies*	*Relative threat**
SCORE	*0 = N/A 1 = Low 2 = Moderate 3 = High*	*0 = N/A 1 = Low 2 = Moderate 3 = High*	*0 = N/A 1 = Low 2 = Moderate 3 = High*	*0 = N/A 1 = Low 2 = Moderate 3 = High*	*0 = N/A 1 = High 2 = Moderate 3 = Low or none*	*0 = N/A 1 = High 2 = Moderate 3 = Low or none*	*0 = N/A 1 = High 2 = Moderate 3 = Low or none*	*0 - 100%*
Risk 1	1	3	3	3	2	2	3	30%
Risk 2	3	2	1	2	1	1	2	50%
Risk 3								0%
Risk 4								0%
Risk 5								0%
Risk 6								0%
Risk 7								0%
Risk 8								0%
Risk 9								0%
Risk 10								0%
AVERAGE	0.40	0.50	0.40	0.50	0.30	0.30	0.50	2%

HAZARD AND VULNERABILITY ASSESSMENT TOOL
EVENTS

KAISER PERMANENTE.

*Threat increases with percentage.

RISK = PROBABILITY * SEVERITY

0.02	0.13	0.14

Photo Credit: California Hospital Association and Kaiser Permanente
https://www.calhospitalprepare.org/hazard-vulnerability-analysis

Business Impact Analysis Defined

- The process of analyzing the impact, over time, of a disruption on the organization

25

BCP: Business Impact Analysis (BIA)

If a serious event occurs, recovery resources for business functions may be limited, so consider these questions:

What are the resumption priorities for your business?

What is the realistic resumption time period for those priorities to minimize financial and/or operational impacts?

Can any of these priorities operate in an "emergency mode" – if so, for how long?
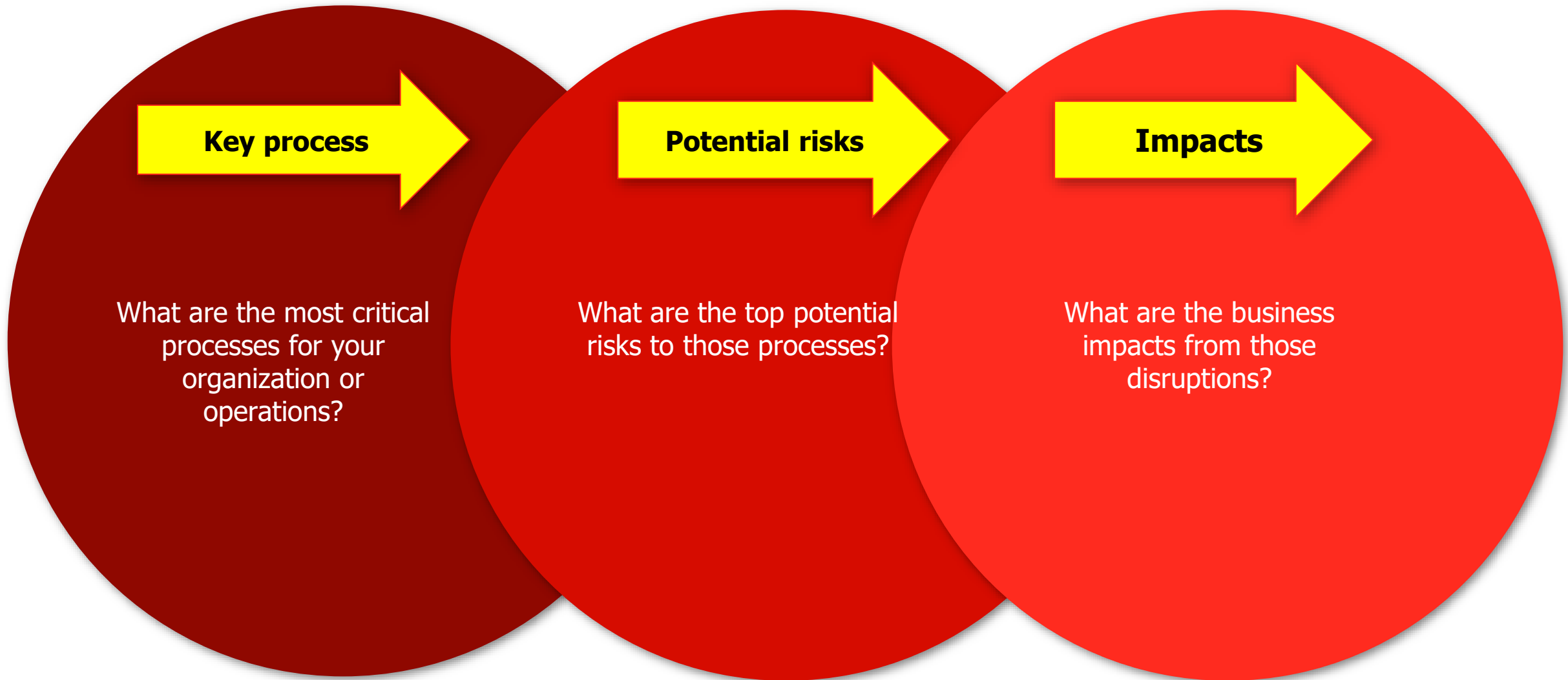
Where to start?
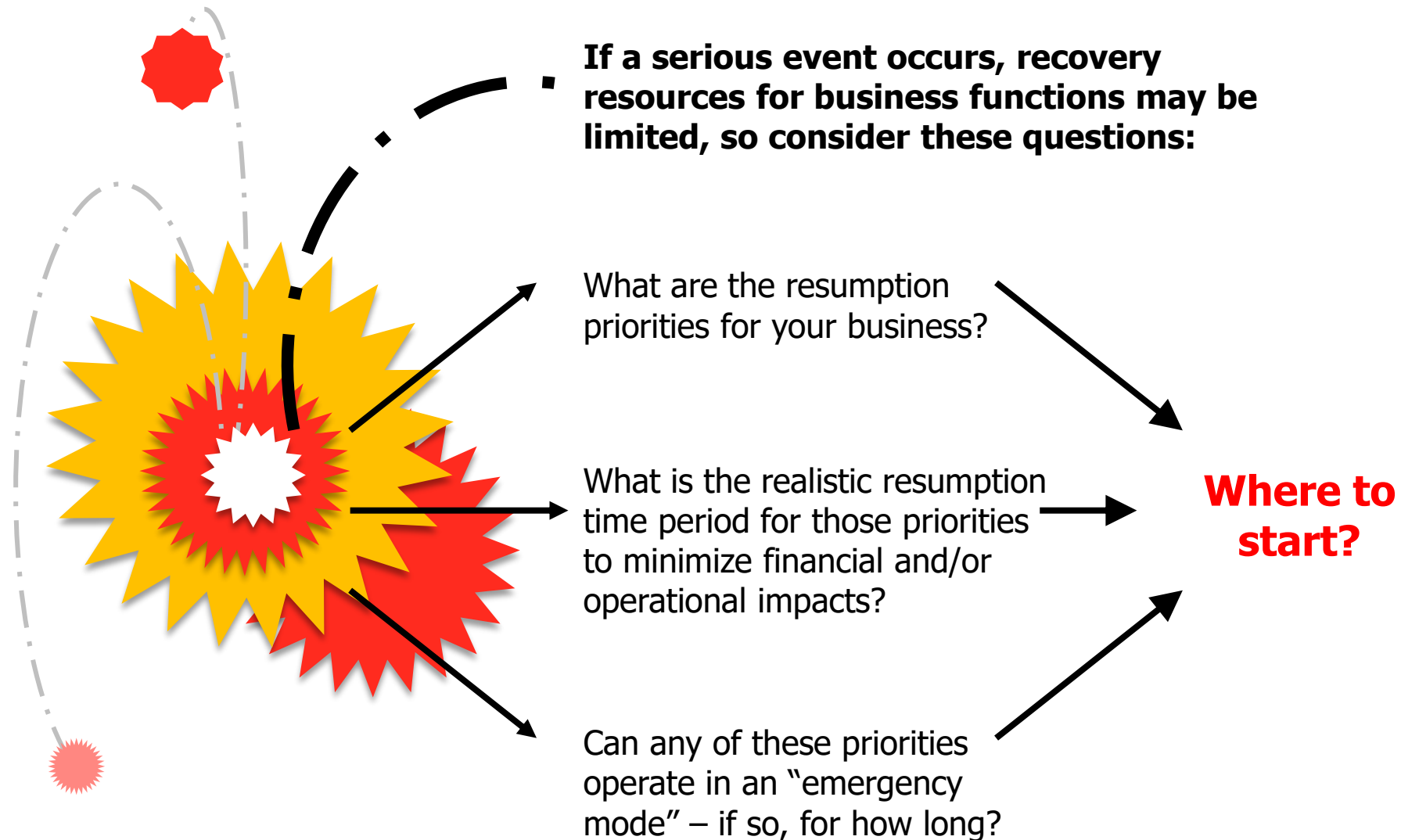
RTOs and RPOs

- Classifying Recovery Time Objectives (RTO)
  - Measure of the recovery of business operations within certain time periods
- Support planning around Recovery Point Objectives (RPO)
  - Measure of data recovery before it is lost

RTOs and RPOs

- GANTT Chart – good for mapping RTO and RPO

Function	0-2 hrs	2-4 hrs	4-6 hrs	6-8 hrs	8-10 hrs	10-12 hr	12-14 hr	14-16 hr	16-18 hr
Function 1									
Function 1.1									
Function 1.2									
Function 2									
Function 2.1									
Function 3									

Summary of BIA Process

Key process

What are the most critical processes for your organization or operations?

Potential risks

What are the top potential risks to those processes?

Impacts

What are the business impacts from those disruptions?

BCP Maintenance, Testing, and Evaluation

30

BCP: Maintenance and Testing

Establish team to maintain BCP

Assess current business and operational requirements

Testing considerations

Keep copy of BCP locally accessible in event of an emergency

Monitor/update/implement plan

31

Test the Plan

Discussion-based exercises

Talk through scenarios or impacts and discuss actions in alignment with plan

Operations-based exercises

Move people or equipment

Use secondary/tertiary resources to confirm that they will work

32
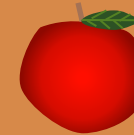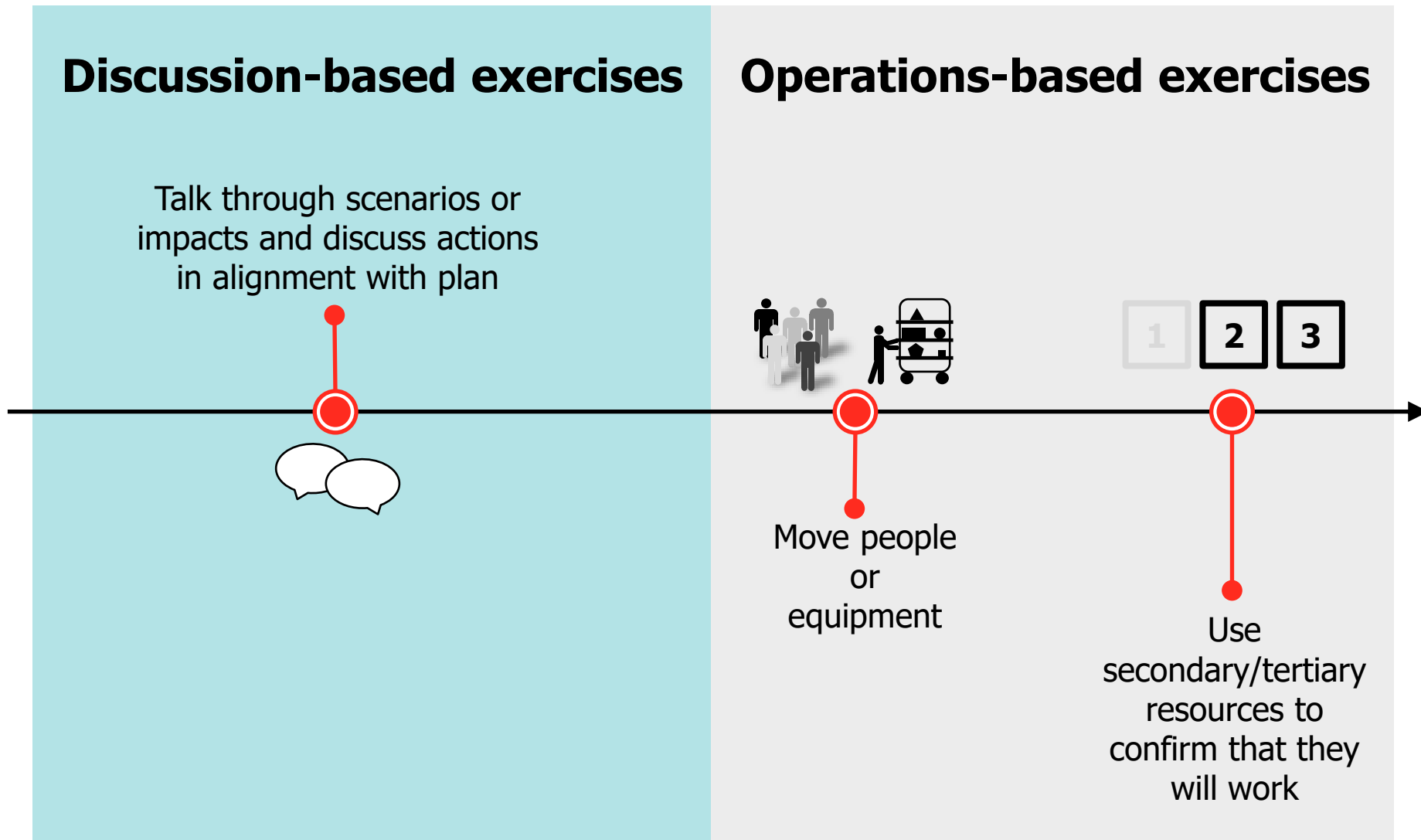
Plan Evaluation: After Events or Exercises

Debrief as a team

Assess what worked, what did not

Develop a corrective action plan to address BCP gaps and improvements

Document your findings and track your corrective actions

And, celebrate your successes!

POST EXERCISE

33

The Business Continuity Plan

34

Business Continuity Program Components

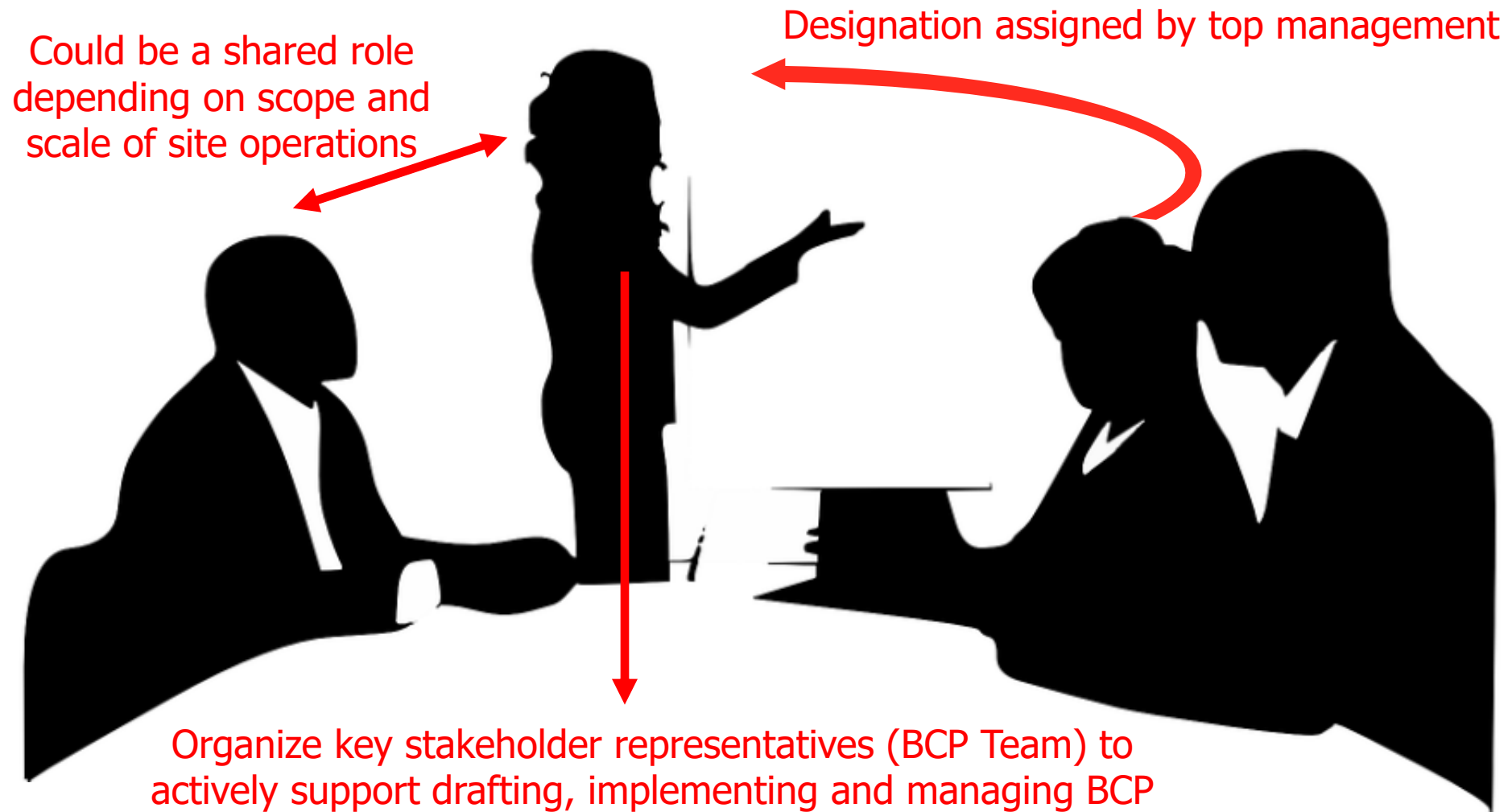# Top Management Responsibilities

- Resourcing

- BCP objectives

- Communications

- Planning

Business Continuity Champion(s)

Could be a shared role depending on scope and scale of site operations

Designation assigned by top management

Organize key stakeholder representatives (BCP Team) to actively support drafting, implementing and managing BCP

bsi.

37

Business Continuity Plan (BCP) Maturity Continuum

Totally Reactive
- Few or no written plans
- No assessments to understand risks to the organization
- No analysis of interdependencies/ impacts

Compliance Driven
- Only have compliance documentation
- Some planning documentation exists
- Some risks and impacts assessed, but not prioritized

Planning Driven
- Risks and impacts analyzed
- Written plans and procedures
- Plans validated through drills and exercises

Management System Driven
- Established management system in place
- Continuity tied to org initiatives
- Risks/ impacts/ lessons learned regularly tied back into planning process
- Org leadership directly involved in planning.

Continuity Leadership
- Establishing Best Practices
- Posture based on mitigation and resilience
- Well established analysis of risks, impacts, and continuity plans

Consider where you are now in your planning effort and where you want to be. Key indicators of maturity is not only having a plan, but a program to regularly assess and validate the plan.
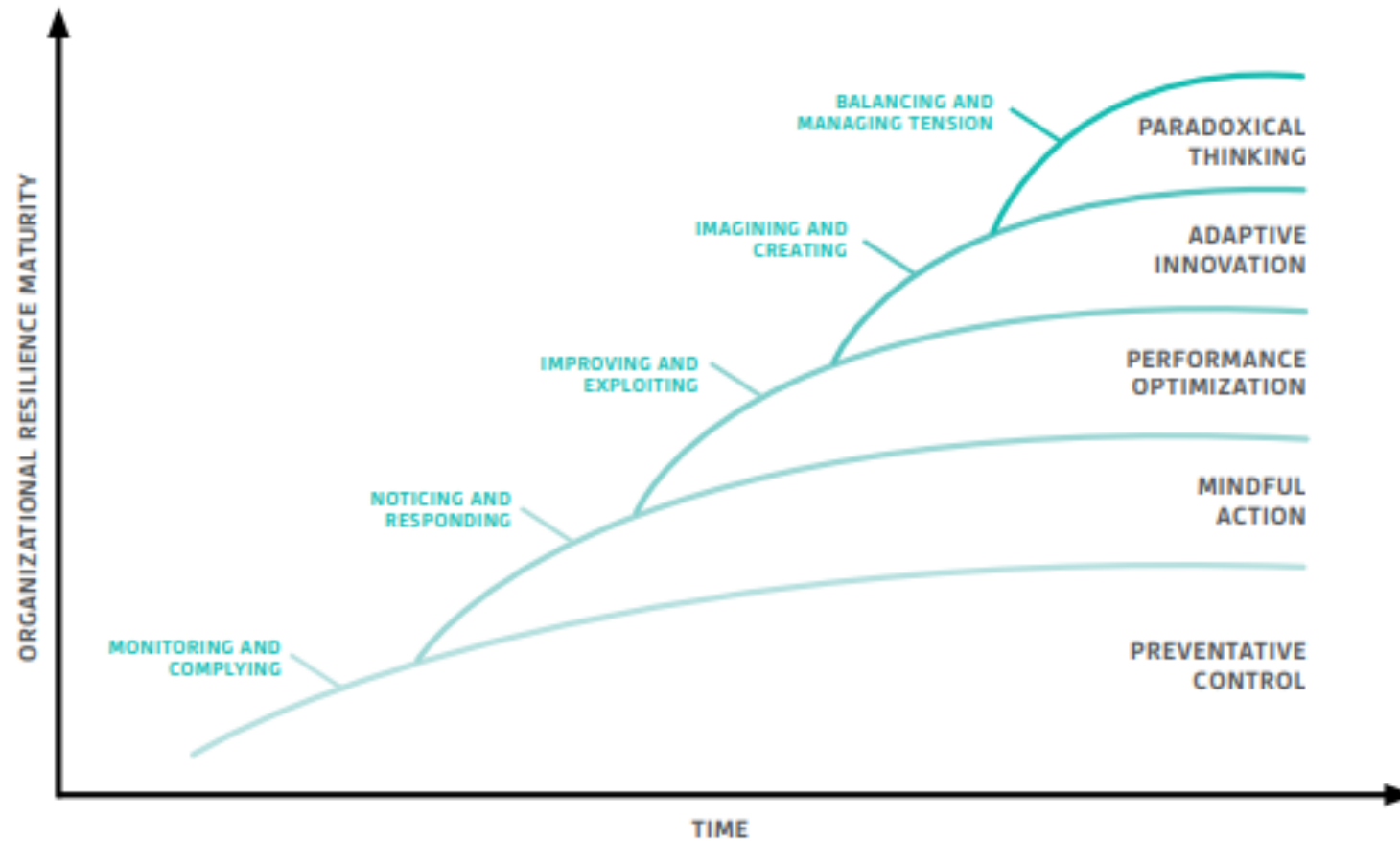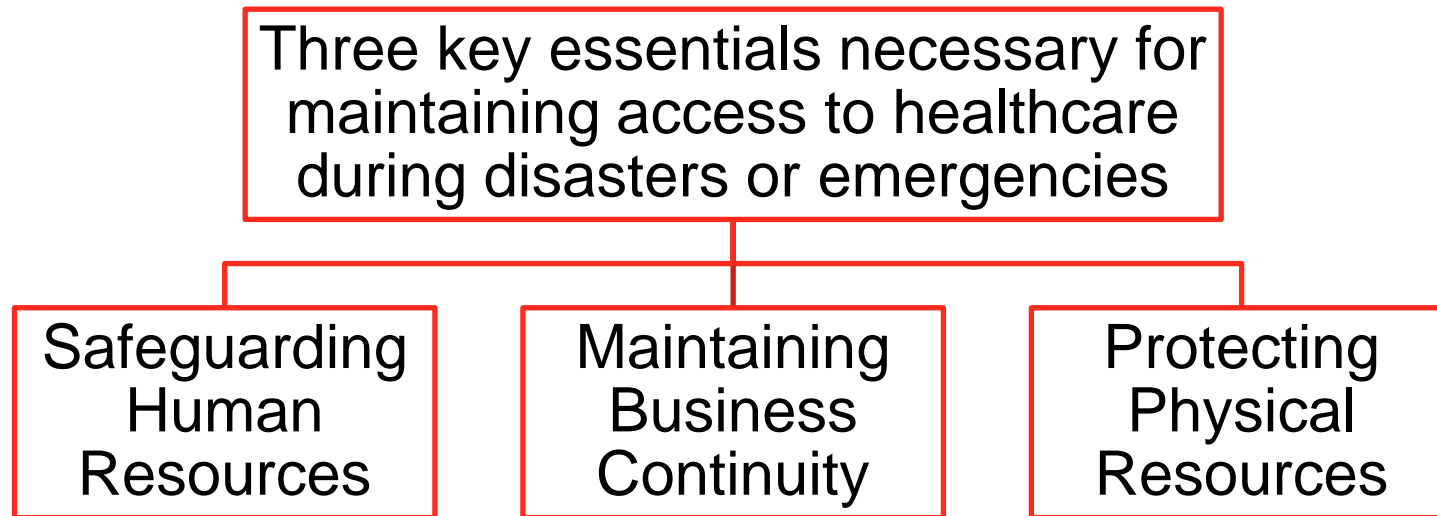
Evolutionary Phases of Organizational Resilience

Figure 1: The evolution of Organizational Resilience thinking over time

CMS Business Continuity Requirements

40

CMS Requirements

Three key essentials necessary for maintaining access to healthcare during disasters or emergencies

Safeguarding Human Resources

Maintaining Business Continuity

Protecting Physical Resources

Supporting all- hazards emergency preparedness programming

CMS Requirements

- Emergency Plans must support continuity of business operations

- Under Community Health Center, continuity of operations includes specific requirements, but also
  - delegations of authority
  - succession plans

- Areas to cover include:
  - Develop, review, and update emergency plan every two years
  - Method for information and documentation with other care providers for continuity of care

CMS Requirements

- Continuity of operations planning generally considers elements such as*:
  - Essential personnel
  - Essential functions
  - Critical resources
  - Vital records and IT data protection
  - Alternate facility identification and location
  - Financial resources

*Definition taken from section on Organ Procurement Organizations (OPOs) – definition is important, but not directly applicable

Break

10 minutes

Click here to start

44

Workshop 1

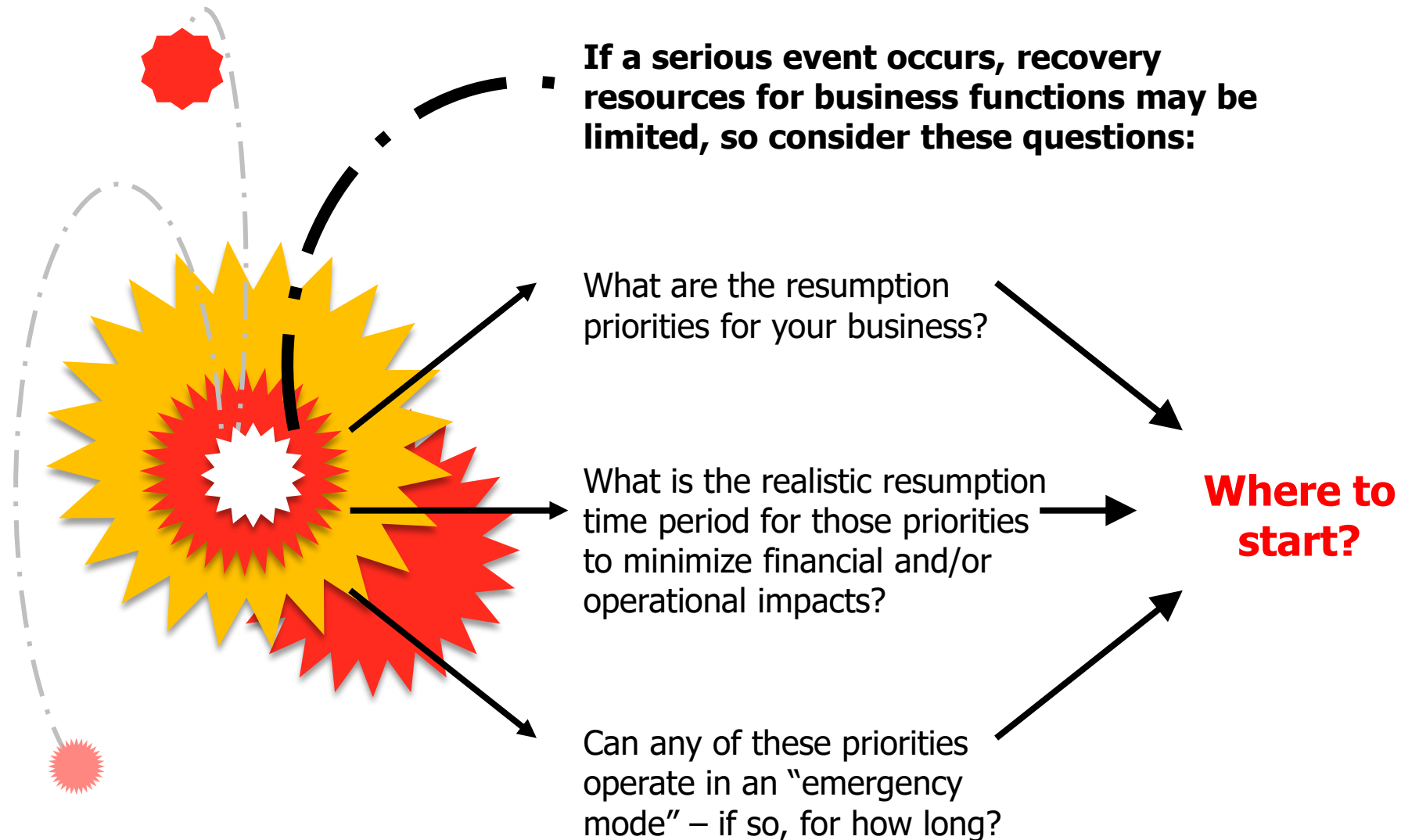Developing a Business
Impact Analysis
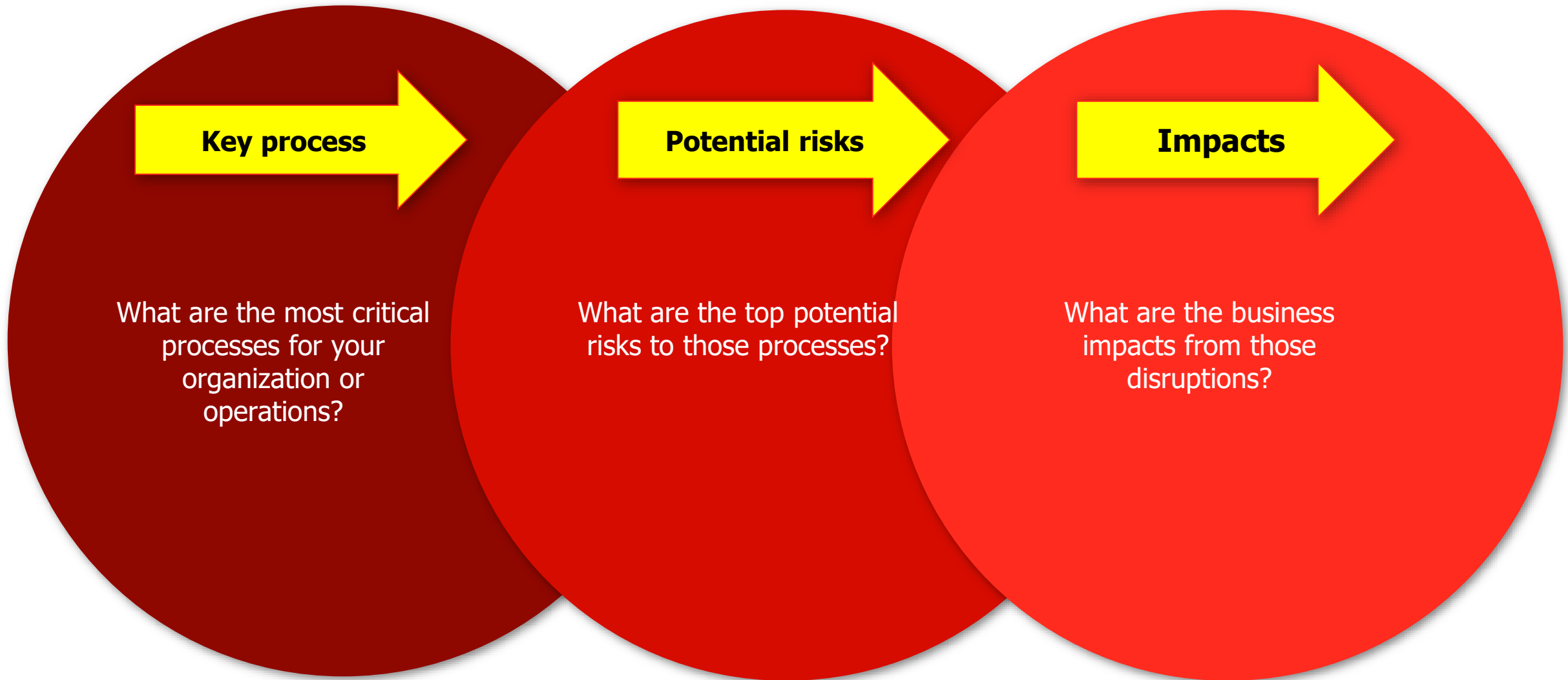
Recap: Business Impact Analysis Defined

The process of analyzing the impact, over time, of a disruption on the organization

Recap: Business Impact Analysis (BIA)

If a serious event occurs, recovery resources for business functions may be limited, so consider these questions:

What are the resumption priorities for your business?

What is the realistic resumption time period for those priorities to minimize financial and/or operational impacts?

Can any of these priorities operate in an "emergency mode" – if so, for how long?

Where to start?

Recap: Summary of BIA process

Key process

What are the most critical processes for your organization or operations?

Potential risks

What are the top potential risks to those processes?

Impacts

What are the business impacts from those disruptions?

48

Try It Yourself

1. Pick one process within your organization

2. Determine the critical services it relies upon

3. Think of the potential impacts if one or more of those services were to be disrupted

10 minutes

Click here to start
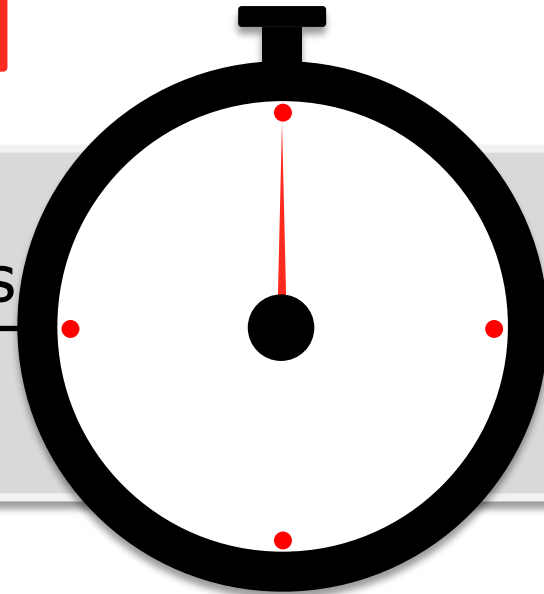
Break

5 minutes

Click here to start

50

Workshop 2

Lessons Learned and Plan Development
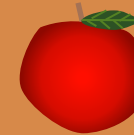
Recap: Maintenance and Testing

Establish team to maintain BCP

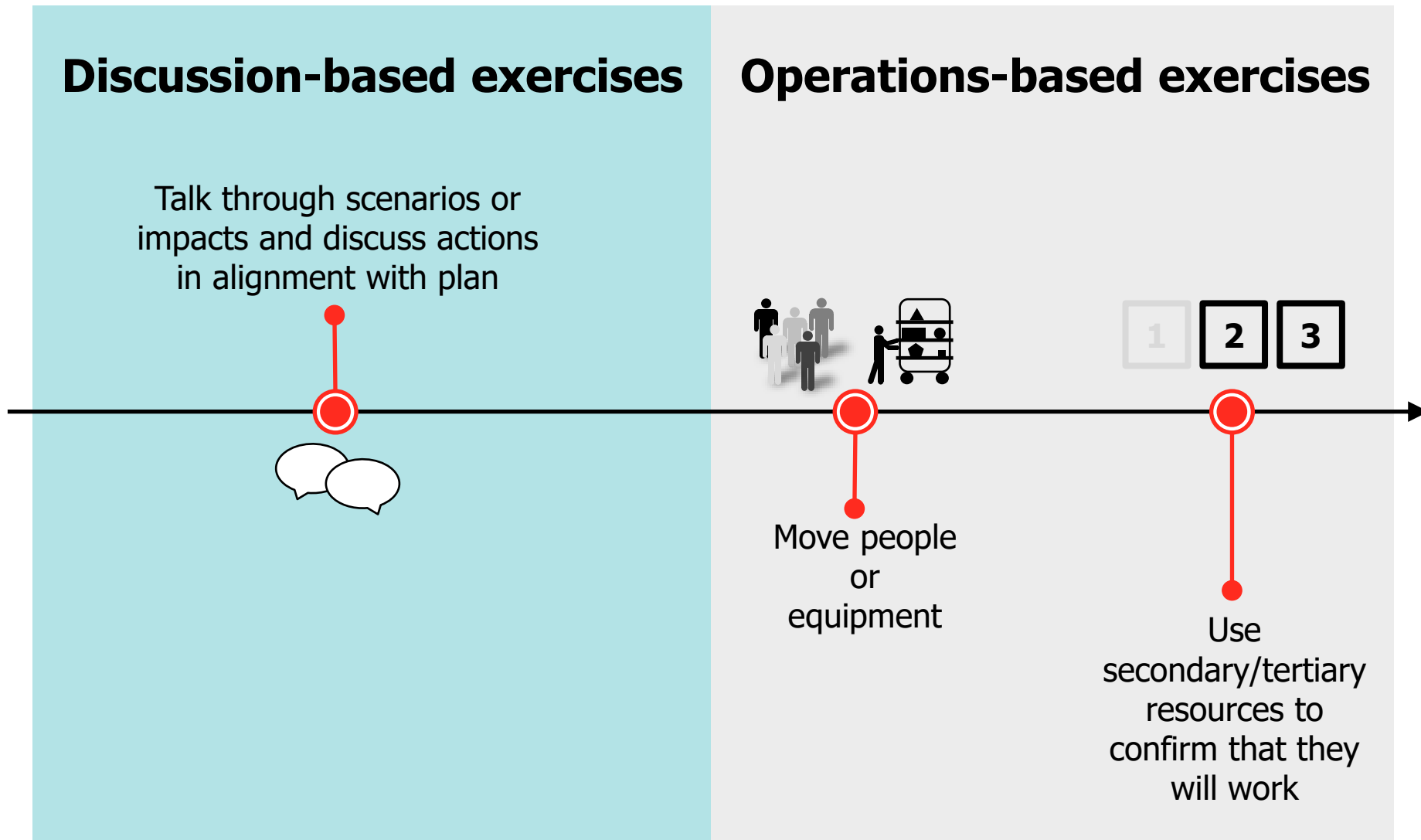Assess current business and operational requirements

Testing considerations

Keep copy of BCP locally accessible in event of an emergency

Monitor/update/implement plan

Recap: Test the Plan

Discussion-based exercises

Talk through scenarios or impacts and discuss actions in alignment with plan

Operations-based exercises

Move people or equipment

Use secondary/tertiary resources to confirm that they will work

53

Recap: Plan Evaluation

Debrief as a team

Assess what worked, what did not

Develop a corrective action plan to address BCP gaps and improvements

Document your findings and track your corrective actions

And, celebrate your successes!

POST EXERCISE

54

Now It's Your Turn

1. Identify a lesson you or your organization has learned from COVID-19.

2. Reflect on how that will be incorporated into your BCP based on what you've learned today.

10 minutes

Click here to start
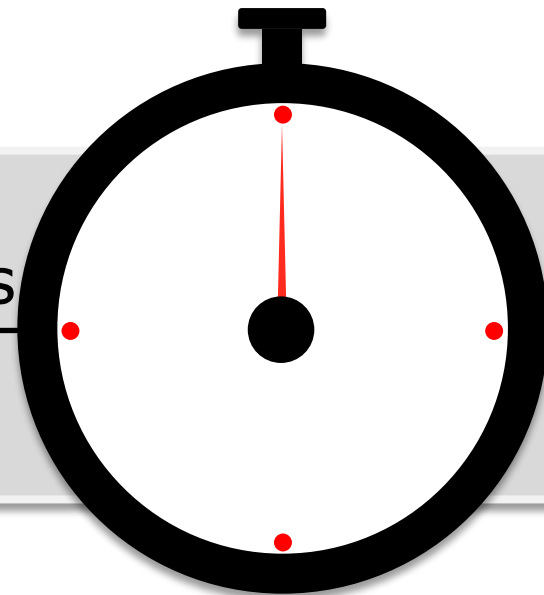
Additional Information

Additional Information

Questions?

David Bernstein, MPA, CBCP, CEM, CHEP, CHPCP

David.Bernstein@bsigroup.com

O: 949-420-0671 | M: 949-424-7527

bsi

Webinar slides, recording, handout & evaluations will be emailed

Attendees will also be emailed an opportunity for "office hours" with BSI

Questions/Comments Contact Patricia Gepert (pgepert@wacommunityhealth.org)