

# Continuity of Operations Plan Seminar

November 8, 2018

Southwest Healthcare Preparedness Coalition

# Welcome

## *Introduce yourself*

- *Name*
- *Organization*
- *Position*
- *Have you worked on COOP before?*

# Objectives

- Describe the fundamental components of a COOP
- Describe the basic process involved in developing a COOP
- Identify guidance and standards to develop a COOP
- Describe the CMS-required elements of a COOP
- Describe how a COOP is activated and used

# Module 1

## Key concepts of COOP

# What is COOP?

“Continuity of Operations,’ or ‘COOP,’ means an effort within individual executive departments & agencies to ensure that Primary Mission-Essential Functions continue to be performed during a wide range of emergencies, including localized acts of nature, accidents, & technological or attack-related emergencies”

- *National Security Presidential Directive NSPD-51/Homeland Security Presidential Directive HSPD-20*



# Definition of COOP

The effort to assure that the capability exists to continue essential functions across a wide range of potential emergencies. Essentially, the process of maintaining operations.

# Purpose

- To re-establish critical operations in the event of a disaster or emergency which causes normal operations to altar.
- To ensure the capability to support employees and contractors, emergency responders, clients and the general public during emergencies/events.

# Key Components

COOP Plans answer the following questions in a catastrophic event or other emergency situation:

- **What** critical things do we need to do?
- **Who** will do them?
- **How** will they be done? What equipment/resources?
- **Where** will we be doing these things?
- **When** (how quickly) will we need to resume them?

Also:

- **Who's** in charge? What if he/she can't?
- **How** will we return to normal, or what if we can't?

# What do we need?

- Executive buy-in and support
- COOP planning program
  - COOP Team
- Organizational awareness and participation
- Project planning tools to define milestones, timelines and the resources needed
- Simple, clearly defined plan development processes

# Initial Planning Process

- Identify Planning Team
  - Roles and Responsibilities
- Review Current plans
  - Hazard Mitigation, Emergency Operations, Facilities emergency plans, Pandemic, etc....
- Develop Project Plan
- Budget
- Leadership Support

# Steps to COOP Program Development

***Step 1 – Designate the COOP Planning Team, Identify Operating Unit Roles and Assign Responsibilities***

***Step 2 – Develop Basis for Planning and Program***

***Step 3 – Develop Planning Assumptions***

# Steps to COOP Program Development

*Step 4 – Determine COOP Activation Team*

*Step 5 – Develop of COOP*

*Step 6 – Develop Incident specific procedures for priority hazards, threats and events.*

*Step 7 – Coordinate with External Entities(Vendors, Stakeholders, Partners)*

# Steps to COOP Program Development

***Step 8 – Provide education and training to staff on COOP and implementation***

***Step 9 – Implement the COOP***

***Step 10 – Conduct on-going reviews and corrective actions for COOP each year***

# Initial Planning Meeting

- Kickoff and or Planning Team Meeting
  - COOP Overview
  - Purpose of group
  - Identify Planning Team roles
  - Development of work plan
  - Future meetings and times
  - Discussion of items
    - Essential services
    - Alternate locations
    - Orders of Succession

# Next Planning Meeting

- Planning Team Information Gathering Meeting
  - Review Department Information
    - Essential Services
    - Alternate Locations
    - Orders of Succession
  - Introduce new forms
    - Devolution
    - Vital Records and Systems
    - Interoperable Communications

# Next Planning Meeting

- COOP Planning Team Review Meeting
  - Review information from Departments
  - Start the drafting process
  - When will draft be produced
  - Feedback process from draft

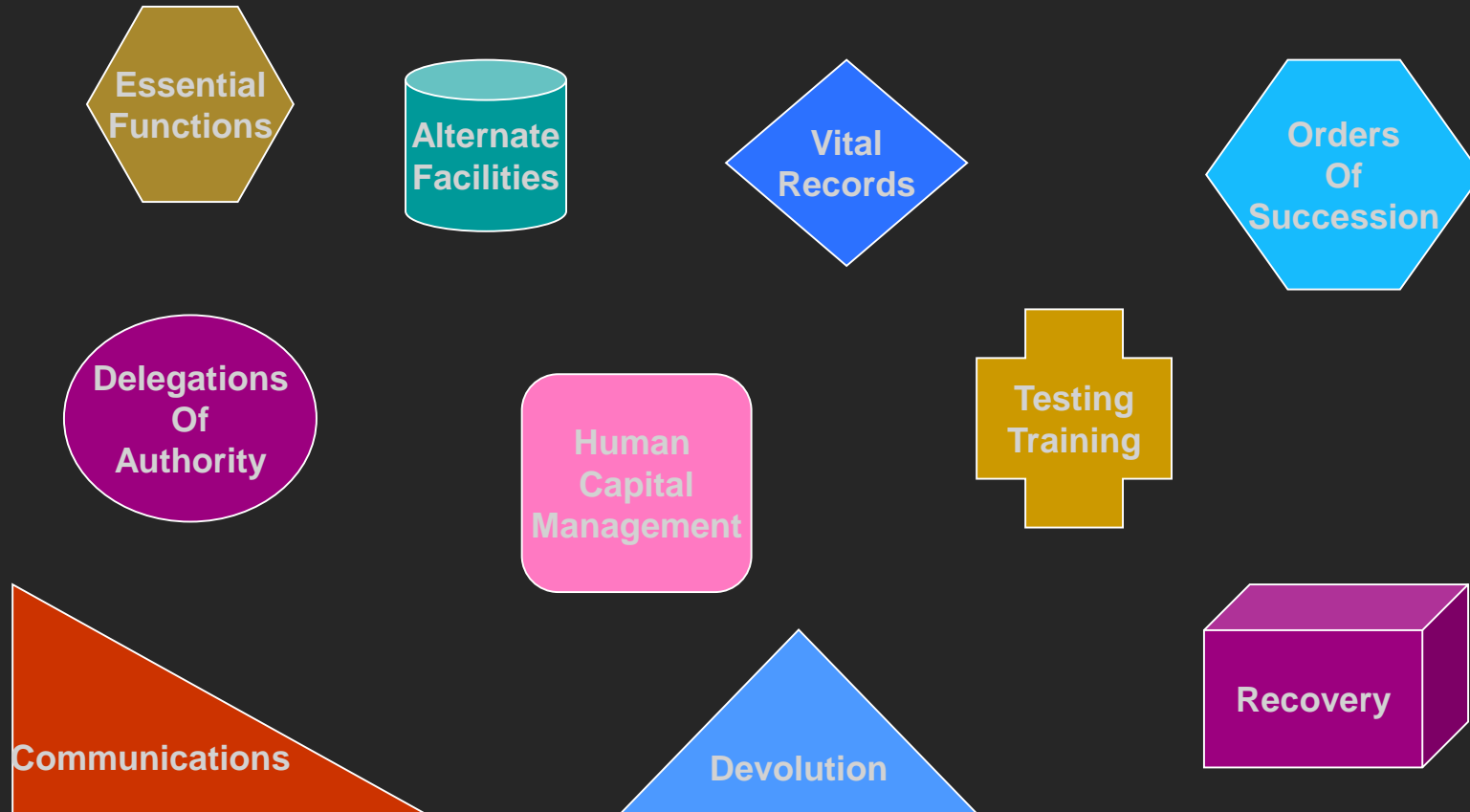
# Next Planning Meeting

- COOP Planning Team Final Meeting
  - Review draft feedback
  - Make any changes to draft
  - Finalize for presentation to leadership

# Exercises

- Conduct annual tabletop exercise to review COOP.
  - Process changes
  - Staff changes
  - Essential services changes
  - Facility changes

# Plan Elements



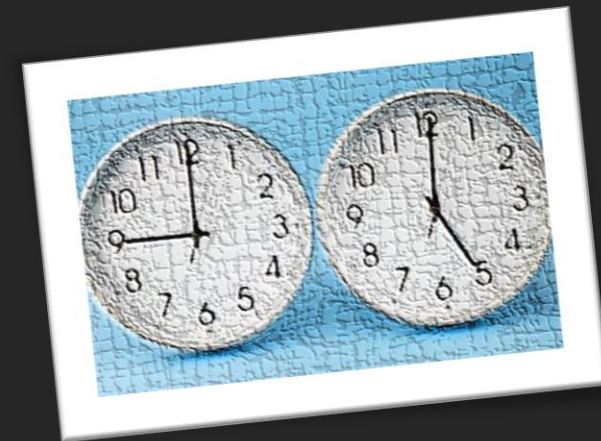
# Essential Functions

Identify services & functions that must be continued, as determined by each department.

Prioritize – time frame for being operational:

- Priority 1 – within 12 hours
- Priority 2 – within 72 hours
- Priority 3 – within 7 days
- Priority 4 – as possible

Most important planning element



# Essential Positions

- Which positions are necessary for provision of the identified essential services/functions?
- Include “Lines of Succession” for leadership
- Identify primary person & 2 alternates for each
  - Have they been trained on emergency role?
  - Are there Job Action Sheets (lists of what needs to be done) for these positions?



# Orders of Succession

Identified Orders of Succession are an essential part of a continuity program to ensure that personnel know who assumes the authority and responsibility of the Department leadership if that leadership is incapacitated or becomes otherwise unavailable during a continuity situation.

# Delegation of authority

Delegations of Authority provides dispersed personnel with the authority to make key decisions during a continuity situation where the primary decision maker is not available. Predetermined Delegation of Authority will take effect when an emergency situation disrupts normal channels of direction and control and ends when the Department is able to reestablish those channels.

# Alert and Notification Implementation

- How do you notify staff of COOP activation?
- Create process/policy

# Alternate Facilities to provide

Sufficient space and equipment;

The capability to perform essential functions within 12 hours and 30 days

Reliable logistical support, services and infrastructure systems

Consideration for health and safety for personnel

Interoperable communications

Computer equipment and software

Badge/Security access

# Alternate location/Facilities

Primary Alternate Facility	
Name of Alternate Site	
Point of Contact Name	
Phone Number	
Alternate Number	
Complete Address of Site	
Equipment on Site	
Support Staff Contact Information (AV, IT, Telecoms, facilities, security, etc.)	

# Vital Records

Records or documents which, if damaged or destroyed, would disrupt agency operations and information flow, cause considerable inconvenience and require replacement or re-creation at considerable expense.

# Vital Resources

- Documents & records
  - Emergency: plans, Job Action Sheets, Lines of Succession
  - Legal/financial: payroll, contracts, personnel files
- Software & applications
  - Microsoft Office, email, databases
- Equipment
  - Computers, phones, internet



# Contingency staff

- The personnel of the Department designated to report to the alternate facility/location during COOP implementation to ensure that the Department is able to perform its essential functions.

# Devolution

- The capability to transfer statutory authority and responsibility for essential functions from an agency's primary operating staff and facilities to other employees and facilities and to sustain that operational capability for an extended period.

# Phase 3 - Reconstitution

- Reconstitution is the process by which organizational personnel resume normal operations from the original or replacement facility.

# Decision process

Decision Matrix for Continuity of Operations Plan Implementation

	Work Hours	Non-Work Hours
Event with Warning	<ul style="list-style-type: none"> <li>• Is the threat aimed at the facility or its surrounding area?</li> <li>• Is the threat aimed at agency personnel?</li> <li>• Are employees unsafe remaining in the facility and/or area?</li> </ul>	<ul style="list-style-type: none"> <li>• Is the threat aimed at the facility or its surrounding area?</li> <li>• Is the threat aimed at agency personnel?</li> <li>• Who should be notified of the threat?</li> <li>• Is it safe for employees to return to work the next day?</li> </ul>
Event without Warning	<ul style="list-style-type: none"> <li>• Is the facility affected?</li> <li>• Are personnel affected?</li> <li>• Have personnel safely evacuated, or are they sheltering-in-place?</li> <li>• What are instructions from first responders?</li> <li>• How soon must the organization be operational?</li> </ul>	<ul style="list-style-type: none"> <li>• Is the facility affected?</li> <li>• What are instructions from first responders?</li> <li>• How soon must the organization be operational?</li> </ul>

# COOP Activation Phases

- Phase 1: Emergency Response
  - Initial activation
- Phase 2: Event Assessment
  - Assess workstations, facilities, impact/outage length
- Phase 3: Notification & Implementation
  - Implement emergency policies & communication protocols
- Phase 4: Continuity of Operations Preparations
  - Arrange for transfer activities, personnel, records, equipment

# COOP Activation Phases

- Phase 5: Continuity of Operations
  - Execution of essential operations at alternate facility
- Phase 6: Public Information
  - Partner & media information
- Phase 7: Reconstitution; Final Report Activity
  - Normal operations resume; After Action Report created



# Module 2

## Application of Continuity Principles in Emergency Planning

[research\CEMA Continuity Planning.pdf](#)

# Program Initiation and Management

- Establish the need for a business continuity program.
- Obtain support and funding for the business continuity program.
- Build the organizational framework to support the business continuity program.
- Introduce key concepts, such as program management, risk awareness, identification of critical functions/processes, recovery strategies, training and awareness, and exercising/testing.

# Risk Evaluation and Control Business Impact Analysis

- Identify risks that can adversely affect an entity's resources or image.
- Assess risks to determine the potential impacts to the entity, enabling the entity to determine the most effective use of resources to reduce these potential impacts.

# Risk Evaluation and Control Business Impact Analysis

- Identify and prioritize the entity's functions and processes in order to ascertain which ones will have the greatest impact should they not be available.
- Assess the resources required to support the business impact analysis process.
- Analyze the findings to ascertain any gaps between the entity's requirements and its ability to deliver those requirements.

# Develop Alternate Strategies

- Delegation of Authority
- Succession Planning
- Alternate Facilities

# Emergency Response and Operations

- Incident Management System
- Incident response plan
- Coordinated with outside agencies in a timely and effective manner

# Develop and Implement Plans

- Document plans to be used during an incident that will enable the entity to continue to function.

# Training and Awareness

## Maintain Exercise Plans

- Establish and maintain training and awareness programs that result in personnel being able to respond to incidents in a calm and efficient manner.
- Establish an exercise, assessment and maintenance program to maintain a state of readiness.

# Public Relations and Crisis Comm Coordination with the Community

- Provide a framework for developing a crisis communications plan.
- Ensure that the crisis communications plan will provide for timely, effective communication with internal and external parties.

# Module 3

Required Elements of a COOP  
CMS Emergency Preparedness Rule  
Field Surveyors Tool

<https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertEmergPrep/Emergency-Prep-Rule.html>

# #4 Develop and Maintain EP Program

- Updated Annually – Document
- Risk assessments, COOP Plan, Hazards
  - Care-related emergencies
  - Equipment and utility failures
  - Cyber-attacks
  - Loss of facility
  - Supply chain

# #4 Develop and Maintain EP Program

## Survey Procedures

- Verify is a plan
- Ask leadership to identify hazards
- Review plan for required elements
- Verify reviewed and updated annually

# #7 EP Program Patient Population

- Plans specify the population you serve within the facility
- Policy patients requiring assistance during evacuation
- Types of service and who is doing it during emergency
- FEMA and ASPR as resources

# #7 EP Program Patient Population

## Survey Procedures – Interview Leadership

- Patient population – risk
- Strategies for at risk group
- Services provide
- Plan to continue operations
- Delegation of Authority and succession plans

# #8 Establishment of the EP Program

## OPO

- OPO agreements and what roles staff have

### Survey Procedures

- Service OPO provides
- OPO plans to continue ops
- Delegation of Authority and Succession plan
- OPO agreements with all hospitals

# #23 Policies and Procedures for Med Docs

- Patient records are secure and readily available to support continuity of care.

## Survey procedure

- Ask to see copy

# #25 Arrangement with other Facilities

- Prearranged transfer agreements
- MOU's

## Survey Procedures

- Ask to see copies of agreements
- Ask leadership to explain transportation during evacuation

# #26 Roles under a Waiver Declared by Secretary

- Policies and procedures that describe role in providing care at an alternate care site (ACS)
- Role during declared emergencies
- Coordination efforts waiver requirements granted

## Survey Procedure

- Verify Policy and procedures section 1135 waiver ACS

# #30 Names and Contact Information

- Contact list with other like facilities
- Communications with Transplant Centers

## Survey Procedures

- Verify all required contacts on communication plan
- Verify reviewed and updated annually

# #33 Methods for Sharing Information

- Communications plan for information communicated to facilities during evacuation
- Release of information permitted under 45 CFR 164.510
- Policy on HIPAA during disaster events

# #33 Methods for Sharing Information

- Verify Comm plan methods to share information
- Verify policy and procedure for release of information during a disaster for general condition and location.

# #39 Emergency Prep Testing Requirements

- Conduct annual exercise of the plan
  - Full-scale is not FEMA HSEEP version
- Exercise with others
- Documentation of playing with others
- Engage with HCC
- Documentation of compliance of exercises

# #39 Emergency Prep Testing Requirements

## Survey Procedures

- Ask for documentation of Tabletop or Full scale Ex
  - Ex Plan, AAR, etc...
- Ask for documentation of efforts
- Ask for documentation of analysis and any updated info

# #41 Hospital CAH and LTC Emergency

- Stand by Power
- NFPA 99 and 110 – Essential Electric System
- Location of generator

# #41 Hospital CAH and LTC Emergency

## Survey Procedure

- Verify Standby power
- Review Shelter in place for standby power
- Construction relocation
- Fuel source maintain for standby power

# #44 OPO Continuity of Operations

- OPO may relocate to ACS

## Survey Procedures

- Verify OPO protocols with every certified transplant program associated with
- Verify OPO has plan for operations at alternate location

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# Questions

Thank You