

Healthcare Business Continuity Challenges and Solutions

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Agenda

- **Overview**
- **Requirements**
- **Planning baseline**
- **Challenges**
- **Solutions**
- **Demo**
- **Future considerations**
- **Questions**

Overview

- Business Continuity and Continuity of Operations Planning has been in place for a very long time, depending on industry
- Requirements vary, but for healthcare there is an increasing focus on planning for continuity of operations beyond response activities

Overview

- Depending on your organization or facility, responsibility for COOP or BCP planning may or may not be a defined role (this has pros and cons)
- There is an overlap with an existing and often long-standing BCP/COOP plan in the IT sector
- This has been made even more complicated by NHPP coalition-based requirements, coupled with CMS



Requirements

- Up until recently there have been few in the the healthcare sector:
 - “shall have an emergency plan...”
 - “the plan shall address the following...”
 - “hazards-based risk assessment...”
- CMS guidelines have changed all that:
 - “In addition to the facility- and community-based risk assessment, continuity of operations planning generally considers elements such as: essential personnel, essential functions, critical resources, vital records and IT data protection, alternate facility identification and location, and financial resources.”

<https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertEmergPrep/Downloads/Advanced-Copy-SOM-Appendix-Z-EP-IGs.pdf>

Requirements

- While CMS was one of the first to explicitly refer to COOP planning, this has been in the works for some time and the EM community as a whole has been anticipating it
- An organization-based or facility-based COOP or BCP plan may be sufficient now, but this is NOT an Emergency Operations Plan

Planning Baseline

- Healthcare has done a solid job of developing, building and updating their Emergency Operations Plans
- EOPs generally cover an entire facility or sometimes an entire organization with facility-specific information
- EOPs are then often accompanied by incident-specific annexes



Planning Baseline

- The operational aspects of an EOP are contained in several areas (generally):
 - Incident-specific annexes
 - Job Action Sheets
 - Separate response guides
- Departments included in these annexes/guides are not all-inclusive for the facility or organization
- These aspects of a plan may or may not drill-down to a department level, and if they do they are not in a relational database but often in word or PDF

Challenges

- Realistically a COOP or BCP plan must address the following:
 - Demographic information
 - Baseline risk
 - Lines of succession
 - Critical functions
 - Key requirements
 - Recovery strategies

Challenges

- The best-practices for COOP or BCP planning cannot be met if the same approach for completing/updating and EOP is taken
- COOP and BCP planning takes it down to another level below the organization and facility, it has to involve the DEPARTMENT
- This means that the scope for development and maintenance extends beyond the Emergency Manger or the EM Committee

Challenges

- So how do we accomplish this?
 - Senior-level buy-in
 - CMS and other requirements help this
 - Department Manager participation
 - Time/effort for all parties
- Once all is said and done, who maintains this? Who keeps track of it and holds everyone accountable?

Solutions

- Realistically there are at least three critical requirements to solve the COOP or BCP challenges:
 - Senior-level commitment
 - Time and Effort (can vary)
 - A manageable method to collect and maintain this information

Solutions – Senior Level Commitment

- Directors and Department Managers will not pay attention if their boss doesn't mandate them to
- This is not their full time job or even part of their job requirements
- Healthcare deals with emergencies every single day, convincing anyone this is important is challenging to say the least

Solutions – Senior Level Commitment

- There are generally three actions that will trigger this without Emergency Manager intervention:
 - Regulatory requirement (i.e., CMS)
 - Audit findings
 - Regulatory infractions
- All of the above have little, if any control of the Emergency Manager, so if possible it is best to get ahead of all three

Solutions – Time and Effort

- IF you have not already started COOP or BCP planning at your organization, understand it can take time and a considerable amount of effort
- There are three ways to approach this:
 - Structured interviews
 - Let departments do it themselves
 - Hybrid approach

Solutions – Time and Effort - Interviews

- This is by-and-large the most labor intensive approach
- Involves face-to-face interviews with department managers to define and articulate all characteristics of their individual plan
- Depending on the complexity of the plan format, plan on 1 to 4 hours per department

Solutions – Time and Effort – Let them do it

- Department managers are given a template or access to a system to fill out the information themselves
- Least labor-intensive approach
- Bear in mind the “garbage-in/garbage-out” potential
- Also consider the mechanism for them sending information (e.g., platform vs. word, etc.)

Solutions – Time and Effort – Hybrid

- A mixture of the first two
- Involves some sort of interactive training component, and possibly some additional reference materials
- The output is not as optimal as Option #1, but is usually far better than Option #2 and requires significantly less time and effort than in-person interviews
- This option relies heavily on the platform they are entering information into

Solutions – Platforms

- There are a wide variety of BCP and COOP platforms available today
- Some can be hosted internally, some on the cloud
- Out-of-the-box vs. Configurable
- Web-based platforms offer many benefits:
 - Plans can be structured and maintained universally and will little administrative overhead
 - Plan output is standardized
 - Data is structured in a way that can be leveraged later on

Solutions – Platforms

- There can be limitations on web-based platforms:
 - Accessibility to data
 - Cost
 - Versatility
 - Year-to-year administrative nuisance
 - Adaptability
- Consider who the end-user is on the platform
- Consider how you will leverage the plan (e.g., box-checker or used in response/recovery/exercise)
- What other platforms are you using, can it integrate?

Demo

Future Considerations

- COOP and BCP are not going away any
- There will likely be a shift in how this is addressed:
 - Might not start with healthcare
 - Will address a need to merge disparate plans across the enterprise
 - We need to figure out how to aggregate departmental needs to the facility- and organizational-level
 - How does this coincide with the coalition-based approach?

Future Considerations

- If you are not already doing separate COOP or BCP plans, you need to think about how to address this
- Because EOPs are facility- or organization-specific, COOP/BCP cannot be easily folded in
- Departmental information can be folded into an EOP, but maintenance requirements are not realistic unless a structured platform is leveraged
- Homegrown solutions can help, but maintenance can be problematic

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Questions and Answers