Creating a Business Continuity Plan
for your Health Center

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About This Manual

- This tool is the result of collaboration between the Primary Care Development Corporation (PCDC) and the National Association of Community Health Centers (NACHC).

- It is intended to provide community health centers and primary care centers an easy to use tool to create and improve their business continuity plan and program.

- For assistance, questions or more information on this and other business continuity and emergency preparedness tools and resources, please contact PCDC (www.pcdc.org or 212-437-3900) or NACHC (www.nachc.org or 301-347-0400)

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The Importance of Business Continuity (BC)

At the time of the creation of this document in 2011, the year had already become forever etched in the collective memory as one punctuated by monster tornados, an East Coast earthquake followed in short order by a hurricane, a freak October snowstorm, and historic flooding. Although we can't control when and where events such as these strike, we can manage our health centers' ability to continue caring for our patients through effective business continuity planning.

Business continuity plans are critical in keeping a health center open to provide care for the community when it is most needed following an emergency or other disruption. The plan reduces the economic impact to the health center during a disaster and allows it to maintain its critical business and logistical functions. A solid business continuity plan also helps health centers recover and get back to 'business as normal' following an event more quickly and completely.

A Business Continuity Plan and Program is an ongoing process supported by senior management and funded by the organization. Critical processes that are necessary for the health center to continue services are identified, as well as how these processes will be maintained in adverse circumstances. Lastly, an effective business continuity process engages in a system of continuous training, testing and maintenance of the plan and program.

A comprehensive and well-constructed Business Continuity Plan will:

- Augment good will, as well as internal credibility with staff and external credibility with clients, vendors, and the community
- Encompass a thoroughly researched, all hazards effort to ensure capabilities are developed to maintain business operations before, during and after a disaster.
- Be communicated to the organization and obtain buy-in from Essential Stakeholders, such as Leadership and/or Senior Management (this is most important), as well as from Board of Directors, Staff, and Vendors.
- Include consideration of all financial implications to continue the income flow, maintain a level of service to the community and to keep Staff whole.
- Bear community interests in mind, by maintaining a level of service to the community. Disasters are the time when communities need their local health systems the most.
- Recognize the positive effect a business continuity plan has after a disaster on reassuring and retaining qualified staff that are trained as well as maintain institutional knowledge and patient loyalty.

Creating the Business Continuity Plan

A robust business continuity (BC) plan requires information on all aspects of the health center. Because of the detailed information needed from multiple departments, it is critical to approach the development and implementation of the business continuity plan with a multi-disciplinary team. When building the BC Team, it is important that they are able to work with and gather information from all the departments within the health center.

There are many scenarios that the BC Team will consider as they put the BC Plan together. These are some of common scenarios that could cause a Health Center to be inoperable:

1) Critical staff and/or vendors are unavailable or cannot be contacted
2) Facility or the local community area is not accessible
3) Equipment is not working at the Health Center
4) Software is ruined or not working due to hardware issues
5) Critical data and records are unavailable or destroyed
6) Utilities are down

The BC Team will work with each department to identify the processes they need to be able to function, and then prioritize which are critical. Plans will then be designed to insure that these "critical processes" can be maintained during and after an incident.

Business Continuity Plan Core Elements

While a business continuity plan can be customized to fit the needs of the health center, it should contain a few core elements. This section will introduce you to the core elements in most plans. Further details on each section can be found on the following pages.

Section 1.   Executive Summary

The Business Continuity program at the health center must be supported by the senior leadership. The Executive Summary commits this group to take responsibility for creating, maintain, testing and implementing this plan. This also sends the message that BC is an important management priority.

Section 2.   Business Continuity Planning Team

Identify the team members and contact information for the creation and maintenance of the BC plan. This can also reference the departments consulted or involved in its creation.

Section 3.   Hazard Vulnerability Analysis (HVA)

A hazard vulnerability analysis should be updated every year. Once completed, the HVA gives the health center a picture of the types of risks, and their likelihood, that may impact the business. This allows health centers to prioritize their efforts.

Section 4.   Business Impact Analysis & Summary

Identify processes needed for each department to maintain critical functions during a disruptive action, as well as how long each process can be suspended before the impacts on the health center become unacceptable. Resources needed to recover are also outlined.

Section 5.   Mitigation Strategy

Strategies for mitigation help health centers to lessen and / or prepare for the impact on their operations from disruptive actions.

Section 6.   Recovery Strategy

Strategies for helping health centers recover from disruptive actions and return to normal operations.

Section 7.   Plan Training, Drills & Maintenance

The BC Plan is like any other initiative to improve quality at a health center. It must outline a process to train staff, perform drills, and update and maintain the plan.

Plan Components:
Policies and Procedures

Executive Summary

An Executive Summary is found at the beginning of a Business Continuity Plan and includes key information, including:

- What a BC Plan is
- What is contained in the plan and how it was created
- Why the BC Plan is important to the health center
- Who is covered under the plan and, in general, when and how it will be executed
- Highlights the company commitment to continuity of business services during and after an incident
- Commitment to plan maintenance, training and drills

To have a successful program, it is imperative to have buy-in from the following groups:

- Leadership and/or Senior Management
- the Board of Directors
- Staff
- Vendors (i.e. Information Technology, Human Resources, Payroll Service).

Financial implications are usually a main motivator to keep your business operational during a disruption. These are some statistics that will help support buy in for the BC Plan:

- 25% of all small businesses never recover from a disaster
- Health centers lose on average $12,000 to $30,000 each day they are closed
- Statistics indicate that 50% of businesses which sustain interruptions of a week or more due to problems at the primary site never recover.

In addition, the results of a Hazard Vulnerability Analysis (HVA – see Section 4) also identify key risks that are important in motivating the health center to complete a BC Plan.

See Appendix B – Executive Summary Template

Business Continuity Team

The Business Continuity Team (BCT) is a group of various staff members that lead the research and build the Business Continuity Plan. The BCT will review the finished Business Continuity Plan with all departments and the organization to ensure accuracy and is often the team that is maintained to train, drill, review and update the completed plan.

The Team should be comprised of staff members from various departments. Ideally, there should be one staff member representing each department of the organization. The BC Team may also be made up of an existing Emergency Preparedness Committee.

Ensure that there are members representing Medical, Clinical, and Administration functions, as well as Health Information Technology, Facility Operations, Finance and Accounting, Human Resources and other business units in the organization.

At smaller health centers, it may not be practical to have a member from each department. In this case, individuals from specific departments may be asked to attend specific meetings where their input is necessary.

Hazard Vulnerability Analysis

A Hazard Vulnerability Analysis (HVA) is one of the principle tools in emergency planning for hazard mitigation planning. Is a formal process for identifying hazards and the direct and indirect effect these hazards may have on your agency. The results of your facility's HVA will guide your facility's emergency planning.

The Hazard Vulnerability Analysis (HVA) is a tool for health centers to identify:

- Which hazards are most likely to affect our site?
- What is the expected impact of the hazard?
- What impact will our current mitigation measures have on our risk?

This information gives the site a snapshot of the collective "risk" each hazard poses for the health center. The higher the risk number, the more focused the effort to mitigate and plan for the event.

Health centers use local and regional data to inform the information used in the HVA. This can include historical data from city and state emergency management, weather data, flood plain mapping, and other sources.

Business Impact Analysis

The Business Impact Analysis (BIA) is a detailed study of all the business processes within the organization, department by department. Each department's processes are then analyzed to give the team a complete picture of health center critical (and non-critical) operations. There will be overlap, on occasion, from one process to another and this should be noted in the analysis.

It is both necessary and helpful to create directions on how to perform the different processes especially if they require specific steps. It is also important to understand any regulatory and legal requirements that apply to your specific health center such as processes that have to be maintained in a disaster or specific requirements to operate your health center at an alternate location.

A **Process** is a systematic series of activities that produce a specific outcome. Processes should be divided into two separate areas: Critical and Non-Critical:

1) **Critical Processes** are essential functions that are important to the mission of the organization and must be maintained during an emergency event (*Is it essential today to keep the business open?*). An example of a critical process is patient registration.
2) **Non-Critical Processes** play an important function to the organization but not essential during an emergency event to keep the business open. An example of a non-critical process is scheduling routine patient visits.

See Appendix C – Health Care Processes Sample List

There are two things to consider when reviewing your Processes: **Time and Data**:

1) **Time** is analyzed to determine what the acceptable amount of downtime is before this function must be operational.
   a. **Recovery Time Objective** is the maximum time and minimum service level allowed to restore a process following a disruption
2) **Data** analysis gives you what amount and type of data must be available so that you can still be open for business without severely impacting the business operations.
   a. **Recovery Point Objective** is the maximum period of time that data may be lost from an IT service due to a disruption

A plan should be create for each critical process to be maintained, within the limits of time and data identified by the BC Team.

Business Impact Analysis Report Summary

Your organization should write a report, based on the findings of the Business Impact Analysis you have done within each department, which summarizes the key findings. It is advisable to share the report with the different departments to ensure accuracy.

Once the report is complete, distribute to senior leadership to show the work that has been done and the outcome of the analysis. The report will describe the critical processes within your organization and the equipment, tools and staff required to ensure these processes become live as soon after a disruption as possible to keep your business moving forward.

It is helpful to have a **Business Impact Analysis Report Summary** that will direct you on the critical information, staff, equipment and tools needed in a disruption. If an emergency occurs, this will be easier to utilize than reading through the report. The BIA Report Summary will list important criteria by groups, such as BC Team, Senior Leadership and Vendors contacts along with resources needed to operate the business. The summary can include:

- Critical Business Processes and their priority level (e.g. low, medium, high)
- List the names and contact information of the Business Continuity Team
- List the names and contact information of the Senior Management Contacts
- Create a summary of Resources identified in the BIA process that are needed to continue doing business within the critical processes. This can include quantity, information on back-ups, location, ID#, etc.
- Create a list of contact information for Key Contacts, Vendors and Suppliers as well as back ups

Mitigation Strategy

Once you have completed the Business Impact Analysis on all the departments within the Health Center and have completed both the BIA Report and BIA Summary, you will see where you should protect your business assets to prevent or minimize downtime in a disruption.

The BC Team should look at creating mitigation strategies and procedures, protection and backups for the Health Center, such as:

- Internal and external structure reinforced at the physical site
- Ensure fire detection and suppression systems are current and operable
- Develop redundant third-party support
- Develop back-up systems and procedures for computers and software

Develop mitigation strategies and procedures that support business processes of the Health Center:

- Procedures to incorporate appropriate inventory of critical equipment
- Maintain adequate supplies of water, non-perishable food items, batteries, medical supplies
- Develop offsite backup systems for data, critical software, and facilities
- Develop disruption alternatives for:
  - o Power
  - o Communications
  - o Data and records, and recovery of information
  - o Facility
  - o Staffing

It is also helpful to define a Mitigation Policy for the health center to identify and guide the strategy for accomplishing these activities. This policy should outline the importance of mitigation (and the health center's commitment to furthering it), and include a list of mitigation measures, the party responsible for overseeing its completion, and a timeframe for completion.

Recovery Strategy

In a disruption, your Health Center will need to respond as quickly and efficiently as possible to maintain business operations. There are disruptions, however, that will force the Health Center to maintain business practices by focusing on just the most critical processes to keep an income flow to the business. Procedures should be in place, prior to an event, which identify critical processes from your BIA, mitigation measures as well as response and recovery actions to take.

In general, the disruptions to your business will fall into one or more categories:

- Facility
- Equipment
- Staff
- Technology

Procedures can be developed for different disruptions that should cover almost any situation that your business may encounter. **Disruption Action Plans** should be developed to create an action plan to respond and recover from an event as effectively and efficiently as possible. The individual Business Impact Analysis forms will assist in the recovery strategy to keep the business open, even if only marginally. Ensure that there is a current inventory of the critical assets required to enable business processes to continue.

It is also helpful to list all the equipment you have in your Health Center, with pertinent information necessary to make service calls quickly in a disruption.
1) Equipment – list the type of equipment and location
2) Serial Number/Key/License – enter the appropriate identification numbers for the equipment
3) Company – vendor / manufacturer
4) Warranty – enter warranty expiration date of if no warranty, enter "n/a" for not applicable
5) Service contract / Vendor – enter company name and contact information
6) Notes – and additional information

See Appendix E – Disruption Action Plan Template

Plan Sustainability

Part of the Business Continuity Plan must be a commitment to sustain the work the team has done. This should be incorporated in to a policy that includes:

- Identify the BC Team who will be responsible for sustaining the BC Plan after it is completed
    - This should include a Senior Leader "champion" who can assist when necessary to maintain BC efforts
- Who is responsible, and how frequently, should the plan be reviewed
    - What events (drill, actual disruption, etc.) would trigger a review of all or part of the plan outside of the normal review schedule
- How staff will be trained on the plan including frequency of training, who is responsible for overseeing the training, and which staff will be trained on specific topics
- How staff will be drilled on the plan including frequency of drills, who is responsible for overseeing the drills, and which staff will participate in specific drills

It is critical early on that the BC Team set dates, times and topics for BC trainings, drills and BC Team meetings to review the plan so that it can be incorporated in to the normal schedule of operations at the health center. Also, by making this part of the actual BC Plan that Senior Leadership will sign off on, it helps to insure their commitment to sustaining the work of the team.

Teams should also track the changes made in the business continuity plan. Sites can choose a method that works for them, however two methods that may work are:

1. Keep a page listing changes and updates at the front of the business continuity plan. It should include the policy name, date of change, and summary of changes.
2. In each policy heading, keep a space entitled "Last Updated" and record the date of the last set of changes.

Appendices

Appendix A – Key Terms

	Key Terms
Business Continuity	The capability to continue essential business processes under all circumstances.
Business Continuity Plan	Well researched, all-hazards effort to ensure capabilities are developed to maintain business operations before, during and after a disaster. Consists of a business impact analysis (BIA), threat analysis (HVA), and impact scenarios.
Business Impact Analysis (BIA)	The process of identifying and quantifying the impacts of an emergency or disaster in both financial and non-financial terms on an organization. It considers essential critical processes that are required to conduct business during an emergency event.
Critical Process	Essential functions that are important to the mission of the organization and must be maintained during an emergency event.
Emergency	A condition of disaster or of extreme peril to the safety of persons and property caused by natural, technological or man-made events that may have a quick or slow onset.
Emergency Management Plan (EMP)	The plan that each organization has and maintains for responding to hazards. Also called Emergency Operations Plan (EOP).
Executive Summary	Demonstrates the Business Continuity Plan is an ongoing process supported by senior management and is funded by the organization. It is usually the introduction to the plan.
Hazard	A potential or actual force with the ability to cause loss or harm to humans or property.
Hazard Vulnerability Analysis (HVA)	An event-focused, systematic approach to identify, assesses, and prioritizes each hazard that may affect a community to show vulnerabilities. The vulnerability is related to both the impact on the organizational function and the likely service demands created by the hazard impact.
Process	A systematic series of activities or tasks that produce a specific end.
Risk	The effect of hazard combined with vulnerability.
Vulnerability	How susceptible resources are to the negative effects of hazards including the likelihood of a hazard occurring and mitigation measures taken to lessen the effects of hazards.

HEALTH CENTER NAME

Executive Summary

The Business Continuity Plan (BCP) for Healthcare Center has been developed to address what is necessary to resume business operations as quickly and efficiently as possible after an emergency event. The Healthcare Center has determined the need for a comprehensive BCP which includes:

- Top Reason #1
- Top Reason #2
- Top Reason #3
- Top Reason #4 (optional)
- Top Reason #5 (optional)

Both a Business Impact Analysis and All-Hazards planning approach have been used as the foundation of the plan. This BCP supports Healthcare Center efforts to prepare and maintain all business functions and related items (i.e. equipment, supplies, records) necessary to support healthcare operations in the event of an emergency. This BCP allows each staff member and business department to be prepared for all emergencies that may occur, including natural, technological or human induced disasters.

The administration requires the active cooperation and commitment from all departments and employees in the preparation and maintenance of the plan. The BCP is to be incorporated into job duties at all levels, and staff will be trained and exercised accordingly in order to support the Plan. Further, staff response will become incorporated into overall job performance evaluation, and an ongoing dialogue and feedback on the matter will be encouraged. This will ensure a successful implementation of the plan, if ever warranted.

Healthcare Center Senior Leadership and the Board of Directors support the Business Continuity Plan in the promotion of diligent mitigation and efficient response as well as maintaining and resuming business operations to the community as soon as possible after an emergency.

_____   _____
CEO / Executive Director / etc.   Date

_____   _____
Chair, Board of Directors   Date

Appendix C – Health Care Processes Sample List

Health Care Processes – Sample List

- Legal and Regulatory Requirements

- Clinical
  - Patient Care
  - Customer / Patient Service
  - Clinical Orders
  - Protocols
  - Treatment Plans
  - Clinical Decision Support
  - Medical and Clinical Documentation

- Financial Accounting
  - Insurance Claims Processing
  - Account Receivable
  - Accounts Payable
  - Health Care Center Insurance

- Administration
  - Scheduling
  - Registration
  - Documentation of Patient Encounters
  - Patient Records Management
  - Procurement
  - Inventory
  - Supply Chain Processes

- Human Resources
  - Payroll
  - Staffing

- Information Technology
  - Hardware
  - Software
  - Back ups
  - Communications: online , wireless, POTS, PBX

- Facility Maintenance
  - HVAC
  - Utilities
  - Housekeeping

- Data Warehousing
  - Medical Treatment Results
  - Lab Data
  - Billing Data
  - Patient Files

Appendix D – Business Impact Analysis Template

<p style="text-align:center; color:red; font-weight:bold;">HEALTH CENTER NAME</p>

Business Impact Analysis Form

Department: _____

Business Process: _____

Type: ❑ Critical Process ❑ Non Critical Process
Priority: ❑ High ❑ Medium ❑ Low

Description: _____

Number of Patients and/or Staff Affected: _____

Employee(s) in charge: _____

Process Information

Recovery Point Objective: Time: ❑ ___ Hours ❑ ___ Day(s) ❑ ___ Week(s) ❑ ___ Month(s)
Recovery Time Objective: Time: ❑ ___ Hours ❑ ___ Day(s) ❑ ___ Week(s) ❑ ___ Month(s)
Service level: _____

Is this function a grant deliverable? ❑ No ❑ Yes – Which grant(s)? _____
Is this function required by law/regulation? ❑ No ❑ Yes – Which governmental agency? _____

Resources Required for Resumption and Recovery

- ❑ Personnel: _____
- ❑ Vendor(s)/Outside Provider(s): _____
- ❑ Key Contact(s): _____
- ❑ IT hardware and software: _____
- ❑ Records (electronic or paper): _____
- ❑ Medical equipment: _____
- ❑ Medical supplies: _____
- ❑ Facility/office space: _____

Plan for short term (< 3 days) disruption:

_____

Plan for long term (> 3 days) disruption:

_____

Appendix E – Disruption Action Plan Template

<div align="center">

HEALTH CENTER NAME

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Disruption: Define the Disruption

Date:	Revision:

Risk	Define the Disruption (same as above)
Probability	Low Medium High
Impact	Low Medium High
Likely Scenario(s)	
Critical Processes Affected	
Action	
Responsibilities	
Resources Required	