

Business Continuity Plan

Practice
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Business Continuity Plan Change Documentation

Change summary	Version	Author	Date
	1.0		
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1.0 Introduction

The goal of the all-hazards approach to a business continuity plan (BCP) is to maintain the ability of to operate and provide essential services regardless of the emergency. This approach includes preparing for emergencies ranging from natural, human-caused, technologic, and others.

To have a successful BCP for a medical practice, it is imperative to have buy-in from the following groups:

- Leadership and/or Senior Management
- Any Board of Directors
- Senior Staff
- Vendors (eg, Information Technology, Human Resources, Payroll Service)
- Business Continuity Team (See Appendix B: BCT Roles)
- Heads of Departments:

The business continuity team (BCT) is a group of staff members who lead the research necessary to develop an initial BCP, which they will review with all departments and the organization to ensure accuracy. The BCT is a team that is maintained to review and update the completed BCT at regular intervals.

The BCT is comprised of staff members from various departments. Ideally, there should be one staff member representing each department of the organization. The BCT may also include members of an existing emergency preparedness committee.

We have ensured that there are members of or consultants to the BCT representing medical, clinical, and administration functions, as well as health information technology (HIT), facility operations, finance and accounting, human resources and other business units in the organization.

Execution of the BCP is guided by the checklist of activities listed in Appendix A: BCP Implementation Checklist. The remaining sections of this plan provide additional planning information used in the development of the business continuity plan.

1.1 BCP Purpose

All functional areas within have the responsibility to plan for and respond to emergency situations that prohibit normal operation of the organization for any period of time, whether by 2 hours or 1 month or more.

During an emergency event, personnel may be required to operate from a continuity location and may seriously overextend available resources. The BCP is designed to ensure essential functions can be maintained throughout a variety of incidents and emergencies.

This BCP also provides guidance for personnel to implement actions to continue essential functions within their intended recovery priority time-frames and to maintain mission-essential functions for up to 30 days in an alternate environment is committed to the safety and protection of its patients, employees, visitors, operations, and facilities. This BCP provides personnel a framework that is designed to minimize impact of emergency incidents.

1.2 Business Continuity Plan Outline

This BCP consists of the following sections:

1. *Introduction*: Provides an overall description of the BCP planning assumptions, authorities and references, and hazards that would likely trigger BCP activation
2. *Concept of Operations*: Describes the components of continuity of operations and outlines the methods and processes in place for BCP activation
3. *Appendices*: Checklists and forms detailing what will be done and by whom if BCP is activated with necessary contact information.

2.0 Concept of Operations

A BCP must be maintained at a high level of preparedness and be available for implementation without significant warning and no later than 12 hours after activation (See Appendix A:BCP Implementation Checklist). A BCP should provide guidance to sustain operations for up to 30 days. The broad objective of the BCP for is to provide for the safety and well-being of our employees and patients. In addition, this plan will facilitate the performance of essential functions during any crisis or emergency in which one or more organization locations are threatened or not accessible. Specific BCP objectives include the following.

- Enable staff to perform mission-essential functions to prepare for and respond to all threats or emergencies, including terrorism, technological catastrophes, natural or human-caused disasters, and other crises.
- Enable staff to perform mission essential functions caused by the following:
 - o Closure of a facility (eg, damage to a building)
 - o Reduced workforce (eg, due to severe weather that prevents driving)
 - o Technological equipment or systems failure (such as IT systems failure)
- Identify critical employees and supporting staff that will relocate or work from home
- Ensure the continuity locations can support essential functions.
- Protect and maintain vital records and critical systems.

An emergency, such as an explosion, fire, or hazardous materials incident, may require the evacuation of one or more locations with little or no advance notice. Building evacuation, if required, is accomplished via implementation of the standard emergency procedures for each location. This BCP is neither an evacuation plan nor an emergency operations plan.

2.1 Business Continuity Plan Operational Periods

Operational concepts presented in this section are applicable at all times. In some instances, emergencies may be preceded by a warning period. If this warning is recognized in time, there can be sufficient time to warn the staff and implement mitigation measures designed to reduce the impact of the emergency. However, often an emergency occurs with little or no warning, requiring immediate activation of the BCP plan and commitment of resources.

The BCT and individuals listed in Appendix B: BCP Roles are responsible for managing the BCP program during each of the following four operational periods:

1. Readiness and preparedness: ensuring that the organization and contingency plans are as ready and prepared as possible to react to a disaster situation.

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2. Activation and relocation: guiding the initial response to a disruptive incident, with a focus on alert, notification, and relocation.
3. Continuity operations: restoring essential functions by implementing orders of succession, delegations of authority, or interim processes (for example, due to lack of network connectivity), and identifying and outlining a plan to return to normal operations once leaders determine that reconstitution operations can begin.
4. Reconstitution: restoring all functions to normal operations at the original or replacement primary facility.

2.2 Business Impact Analysis and Reporting

2.2.1 Business Impact Analysis

The business impact analysis (BIA) is a detailed study, department by department, of all business processes within . Each department's processes have been analyzed to give a complete picture of (critical and non-critical) operations (See Appendix C: Business Impact Analysis). There is occasional overlap from one process to another, which is documented.

It is necessary and helpful to create step-by-step directions on how to perform each of the different processes. It is also important to understand and include any regulatory and legal requirements that apply to any specific practices, such as processes that have to be maintained in a disaster, maintenance of patient privacy, or specific requirements to operate the practice at an alternate location. These are documented in our practice manual, a copy of which is kept with this BCP.

A process is a systematic series of activities that produce a specific outcome. Processes are divided into two separate areas: critical and noncritical:

1. *Critical Processes*: essential functions that are important to the mission of the organization and must be maintained during an emergency event. If the answer to the question, "Is the process essential today to keep the business open?" is yes, the process is critical (for example, patient registration).
2. *Noncritical Processes*: important functions for the organization but are not essential during an emergency event to keep the business open. An example of a noncritical process is scheduling routine patient visits.

There are two things to consider when reviewing processes

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

A continuity plan has been created for each critical process to be maintained, within the limits of time and data identified by the BC .

2.2.2 Business Impact Analysis Report and Summary

The BCT has written a report summarizing the findings of the BI for each department and shared it with the BCT team member or liaison from each department before finalization and distribution to ensure accuracy .

The complete report is distributed to senior leadership to show the work that has been done and the outcome of the analysis. Critical processes within are identified, as are the equipment, tools, and staff required to ensure these processes become live as soon after a disruption as possible to keep us open for business and moving toward normal operations as quickly and safely as possible.

The BIA report summary provides all stakeholders with critical information, staff, equipment, and tools needed in a disruption. If an emergency occurs, this is easier to use than the full report. The BIA report summary lists important criteria by groups, such as BCT, senior leadership, and vendors contacts along with resources needed to operate the business. (See Appendices B, D, and E) The summary includes the items listed below.

- Critical business processes and priority levels (eg low, medium, high)
- A list of names and contact information for BCT members (See Appendix B: BCP Roles)
- A list of names and contact information for senior management (See Appendix E: Communication contact list)
- A summary of resources, identified in the BI process, that are needed to continue doing business within the critical processes, which may include quantity, information on back-ups, location, ID numbers, and more (See Appendix D. Critical Process Resources and Back Ups)
- A list of contact information for key contacts, vendors and suppliers as well as back ups (See Appendix F: Minimum Site Requirements)

2.3 Mitigation Strategy

The BIA, BIA report, and report summary are used to develop mitigation strategies and procedures including protection and backups for the practice and include the following items.

- Ensuring fire detection and suppression systems are current and operable
- Developing redundant third-party support
- Developing back-up systems and procedures for computers and software
- Creating procedures to incorporate appropriate inventory of critical equipment
- Securing important papers/documents at the end of the day
- Ensuring all critical data files are backed up via the network backup methods (not on individual computer hard drive)
- Maintaining accurate inventories of stockpiled supplies
- Cross-training employees to assume roles for key employees
- Training personnel on executing the BCP plan
- Testing system backups/restore processes
- Testing building alarm systems
- Posting evacuation plans
- Designating staff to ensure evacuation occurs
- 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 Staffin

Our mitigation policy identifies and guides the strategy for accomplishing these activities, outlining the importance of mitigation (and the commitment to furthering it), and includes a list of mitigation measures, the party responsible for overseeing each activity completion, and a timeframe for completion.

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The BCT will make recommendations to leadership regarding the preparedness efforts that should be conducted.

Another key item to maintain during this phase is drive-away kits, which are prepackaged, up-to-date kits containing equipment, reference material, personnel items, and logistical support items needed to perform mission-essential functions of resources in the event online resources are not available. Even with a well-equipped continuity location, driveaway kits may be required to transfer up-to-date data and other critical information and equipment.

The BCP drive-away kits will comprise only those essential items that cannot be effectively maintained in automated or paper format at a continuity location.

2.3.1 Activation and Relocation Phase

This period of the BCP implementation begins once a declared state of emergency or a major disruption to mission-essential functions exists. The BCT is responsible for executing the BCP implementation checklist (See Appendix A: BCP Implementation Checklist) detailing specific tasks to be assigned during the response, stabilization, and recovery stages. The activation and relocation phase occur after a disruption to business processes triggers the implementation of the BCP plan. Two types of activation exist.

- Activation without relocation
- Activation with relocation

Relocation is triggered by unsafe conditions at a primary location or infrastructure issues (for example, loss of utilities or network connectivity for an extended duration) that would make the site unusable. Activation without relocation can be triggered by personnel issues (for example, pandemic flu) or a facility-wide IT outage. Activation includes emergency response, if necessary. Other phase activities (eg, assessing the effects of an incident) must occur before restoration of essential functions. If relocation is necessary, initiating alternate location activities would also occur during this phase (See Appendix F: Minimum Site Requirements).

The BCP Activation Team must notify personnel of BCP events that occur with and without warning and during business and nonbusiness hours. Consider the following:

- With warning: under some circumstances, a warning will occur at least a few hours before an event, allowing for partial BCP activation, with complete and orderly notification and deployment of key personnel
- Without warning: the ability to contact personnel after an event that occurred with little or no warning depends on the severity of the event and the disruption to the communication structure of
- Nonbusiness hours: if the primary facility is rendered inoperable or unsafe, key personnel will be notified and deployed to a designated alternate location, whereas nonessential personnel will be instructed to stay home and await further instructions
- Business hours: If the primary facility is rendered inoperable or unsafe during business hours, all personnel will be immediately evacuated from the building, and key personnel will be deployed to the designated partner's home location, whereas nonessential personnel will be instructed to go home and await further instructions

2.3.2 Continuity Operations Phase

Activities in the continuity operations phase focus on restoring essential functions. Declaring an "all clear" condition indicates that the incident has ended, and business functions can be resumed, possibly from a continuity location. This phase includes the following activities to continue essential functions.

- Accounting for all personnel
- Performing essential functions
- Establishing communication with supporting and supported organizations and stakeholders
- Preparing for the reconstitution of all functions

2.3.3 Reconstitution

Reconstitution is the process of restoring business operations to their normal, or improved, state of affairs. This phase is initiated once all essential functions have been restored. A reconstitution plan is developed after BCP activation to support the required recovery actions based on the situational specifics of the disaster.

Actions associated with reconstitution include:

- Restoring nonvital services and reconstruction in damaged areas
- Informing all personnel that the actual emergency (or threat of emergency) no longer exists
- Instructing personnel on how to resume normal operations
- Supervising either an orderly return to the normal operating facility, a move to another temporary facility, or a move to a new permanent operating facility
- Verifying that all systems, communications, and other required capabilities are available and operational and ensuring that the organization is fully capable of accomplishing all essential functions and operations at the new or restored facility
- Conducting an after-action review of the effectiveness of the BCP plan, identifying areas of improvement, documenting identified areas of improvement in Insert Practice ame corrective action plan, and developing a remedial action plan as soon as possible after reconstitution
- Identifying which (if any) records were affected by the incident, and working to ensure an effective transition or recovery of vital records and databases and other records that had not been designated as vital records

2.4 Mission-Essential Functions

Mission-essential functions enable the provision of vital services to staff and patients of _____ and form the basis for this BCP. The level and manner of support needed to continue mission-essential functions is dependent upon the nature of an event. A prioritized listing of the organization's essential functions contact template is shown in Appendix D: Essential Vendors Worksheet. This includes functions such as phone, utilities, internet, EHR, and IT.

2.5 Succession of Leadership

Orders of succession ensure that leadership of _____ is maintained when key personnel are unavailable during an emergency event

Order of Succession			
Key personnel	Successor 1	Successor 2	Limitations

2.6 Continuity Location Operations

_____ recognizes that normal operations may be disrupted and that there may be a need to perform mission-essential functions at alternate continuity locations.

_____ location is available to continue operations of for up to ____ days.

If there is no continuity operations location identified above for _____ during a limited interruption of 30 days or less, with the exception of some key personnel with the ability to work from home as defined in the Essential Functions detailed in Appendix C: Business Impact Analysis, _____ will cease most operations until the primary location is fully operational.

2.7 Communications

Interoperable communications, or the ability for personnel to communicate internally and externally, is critical during emergencies. The organization has made every effort to ensure that multiple modes of communication such as mobile phones, land lines, web sites, email, text, and other options are available during an emergency. Also, access to critical information systems that are used to accomplish mission essential functions during normal operations from the primary facility must be available at their designated continuity location. Generally, incoming phone calls will be rerouted to the answering service. Faxes will not be rerouted. Make a list of everyone in your practice along with contact information to include email and phone number(s). If the power is down and/or the office computers are not accessible, it is necessary to have a backup hardcopy of the contact information of everyone in the practice. See Appendix E: Communication Contact List.

3.0 Appendices

See pages 10-17.

Appendix A: BCP Implementation Checklist

- Notify employees of BCP activation.
- Conduct evacuation and account for all personnel
- Contact emergency responders, if necessary
- Assess/Document status of essential functions
- Assess communication plan with patients
- Contact utilities and other mission critical function vendors as needed
- Evaluate and document immediate staffing levels
- Assess need to close down unit and/or relocate services
- Communicate facility closure status to both employees and patients

Appendix B: BCP Roles

Business Continuity Development Team			
Name	Position	Phone	Email

BCP Activation Team			
Name	Position	Phone	Email

Appendix C: Business Impact Analysis

Complete one worksheet for each essential function in your department.

Essential Function			
Brief Description <i>What is this function responsible for? What does it accomplish?</i>			
Priority Rating + RTO <i>RTO =Recovery Time Objective (Maximum time this function can be down before significant problems would occur)</i>	Rating	Description	RTO
	<input type="checkbox"/> Critical	Directly impacts life, health, safety, or security. Cannot stop.	< 4 Hours
	<input type="checkbox"/> High	Must continue at normal or increased level. Pausing for more than 24 hours may cause significant consequences or serious harm.	<24 hours
	<input type="checkbox"/> Medium	Must continue if at all possible, perhaps in reduced mode. Stopping for more than one week may cause major disruption.	<1 week
	<input type="checkbox"/> Low	May be suspended for up to one month without causing significant disruption.	<1 month
	<input type="checkbox"/> Deferrable	May pause and resume when conditions permit.	>1 month
Key Personnel for this function	Primary: Alternate: Alternate:		
Key Roles required to perform the function <i>(Admin Asst., RN, manager, financial analysis, etc.)</i>			
Vendors vital to this function			
RESOURCE REQUIREMENTS			
Required Products and Services	<input type="checkbox"/> Network Services <input type="checkbox"/> Email <input type="checkbox"/> Telecom <input type="checkbox"/> VPN <input type="checkbox"/> EHR Others:		
Required Applications			
Required Rooms/Facilities			
Vital Records and Private Information			

DEPENDANCIES and PEAK PERIODS	
<p>Upstream Dependencies Other departments vital to this function that you rely on.</p>	
<p>Downstream Dependencies Other departments that rely on this Function</p>	
<p>Peak Periods Significant or demanding time for this function</p>	
CONTINUITY PLANNING	
<p>How will upstream dependencies be met?</p>	
<p>How will critical downstream dependencies be delivered?</p>	
<p>What backup resources will be needed?</p>	
<p>Peak Periods Significant or demanding time for this function</p>	

Appendix F: Minimum Site Requirements Worksheet

Instructions: Complete the worksheet below to document your minimum site requirements if you needed to find alternate space.

Minimum Site Requirements Worksheet		
Space	Minimum Required	Comments / Notes
Total square footage		
Size of waiting room		
Size of reception area		
Individual exam rooms		
Private offices		
Storage rooms		
Clinical staff work space		
Support staff work space		
Other specialized rooms		
Other space		
Specialized equipment		
Specialized supplies		
Other helpful information:		

Appendix G: 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
Hazard	A potential or actual force with the ability to cause loss or harm to humans or property.