

# Continuity Planning Job Action Sheet

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## Initiating Organizational Continuity Capability

Continuity planning ensures the ability to sustain essential functions relating to patient care, and facility and business operations across a wide range of potential emergencies for an extended period of time.

It is recommended that continuity plans be developed as part of a comprehensive planning strategy informed by risk analysis and functional assessments, which enable the organization to allocate resources to those areas of greatest risk and where the most benefit from investment may be achieved.

Analyzing risk through a business process analysis (BPA) and business impact analysis (BIA) aids in the validation of essential functions and identification of gaps in operational processes and procedures, information technology, communication systems, and facilities. These assessments may also aid in the identification of interdependencies, non-obvious risks, and improvement not only to an organization's readiness for a continuity event, but they also strengthen its normal operations.

Recommended assessment and planning activities include:

- Conducting a risk assessment to identify and analyze potential threats and hazards;
- Conducting a business process analysis (BPA) to identify and document activities and tasks performed within an organization;
- Conducting a business impact analysis (BIA) to identify and evaluate how the organization's threats and hazards may impact the organization's ability to perform its essential functions;
- Identifying and prioritizing the organization's essential functions, and essential supporting activities, systems, resources and staff, which support the execution of those essential functions;
- Identifying mitigation options for risks identified in the BIA (e.g., alternate facilities, telework policies, devolution procedures, mutual aid agreements); and
- Drafting a comprehensive plan that outlines the requirements and procedures needed to perform essential functions and establish contingency plans.

### I. Assess Current State of Organizational Continuity Program

- ➔ Identify existing continuity-related plans and capabilities.

If the organization does not have a continuity plan, it will find continuity elements integrated into existing plans, programs and functions (i.e. emergency operations plan, IT disaster recovery, pandemic plan, incident management, risk management).

- ➔ Review results from past exercises and events to inform continuity program development.

- ➔ Identify applicable accreditation standards, regulations, and requirements to guide development of continuity plan.

- ➔ Identify key project personnel and those with planning roles and responsibilities; assess time/resource demands.

➤ *See Appendix: Key Roles and Responsibilities*

➔ Identify preliminary budget and resource requirements.

➔ Develop briefing material for executive-level leaders on project scope and timeline, objectives, return on investment, and role of leadership.

➤ *See Appendix G: Importance of Executive Level Support*

➔ Develop continuity planning education and training for steering committee, planning committee and department leaders.

➤ *See Appendix G: Presentation Series for Leadership and Department Heads*

## II. Build Executive-Level Support

➔ Brief executive-level leaders on project scope and timeline, objectives, return on investment, and role of leadership.

➤ *See Appendix G: Continuity Planning: Importance of Executive Level Support (PPT)*

➔ Ensure leadership understands program roles and responsibilities, and supports personnel, time resource and budgetary needs.

➔ Identify individual executive-level sponsor.

➔ Identify a continuity planning team and establish organizational buy-in.

## III. Establish a Governance Model & Project Management

It is recommended that continuity plans be developed as part of a comprehensive planning program that establishes a management framework and operational procedures to sustain each essential function and guide the recovery and reconstitution of operations, as well as a strategy informed by risk analysis and functional assessments, which enable the organization to allocate resources to areas of greatest risk and where the most benefit from investment may be achieved.

➔ Establish a continuity steering committee responsible for program governance and strategic decisions.

➤ *See Appendix: Steering Committee & Governance Responsibilities*

➔ Appoint continuity planning committee & program coordinator responsible for executing project activities and operational plan development.

➔ Identify and incorporate results from past exercises and events into continuity program development.

➔ Develop a continuity project plan to guide development of the organization's continuity capability.

➔ Determine continuity program budget needs and how will the organization fund the continuity program and acquire necessary resources to support the implementation of the continuity plan during a continuity event.

Through the planning and budgeting process, organization leaders should align, allocate and ensure the availability of critical resources needed to continue the performance of essential functions, considering the resource needs before, during, and after an emergency or disruption.

- Before a continuity plan activation: Organizations should budget for continuity resources and requirements identified as part of the readiness and preparedness phase, including communications equipment, infrastructure, training, and exercises.
- During a continuity plan activation: Organizations should procure equipment, supplies, and resources not already in place that are needed to sustain operations.
- Following a continuity plan activation: The recovery and return to normal operations phase may require funding to restock and replace resources, and address areas for improvement.

➔ Determine the planning assumptions upon which the continuity plan will be based. List these within the Readiness and Preparedness section of the continuity plan.

An organization’s planning assumptions and considerations will differ based on their risk assessments and other individual factors. There are some fundamental assumptions and considerations that should be incorporated into the planning process of an all-hazards continuity plan including:

- The continuity plan must be capable of implementation with and without warning, and it must be operational no later than 12 hours after activation and sustained for up to 30 days with resource support.
  - *See Continuity Plan Template Section V. (A.) Readiness and Preparedness: Planning Assumptions and Considerations*

## Developing a Comprehensive Continuity Plan

### I Purpose

➔ Explain why the organization is developing a continuity plan and the overall purpose to ensure the continuity of essential functions.

The goal of continuity planning is to ensure that the organization is capable of fulfilling its mission and essential functions during an extended emergency or disruption. To do so, it must be capable of performing patient care services and its most important and time critical business operations and ancillary support functions.

### II. Applicability and Scope

➔ Describe the applicability of the plan to the health care organization as a whole.

➔ Define what the continuity plan covers and what it does not cover, and what is located in other plans and policies.

➔ Describe any applicable relationships with parent and/or partner organizations as well as any on-site or multi-site organization operations.

### III. Essential Functions

An important first step in creating a continuity plan is to identify the essential functions of an organization. In order to do so, the organization should conduct:

- risk assessments;
- business process analysis (BPA); and
- business impact analysis (BIA).

The essential functions section of the continuity plan should list the organization's prioritized essential functions. Essential functions are those organizational functions and activities that must be continued under any and all circumstances. Other services not deemed essential should be deferred until additional personnel, assets and resources are available.

➔ Identify all functions of the organization.

Important functional areas include:

- access to health workforce
- facility/organization services, operations and infrastructure
- clinical services
- access to healthcare supply chain
- access to medical/non-medical transportation
- information technology systems
- business, administration and finance operations

➔ Identify essential functions which must be continued under all circumstances.

➔ Conduct and/or review risk assessments.

➔ Identify and analyze risks.

Risk assessments will help inform the Business Impact Analysis (BIA) process by identifying and analyzing risks, characteristics of the threats and hazards, determining acceptable levels of risks, identifying mitigation activities, and considering the associated costs and benefits.

➤ *See Appendix: Risk Assessment*

➔ Conduct a business process analysis (BPA).

A business process analysis (BPA) is a systematic process that identifies and documents the activities and tasks that are performed within an organization and supports the development of detailed procedures for performing its Essential Functions.

➤ *See Appendix: Business Process Analysis*

➔ Conduct a business impact analysis (BIA).

A business impact analysis (BIA) is a method of identifying the consequences of failing to perform a function or requirement.

➤ *See Appendix: Business Impact Analysis*

➔ Analyze the BPA and BIA data and rank essential functions according to priority.

➔ Determine the recovery time objective (RTO) for each essential function.

Recovery time objective is the period of time to recover an essential function's performance if that function has been interrupted. A statement should be drafted indicating how quickly the essential function will resume if disrupted.

➔ Identify essential supporting activities, critical systems, equipment, staffing, resources, space, and cost requirements needed to perform each of the essential functions during a continuity event.

➔ Identify interdependencies, workflow processes, and support functions that ensure the continued performance of the organization's essential functions.

➔ Identify and plan for mitigation options to support the continuance of essential functions.

i.e. identifying alternate sites, telework, developing devolution plans and mutual aid agreements.

➔ Develop a plan to perform additional functions as the situation permits.

➔ Complete the essential function section of the organization's continuity plan and list the essential functions in priority order.

➤ *See Section III: Essential Functions in the Continuity Plan Template and Table 1: Essential Function Table*

➔ Summarize the results of the BIA in the continuity plan.

Note how threats affect:

- requirements for a continuity facility and infrastructure;
- risks to essential records, servers, data lines, and information technology systems and equipment; and
- risk prevention and mitigation tactics.

Refer to Section III- A. Business Impact Analysis Summary in the Continuity Plan Template

➔ Summarize the results of the BPA for each Essential Function.

Include:

- recovery time objectives (RTO);
- staffing required to complete the function;
- equipment, supplies, records, information technology system access, and communications necessary to conduct work;
- facility space and infrastructure requirements;
- supporting activities;
- dependencies; and
- expected costs for continuity.

Include a workflow process description and/or diagram or reference the appropriate standard operating procedure (SOP) that details every step to complete each essential function. (Imagine that a temporary employee with the required credentials, but without knowledge of organization-specific procedures, comes in to assist; outline the steps so they complete the work as intended.)

➤ *Refer to Section III - B. Essential Functions and Resource Summary in the Continuity Plan Template*

➔ Describe internal support activities that will help ensure the ability to support essential functions, including issues like plans for pay and benefits, administrative support, and establishing a break schedule for continuity team members.

➤ *Refer to Section III - C. Support Functions in the Continuity Plan Template*

➔ Explain how interdependencies will be managed.

Considerations include:

- who and how does the organization count on to complete your essential functions?
- how would these needs be accessed or accomplished if either or both organizations are in continuity operations?
- what are the recovery time objectives (RTOs)?

➔ What other entities or affiliates depend on your organization to complete their essential functions? Does this create additional essential functions for your organization?

➤ *Refer to Section III - D. Interdependencies in the Continuity Plan Template*

## IV Concept of Operations

### A. Activation

#### 1. Decision Process

➔ Determine who has the authority to activate the continuity plan.

It is recommended this authority be granted to the healthcare organization head (HCO Head) and a designated successor.

➔ Outline steps in the activation decision process.

Suggested steps include:

- HCO Head is aware/notified that a disruption to normal operations is planned, anticipated, or has occurred;
- HCO Head evaluates the situation along with its potential, anticipated, or known effects on agency operations and decides whether to activate the continuity plan; and
- HCO Head initiates the process to inform all employees of the situation and the actions they should take.

➔ Develop specific procedures to activate the continuity plan.

#### 2. Alert and Notification Process

This section should explain how the organization will issue initial notification to staff that an incident has occurred. This may include mass notification systems, alarms, and public address systems within the building, emails, phone calls, press releases, agency website banners, or other methods of communication.

➔ Determine and outline steps for internal and external notification of plan activation.

➔ Develop procedures by which personnel will be notified in the event an incident requires activation of an alternate location.

➔ Outline steps to communicate the organization's ongoing operating status to all staff and external partners.

Process for notification of activation and ongoing operating status should include:

- Who is responsible for making notifications?

- What entities/departments/titles need to be notified of activation?
- What is the method of notification?
- What is required to verify that notification has been received?

### 3. Implementation Process

This is the phase where organizations implement and execute the strategies identified in the continuity plan to ensure that the essential functions are accomplished. The operations phase includes, but is not limited to:

- performing essential functions;
- accounting for personnel, including identifying available leadership;
- establishing communications with interdependent organizations and other internal and external stakeholders, including the media and the public;
- providing guidance to all personnel; and
- preparing for the recovery of the organization.

Organizations should identify the procedures, actions and information needed to support continuity plan implementation and conduct continuity operations. Below are elements included in the Continuity Plan Template. While each element should be included in a continuity plan, they may be organized differently within the organization's plan.

- *Alternate facility planning elements are outlined in Section IV. Concept of Operations; B. Alternate Facility Operations*

#### 3a. Continuity Personnel and Assignments

The continuity plan should delineate operational responsibilities and functions. It is recommended that continuity teams be formed to carry out essential functions upon continuity plan activation and will be required to report for duty during an event.

Staff members who do not have specified continuity plan roles or responsibilities may be referred to collectively as the continuity support team. Support team members may be temporarily reassigned to another duty station or advised to remain at or return home pending further instructions. Individuals from the support team may be used to replace unavailable primary continuity team members or to augment the overall continuity plan response.

➔ Identify primary and alternate personnel needed to support the performance of essential functions.

➔ Delineate operational roles and responsibilities of continuity teams and personnel.

➔ Train primary and alternate continuity personnel on plans and strategies, clearly explaining roles and responsibilities.

- *See Table 3. Assignment of Responsibilities*

➔ Provide all staff members with continuity awareness training.

➔ Develop and maintain up-to-date contact information for primary and alternate continuity personnel.

- *See Table 2. Continuity Personnel Roster*

➔ Provide all staff members with continuity awareness training.

➔ Ensure that the needs of continuity personnel with disabilities are considered.

➔ Identify and list needed contents of go-kits for continuity personnel and process for acquisition and replacement of items.

Continuity personnel should be responsible for creating and maintaining go-kits, which may be pre-positioned at alternate locations or carried with them. A process should be developed for acquisition and replacement of items and to ensure their currency.

➤ See *Continuity Template Table 4. Go Kit Contents.*

### 3b. Communications Systems

The success of continuity programs is dependent on the availability of and access to communications systems with sufficient resiliency, redundancy, and accessibility available to perform essential functions. This section should identify the interoperable communications and information technology systems for continuity of communications among organization leaders, internal personnel, external organizations and the public. This may be done using Continuity Plan Template Table 5. Communications Systems Tracking Table.

Organizations should integrate communications contingency needs into continuity planning efforts by incorporating mitigation options to ensure uninterrupted communications support. The risk assessment and business impact assessment (BIA) identifies risks to primary and alternate communications systems involved in the performance of essential functions, which are identified during the business process analysis (BPA).

➔ Identify redundant interoperable communications capabilities needed for the performance of essential functions.

Consider communications needed for the primary facility location; alternate facility locations; telework or virtual office locations; and employees with disabilities and hearing impairment.

➔ Incorporate mitigation options to ensure uninterrupted communications support.

➔ Ensure access to and interoperability between communications resources at alternate locations and as part of mutual aid agreements.

➔ Assess potential redundant options.

Consider options including:

- high frequency and amateur ham radio;
- satellite systems for voice and data;
- Wireless Priority Service (WPS); and
- Government Emergency Telecommunications Service.

➔ Confirm that current copies of essential records, including electronic files and software, are backed-up and maintained off-site.

➔ Train appropriate personnel on use of primary and backup communications systems and access to information systems.

### 3c. Continuity Event Communications

It is important for personnel to remain aware of the recovery status of the workplace and to know when/if they are required to assume an alternate role, and for the organization to remain aware of the health and personal recovery status of personnel, to provide them assistance, and to utilize the available workforce efficiently.



➔ Develop a strategy and methodology to communicate the organization's ongoing operating status to all staff and external partners

Include information and procedures about:

- the expected frequency of ongoing communication;
- who is primarily responsible for ensuring communication; and
- whether two-way communication is required to ensure receipt of messages.
  - *See Continuity Plan Template Table 6: Continuity Event Communications Tracking.*

➔ Identify interoperable communications capabilities to support senior leadership while in transit to or at an alternate location, or when communications have failed at the primary operating facility.

➔ Establish point-of-contact rosters of trained primary and alternate continuity personnel.

- *See Continuity Plan Template Table 2. Continuity Personnel Roster*

➔ Develop a process and assign responsibilities for documenting, maintaining and updating contact rosters for internal personnel, external stakeholders, and service providers.

➔ Outline the processes senior management will use to track development of the incident and applying the effects of these developments to:

- the health and safety of personnel;
- execution of essential functions; and
- potential effects on communications and information technology systems, facilities, equipment, and other essential resources.

### 3d. Leadership

This section should identify lines of succession and delegations of authority.

Orders of succession are formal, sequential listings of positions (rather than specific names of individuals) that identify who is authorized to assume a particular leadership or management role when the incumbent is unable to perform the functions and duties of the position. Organizations should establish and document orders of succession for the organization head and key positions required to authorize and approve essential functions and reconstitution, and to maintain financial and legal responsibilities.

Delegations of authority ensure the orderly and predetermined transition of responsibilities within an organization and are related to, but distinct from, orders of succession. Delegation of authority provides the legal authorization to act on behalf of the organization head or other officials for specified purposes and to carry out specific duties.

Delegations of authority will generally specify a particular function that an individual is authorized to perform and includes restrictions and limitations associated with that authority. Orders of succession and delegations of authority should be: written in accordance with applicable organization policies to ensure the organization's essential functions continue to be performed; regularly reviewed by the organization's legal department; and designated and maintained as essential records. Delegations of authority should have sufficient breadth to ensure the organization can perform its essential functions.

➔ Establish and document orders of succession to ensure predefined transition of leadership.

Orders of succession should:

- include at least three positions permitted to succeed to the position, if possible;
- list successors in the order they would assume the role;
- be described by positions or titles, rather than names to limit revisions to plan;
- describe the process for transferring authority; and
- include devolution counterparts.

➤ *See Table 1. Order of Succession List*

➔ Establish and document delegations of authority to make key decisions, conduct essential functions, and direct the organization.

Include delegations of authority for each position listed in the orders of succession. These documents should:

- outline the authority for individuals to make policy decisions;
- designate responsibilities that may/may not be assumed;
- explicitly outline the authority of a job holder to re-delegate functions and activities, as appropriate;
- delineate the limits of and any exceptions to the authority and accountability; and
- define the circumstances, including devolution, under which delegations may be activated and terminated.

### 3e. Human Resources Considerations

Organizations should facilitate dialogue among human resources and continuity planners when developing continuity plans and programs. Topics to address include the designation of employees as continuity personnel, the designation of employees who are telework-capable to support continuity operations, and those employees that will be excused from duty due to the emergency situation.

➔ Identify personnel that are needed in order for the organization to continue to perform essential functions during and after the continuity activation. Designate such personnel as essential continuity personnel and assign backups or alternates.

Essential continuity personnel may be required to go to alternate locations or telework during a continuity plan activation to ensure the continued performance of an organization's essential functions.

➔ Develop processes to prepare continuity personnel and alternates to conduct or support continuity operations, including clear written explanation of expectations, roles, and responsibilities.

➔ Provide guidance to employees on individual and community preparedness actions to ensure their readiness during a continuity activation.

➔ Implement a process to account for all staff, including contractors, in the event of an emergency.

➔ Establish procedures to contact all staff, including contractors, in the event of an emergency to communicate and coordinate activities, provide alerts and notifications, and communicate how, and the extent by which, employees are expected to remain in contact with the organization during an emergency.

➔ Describe the process and department/title responsible for hiring temporary or permanent replacement staff if needed to ensure the presence of qualified, credentialed workers to perform essential functions.

➔ Develop continuity guidance policies for human resource for issues.

Issues to address include:

- work schedules and leave/time off;
- monitoring the well-being and personal recovery needs of staff, and describing employee assistance programs to meet anticipated needs;
- ensuring the accessibility, communication and other needs of employees with disabilities are considered during planning;
- benefits, and premium and annual pay limitations are considered; and
- ensuring any applicable collective bargaining obligations are satisfied.

➔ Designate where HR continuity policies are located, how they are maintained and updated, and point of contact.

### 3f. Mutual Aid

➔ Describe and reference the location of applicable MOUs, MOAs, emergency contracts, service level agreements (SLAs) or other arrangements to augment resources and support the continuation of essential functions.

### 3g. Expected Costs

➔ Outline or summarize the anticipated costs directly associated with the continuation of essential functions during a continuity event, and describe the process for approval of expenditures. (This is different from the continuity program budget.) This information may be detailed in an annex or other location.

### 3h. Devolution

Devolution is the ability to transfer authority and responsibility from an organization's primary operating staff and facilities to other designated staff and alternate locations to sustain essential functions. A continuity plan's devolution option addresses how an organization will identify and transfer organizational command and control, as well as the responsibility for performing essential functions, to personnel at a location unaffected by the incident.

Devolution planning should support overall continuity planning and address all-hazards and emergency events that may render an organization's leadership or staff unavailable or unable to support execution of the organization's essential functions from either its primary operating facility or alternate location.

In some instances, devolution may not be a viable option for an organization. Organizations that use a devolution plan that is separate from their continuity plan should include baseline information from their devolution plan in this section including references to where this information is located. The separate devolution plan should be designated as an essential record.

The plan should address elements including budgeting and acquisitions, essential functions, orders of succession and delegations of authority specific to the devolution site, interoperable communications, essential records management, staff, training, and reconstitution.

➔ Outline the procedures for transferring responsibility for essential functions to a different or geographically separated division within the primary organization. Include a copy of the contract if devolution will be to a separate organization.

➔ Identify events that might trigger devolution and specify how and when control and direction of the operations will be transferred between entities.

- ➔ Provide an overview of procedures outlining workforce protection strategies to prevent the need to devolve. This may include strategies such as social distancing, telework, split shifts, or increased workplace hygiene.
- ➔ List devolution site(s), contact information, leadership and whether they have been included in the hospitals' delegations of authority.
  - *See Continuity Plan Template Table 1. Devolution Site(s)*
- ➔ Include a roster that identifies fully equipped and trained personnel who will be stationed at the designated devolution site and the authority to perform essential functions and activities.
  - *See Continuity Plan Template Table 2. Trained Devolution Counterparts*
- ➔ Identify what training will need to be given to devolution site staff so they are able to take over the hospital's essential functions. This could be how to perform a certain duty or even where and how to access patient records that they may not be familiar with.
  - *See Continuity Plan Template Table 3. Trained Devolution Counterparts*
- ➔ List prioritized essential functions that a devolution site may need to know so they can carry out the most vital services and functions of that health care organization. Define the tasks that support, and resources to facilitate, those functions.
  - *See Continuity Plan Template Table 4. Essential Functions to be Devolved*
- ➔ List or reference the necessary resources to facilitate the immediate and seamless transfer of essential functions to the devolution site.
- ➔ Establish and maintain reliable processes and procedures for acquiring the resources necessary to continue essential functions for extended periods.
- ➔ Record what vital files, records and databases the devolution staff may need to carry out functions. Also list what type of record it is, the last update made to records, where they can be found and also if they are already pre-positioned or already accessible at the devolution site.
  - *See Continuity Plan Template Table 5. Resource Requirements*
- ➔ Record any communications capabilities the devolution site should have to carry out their essential functions. This could be anything from voice, radio, data and video capabilities.
  - *See Continuity Plan Template Table 6. Communications Requirements*
- ➔ Describe responsibilities to maintain situational awareness and ongoing communications with senior leadership and personnel.
- ➔ Establish and maintain the ability to restore, or reconstitute, authority to the primary facility upon termination of devolution.

## **B. Alternate Facility Operations**

This section should identify initial arrival procedures as well as operational procedures for the continuation of essential functions at an alternate facility location.

Alternate locations are sites where the organization can continue or resume essential functions separate from the primary operating facility and where organizational command and control of essential functions occurs.

The use of alternate locations may not be viable for all organizational essential functions and the effectiveness of this option will be dependent upon factors identified during the Business process Analysis (BPA), including resource requirements and flexibilities.

Organizations should consider at least one alternate location for the relocation of a limited number of the organization's key leaders and staff. This may include another facility or virtual office options. The alternate location should be located where it will not be vulnerable to the same disrupting events that damage the primary operating facility.

A separate alternate facility operational plan may be developed to address alternate care facility operations; however, the initial steps taken to activate and begin operations should be addressed within the plan here. As long as the information is cross-walked and identical, it is acceptable to have duplicate information in both the continuity plan and the alternate facility operational plan. A written indicator to ensure proper cross walking of these two plans should be indicated in the maintenance and review section of each plan.

## 1. Relocation

- ➔ Identify alternate locations at which specific essential functions may be performed including the recovery time objective (RTO).
- ➔ Ensure guaranteed access to alternate location within an agreed upon time following initiation of continuity plan. This should allow time for set-up so work can begin within the recovery time objective.
- ➔ Develop procedures by which personnel will be notified in the event an incident requires activation of an alternate location.
- ➔ Identify activation and implementation procedures for relocation during business hours and non-business hours.
- ➔ Identify advance team and continuity team members that will deploy.
- ➔ List and document instructions to ensure that communication, infrastructure systems, and equipment are in place and operational.
- ➔ Document in-processing procedures including how to obtain the roster of continuity personnel.
- ➔ Create an alternate location activation checklist.

➤ *See Continuity Plan Template Table 13. Alternate Location Checklist*

## 2. Alternate Locations & Telework

### 2a. Space and Infrastructure Summary

When selecting an alternate location, it is important to know the total space and infrastructure requirements for the work to be conducted. These can be calculated in part by summing the requirements listed in the business process analysis (BPA) for each essential function. Additional things to consider include access to, or availability of:

- Backup generators;

- Equipment (such as computers, print/copy/fax, phones, specialized items);
- Bathrooms and break areas; and
- Residential accommodations and transportation.

➔ Determine and list needed features, space, infrastructure and resource requirements to conduct essential function work at an alternate location by reference of the business process analysis (BPA).

➔ Ensure guaranteed access to alternate location within an agreed upon time. This should allow time for set-up so work can begin within the recovery time objective (RTO).

An alternate location/facility MOA template is included in Continuity Plan Template Appendix D-1. An alternate location inspection template is included in Appendix D-2.

➔ List information about the alternate location/facility, including the address, points of contact, and available resources at the location. Maps, evacuation routes and driving directions, and available modes of transportation from the primary facility to the alternate location should be included.

➤ *See Continuity Plan Template Appendix D-3: Alternate Location/Facility Information, and Appendix D-4: Maps and Evacuation Routes*

## 2b. Access to Communications, Internet, and Remote Servers

➔ Identify and document the alternate location's provides communication and information technology infrastructure capacity and security features.

Ensure the alternate location provides sufficient infrastructure to ensure access to primary servers, backup storage, and the essential records database, including:

- interoperable communications, and connections;
- capabilities to access and use vital files, records and databases; and
- systems and configurations that are used to complete essential functions.

➔ Describe how staff will access the organization's primary servers, backup storage, and essential records database in the event these servers are lost. If remote access will be used to reach servers, ensure there are adequate licenses and that the internet speed will support timely transference of an appropriate volume of data.

➔ Determine where replacement phone and computer equipment will be stored ahead of time, or procured within the recovery time objective (RTO).

## 2c. MOUs and Agreements

➔ Clearly describe all security and site access requirements to ensure personnel are able to reach the site to begin work within the recovery time objective (RTO).

Maps and directions, including at least a primary and secondary route (in case a disruption renders the primary route inaccessible) should be included in the Continuity Plan Template Appendix D. Alternate Location/Facility Documentation.

## 2d. Maps, Directions, Security and Access

- ➔ Clearly describe all security and site access requirements to ensure personnel are able to reach the site to begin work within the recovery time objective (RTO).

Maps and directions, including at least a primary and secondary route (in case a disruption renders the primary route inaccessible) should be included in the Continuity Plan Template Appendix D. Alternate Location/Facility Documentation.

## 2e. Telework

In order to work remotely, it is usually necessary to have access to information on the organization's servers, backup storage sites, and/or vital files, records and databases. Each user must have a computer at home or remote site with adequate capabilities that meets the security requirements to access servers, and can interface with other systems as required to conduct essential functions.

There is a direct relationship between an organization's continuity plan and telework. The two programs share the basic objective of performing and maintaining an organization's functions in an alternative location and method. Telework can assist the sustainment of essential functions during a change in normal operating status, such as a pandemic or an incident that causes a building closure

When using telework as an option to support essential functions during a continuity plan activation, organizations should identify which functions can be conducted via telework, including evaluating the use of telework for supporting extended continuity operations and use by non-continuity personnel.

- ➔ Identify requirements for protection of information and information systems, providing access to essential records and communications, and equipment and technical support requirements for personnel identified as telework-capable.
- ➔ Coordinate with human resources to support continuing operations in a telework environment.
- ➔ Establish procedures for telework notification, activation and verification of functional capabilities.

## 3. Mission Critical Systems

This section should address the healthcare organization's critical systems necessary to perform essential functions and supporting activities. Organizations must define these systems and address the method of transferring/replicating them at an alternate site. Examples of critical systems include:

- Patient Care
- Triage
- Patient Movement
- Patient Tracking
- Medical screening
- Laboratory Services
- Hospital Command Center
- Medical billing

- ➔ Identify and list the organization's mission critical systems, their current location, alternate location, and describe the process for transferring or replicating them at an alternate location.

➤ *See Continuity Plan Template Table 7. Mission Critical Systems. Addition resource: Federal Healthcare Resilience Task Force Alternate Care Site Toolkit*

## 4. Vital Files, Records, and Databases

This section should address the healthcare organization's vital files, records, and databases which are necessary to perform essential functions and activities and to reconstitute normal operations after the emergency ceases. Information systems and applications, electronic and hardcopy documents, references, and records needed to support essential functions during a continuity plan activation should be categorized as essential records.

Essential records, are those that are vital to the continued functioning or recovery of the organization including those required for patient care, facility, business and administrative operations, and the legal and financial concerns of the organization and individuals. The large volumes of information and data created and managed by healthcare organizations, both in electronic and hardcopy form, are important, but not necessarily essential to the mission-critical operations of the organization.

Continuity programs should include comprehensive processes for identifying, protecting, and accessing electronic and hardcopy essential records at primary and alternate locations. Redundant data management software applications and equipment should provide the appropriate level of access and cybersecurity to protect sensitive and personally identifiable information, including adhering to HIPAA.

➔ List the vital files, records and databases identified as critical to supporting the essential functions.

Include information about:

- the format of the file and how it is accessed;
- whether it is available at an alternate facility; and
- where and how to access back-ups of the files.

➤ See Table 8. *Vital Files, Records and Databases*

## 5. Vital Systems and Equipment

Vital systems and equipment are very similar to the vital files, records and databases. Vital equipment refers to the equipment such as radios, computers, cell phones, pagers, etc. needed to support essential functions. List the vital system or equipment necessary to perform the identified essential functions and include information described below.

➔ Describe the vital system or equipment necessary to perform the essential functions.

- Identify where the equipment is stored.
- Identify the staff member or vendor that supports the vital system or equipment. Ensure contact information is included.

➔ Identify the Recovery Point Objective (RPO) which is when it must be operational again following a disruption of service (e.g. 1 day, 1 week, 1 month).

➔ Prioritize the vital systems and equipment. The shorter the RPO, the higher the priority.

➔ Identify any unique risks to which the vital system or equipment may be susceptible to flaws, outdated information, or damage.

➔ List the current protection method(s) in place for the system or equipment.

➔ List how frequently the vital system or equipment is maintained.

➔ Provide any recommendations for additional protection methods for the vital system or equipment.



➤ See Table 9. Critical Systems and Equipment

## C. Reconstitution

Reconstitution is the process by which personnel resume normal operations at the original or alternate facility. Organizations should identify and outline a plan to return to normal operations once senior management, or their successors, determine the disaster no longer poses a threat.

Reconstitution occurs on a spectrum with many variables. The decision to reconstitute should be based on:

- the availability of personnel;
- the safety of the primary facility or the availability of a new site;
- information technology and communication capabilities of the facility;
- fiscal concerns;
- equipment needed to conduct daily operations; and
- other issues that may arise.

Organizations that use a reconstitution plan that is separate from their continuity plan should reference that plan and include a summary of the information in this section. The referenced reconstitution plan should be designated as an essential record.

To the extent possible, individuals should not be assigned to both the continuity and reconstitution team, as both require significant time and effort, and the responsibilities overlap.

### C1. Procedures

➔ Assign responsibility, methods and criteria for assessing reconstitution

Consider the following:

- determining the status of the primary operating facility;
- conducting appropriate security, safety, and health assessments to determine building suitability;
- verifying that all systems, communications, and other required capabilities are available and operational; and
- determining time and cost estimates.

➔ Assign responsibility for determining that the organization is fully capable of accomplishing essential functions and operations at primary operating facility.

➔ Assess the status of personnel post-incident to determine their availability to return to work. Depending upon the incident, an organization may need to address physical and psychological impacts to personnel.

➔ Inform all personnel that the actual emergency, or the threat of an emergency, and the necessity for continuity operations no longer exists, and instruct personnel on how to resume normal operations.

➔ Establish a priority-based plan and schedule for phase-down at an alternate site and return of personnel, functions, and equipment to the primary operating facility.

➤ See Table 10. Reconstitution Checklist and Table 11. Reconstitution Team Responsibility Chart

## V. Readiness and Preparedness

### A. Planning Assumptions and Considerations

This section should list the planning assumptions upon which the continuity plan is based. The organization's risk assessments will help inform these assumptions.

### B. Planning

This section should delineate continuity plan responsibilities of continuity teams and each key staff position.

➤ See Table 12. Continuity Responsibilities and Assignments

### C. Testing, Training and Exercises

This section should address the organization's Test, Training, and Exercise (TT&E) Plan to:

- ensure staff members understand their roles and responsibilities;
- ensure systems and equipment are maintained; and
- validate certain aspects of the continuity plan.

The continuity planning team should consider snow days, power outages, server crashes, and other ad-hoc opportunities to assess preparedness. The continuity TT&E may be incorporated into the healthcare organizations multi-year plan or it can stand-alone.

➔ Conduct continuity awareness education for the entire workforce.

➔ Test alert and notification procedures.

➔ Test activation procedures.

➔ Test accountability procedures.

➔ Test interoperable communications capabilities that support identified essential functions.

➔ Test critical systems and equipment and strategies to meet associated recovery time objectives (RTOs).

➔ Test primary and backup infrastructure systems and services at continuity facilities.

➔ Test capabilities to perform essential functions including interdependencies.

➔ Test organization-wide continuity response including testing of mitigation options that support the continuance of essential functions.

➔ Test reconstitution plan or procedures for recovery and transitioning back to normal operations.

➔ Exercise with internal and external partners to coordinate continuity plans/programs.

➔ Establish a Corrective Action Program (CAP) to track and implement areas for improvement from tests, training, exercises and events.

## D. Multi-Year Strategy and Program Management

The Multi-Year Strategy and Program Management strategy may be developed as a separate document. This section within the continuity plan should describe how the organization plans to address short and long-term continuity goals, objectives, budgetary requirements, timelines, and planning milestones or tracking systems to monitor accomplishments.

➔ Develop multi-year strategic plan for maintenance and review of the continuity plan/program.

➔ Define short and long-term continuity goals and objectives.

Identify program concerns and potential obstacles, and strategies for addressing these.

➔ Designate and review essential functions and resources.

➔ Establish a schedule for the continuity planning team to meet.

➔ Forecast continuity budgetary requirements.

➔ Identify how continuity program will fund operations and acquire necessary resources to support the implementation of the continuity plan during a continuity event.

➔ Establish planning, training, and exercise activities and milestones for these activities.

➔ Develop metrics or success criteria to evaluate the continuity plan/program on a regular basis.

## E. Continuity Plan Maintenance

This section should address how the organization plans to ensure that the continuity plan contains the most current information. Federal guidance states that organizations should review the entire continuity plan at least annually. Key evacuation routes, roster and telephone information, as well as maps and room/building designations of alternate locations should be updated as changes occur.

Plan to involve community personal important to the plan maintenance or the supporting essential functions.

If you are testing evacuation routes involve the fire and police departments and train to ensure they have access to the facility including access badges, access to cameras and equipment. Include them in the regular training and exercises and in the MOU process for a better understanding of the facility needs.

➔ Establish a working group and schedule for review/revising of the continuity plan.

➔ Review and update business process analysis (BPA).

- ➔ Review and update risk assessments.
- ➔ Review and update the business impact analysis (BIA).
- ➔ Review and update orders of succession and delegations of authority.
- ➔ Review and update essential records and the essential records inventory, including emergency operating records and legal and financial rights records.
- ➔ Regularly update appropriate point-of-contact rosters of continuity personnel.

# Appendices

## Appendix A: Key Roles and Responsibilities

Key positions include the Continuity Coordinator, Continuity Team members, senior leadership and their successors, and others who are assigned continuity responsibilities.

### Leadership and Steering Committee

- Provide overall policy direction, guidance, and objectives for continuity planning.
- Provide necessary resources to support the implementation of the continuity plan and supporting activities.
- Ensure adequate funding is available for emergency operations.
- Ensure all units of the organization participate in testing, training and exercise activities.

### Continuity Planning Coordinator and Committee

- Provide strategic leadership and policy direction for the continuity program.
- Serve as the organization's continuity program point of contact.
- Implement the Continuity Plan when necessary, or when directed by appropriate leader.
- Maintain orders of succession and delegations of authority.
- Update continuity plan annually.
- Develop and conduct continuity training.
- Plan and conduct continuity exercises.
- Update telephone rosters monthly.
- Conduct alert and notification tests.

### Essential Records Manager

- Review status of essential records, files, and databases.
- Provide for proper storage and protection of essential records.

### Continuity Personnel

- Be prepared to deploy and support the essential functions in the event of continuity plan implementation.
- Provide current contact information to Continuity Coordinator.
- Be familiar with continuity planning and know individual roles and responsibilities in the event of activation.
- Participate in continuity training and exercises as directed.

- Have a telework agreement in place, if applicable.

### **Department Directors**

- Appoint a POC for coordination and implementation of the continuity plan.
- Keep Continuity Coordinator informed of changes in the designation of the department continuity POC.
- Identify essential functions to be performed when any element of the organization is relocated.
- Identify those functions that can be deferred or paused in the event the continuity plan is implemented.
- Maintain a current roster of continuity team members.
- Maintain current personnel emergency notification, accountability, and relocation rosters.
- Prepare backup copies or updates of essential records.
- Ensure that the time and attendance function is represented on the continuity team.

## **Appendix B: Steering Committee & Governance Responsibilities**

Organizations will apply their own models in developing, implementing and maintaining their continuity program and plan. Below are key planning elements and decisions which should be assigned to a group with responsibility for program governance and strategic decisions.

- Define project scope and establish objectives and milestones;
- Assess time/resource demands;
- Identify project costs; ensure budgetary support;
- Allocate knowledgeable personnel and sufficient financial resources to properly implement continuity plans and procedures;
- When conducting the business impact assessment (BIA) and developing business continuity plans, determine final objectives, use the data to inform strategic and financial decisions and decide which resources will be applied to the program;
- Establish policy by determining how the organization will manage and control identified risks;
- Determine procedures for information gathering and decision making;
- Determine who has authority to activate the continuity plan;
- Ensure that the continuity plan is reviewed and approved at least annually;
- Ensure employees are trained and aware of their roles in the implementation of the continuity plan;
- Review the continuity plan's testing program and outcomes on a regular basis; and
- Ensure the continuity plan is continually updated to reflect the current operating environment.

## **Appendix C: Risk Assessment**

Effective risk management practices and procedures will assist in accomplishing continuity objectives. Continuity of operations should be incorporated into the organization's risk management program and be part of its risk mitigation strategy. Organizational HVAs, external assessments and historical records and FEMA's Threat and Hazard Identification and Risk Assessment (THIRA) are among the tools to identify and analyze risks, determine acceptable levels and mitigate risk, and consider the associated costs and benefits.

These risk assessments inform the Business Impact Analysis (BIA) process. Key questions include:

- What are the threats and hazards that the organization faces?
- What are the characteristics of the threats and hazards (how may the threat and hazard affect the organization)?
- What is the likelihood of occurrence for the threat or hazard?
- What would be the overall risk value for the threat or hazard?

## Appendix D: Business Process Analysis

A business process analysis (BPA) is a systematic process that identifies and documents the activities and tasks that are performed within an organization. A BPA captures and maps the functional processes, workflows, activities, personnel expertise, systems, resources, controls, data, and facilities inherent in the execution of a function or requirement. An effectively conducted BPA supports the development of detailed procedures that outlines how an organization accomplishes its mission.

Performing a BPA should be approached systematically and with a focus on clearly describing the details regarding how each task and activity is performed. A detailed BPA will result in developing guidelines for performing essential functions.

A detailed BPA identifies and answers:

- What products, information, and equipment are required for this task, from both internal and external partners?
- What products, services, and information result from the performance of this task (including metrics that identify specific performance measures and standards)?
- Who in the organization's leadership is required to perform the task, if direct leadership involvement is needed?
- What staff internal or external to the organization is required to directly support or perform the task (including specific skill sets, expertise, and authorities needed)?
- What communications and IT software and equipment are required to support the task (including any unique or unusual requirements)?
- What are the facility requirements for performing the task (e.g., facility type, square footage, security, infrastructure required)?
- What supplies, services, capabilities (not already addressed) are required to perform the task (including the ability to obtain, purchase, and relocate these resources)? What are the funding sources?
- Who are the internal and external organizations that support or ensure task performance and what information, supplies, equipment, or products do they provide?
- From start to finish, how is the task performed?

## Appendix E: Business Impact Analysis (BIA)

A Business Impact Analysis (BIA) is a method of identifying and evaluating the effects that various threats and hazards may have on the ability of an organization to perform its essential functions and the resulting impact of those effects.

The BIA will help identify gaps, weaknesses, vulnerabilities and support identification and mitigation of vulnerabilities to ensure that an organization can perform its essential functions. Organizations should consider:

- What is the vulnerability of the essential function to each threat or hazard identified in the risk assessments?
- What would be the impact if the essential function's performance is disrupted?

- What is the timeframe for unacceptable loss of functions and critical assets?

Organizations should also consider cost because informed decisions about acceptable and unacceptable levels of risk will ultimately drive the commitment of resources, including money, people, and time, to mitigate risk.

Also important to consider are the interdependencies between and among organizations that share critical roles as part of essential functions.

## Appendix F: Essential Functions

Essential functions are the activities and tasks that cannot be deferred during an emergency; these activities must be performed continuously or resumed quickly following a disruption. A distinction should be made between essential and important functions. There are many important functions that can be deferred until after an emergency or disruption.

Conducting a comprehensive business process analysis (BPA) and business impact analysis (BIA) will help identify and prioritize essential functions. Not all of activities and tasks identified during the BPA can be done in an emergency or when resources are limited. The distinction is whether or not an organization must perform a function during the emergency or disruption.

Several factors should be included in prioritizing essential functions:

- Recovery time objective (RTO): How quickly must the task or activity resume?
- Impact if not conducted: What are the impacts of not conducting or delaying the performance of this task or activity? Does this function have interdependencies affect another essential function or an affiliated or partner organization's ability to conduct their essential functions?
- Leadership and management priorities: What do executive-level leaders deem essential to the organization's mission?
- Priorities may be situation-dependent: Consider variables that may change the priority or interdependency of a function?

Categorizing essential functions assists with prioritization of resources. The prioritization process involves a combination of objective and subjective decisions. Grouping functions into priority categories rather than a linear list may be a more effective approach.

## Appendix G: Resources

### [Continuity Planning: Importance of Executive Level Support \(PPT\)](#) [\(PDF\)](#)

This presentation may be adapted and used to describe the importance of executive level support for continuity planning. Presentation objectives include demonstrating the importance of executive support and the role of leadership, and the objectives and return on investment (ROI) of continuity planning.

### [Continuity Planning: Presentation Series for Healthcare Organization Leadership and Department Heads \(PPT\)](#) [\(PDF\)](#)

This is a series of five brief presentations which may be adapted to educate hospital leaders and department heads on the fundamental aspects of continuity planning. The presentations address:

- COOP Overview
- Planning Process
- Essential Functions & Business Impact Analysis (BIA)
- Governance & Project Management
- Project Management: Action Plan