DOES YOUR BUSINESS CONTINUITY PLAN ADDRESS AN EVENT LIKE EBOLA?

The degree of spread of Ebola in the months ahead is uncertain. In the unlikely event of a worst-case scenario, can your organization meet the issues and answer the questions that are sure to arise? The best preparation you can undertake is to formulate and practice a response plan. The best time to start is right now.

BUSINESS CONTINUITY PLAN – KEY CONCEPTS

If you do not have a business continuity plan (BCP) in place or have not reviewed it in a while, now is the time to do so. The first step is to identify mission-critical operations and business functions. Because everyone in an organization tends to feel what he or she does is most important, a formalized method is needed to separate the essential business functions from the non-essential functions that can be suspended during a major business disruption.

HR MATTERS

Human Resources must play a large role in any assessment of the Ebola risk. An organization’s most important asset is its people. While Ebola will not likely affect the physical infrastructure of an organization, it may ultimately threaten all operations by its impact on the individual. Since HR departments strive to ensure the health, safety and welfare of employees, in a crisis this team will need to maintain adequate staffing and monitor employee health.

Corporate policies regarding employee practices, pay practices, time-off benefits, work from home policies, travel restrictions and precautions, standards of conduct, new associate orientation, and communications should all be coordinated with HR to determine the potential impact on workforce capabilities. Communication is critical to ensure everyone knows what is going on. Information and advisories via hotlines, websites and voice message system alerts – operating like a reverse 911 system – can be crucial.

AN EVENT’S POTENTIAL EFFECT ON YOUR BUSINESS OPERATIONS

So, what plan does your business have in place to deal with the possible effects of Ebola on your daily operations? Business continuity plans tend to address more common catastrophes (e.g., earthquakes, fires, floods) that result in physical damage to property and assets. An infectious disease emergency requires special consideration. Unlike other potentially catastrophic events, the Ebola epidemic may not always be geographically or temporally bound. A fire may blaze over a single location and strike without warning. A hurricane or flood may devastate a specific region. Ebola, however, can occur in waves of variable duration and severity throughout the world.

The good news is that a traditional business continuity management program can be the core of a plan that addresses this threat.
BUSINESS IMPACT ANALYSIS

If we compare business continuity plan development to building a house, the business impact analysis (BIA) is the foundation. The BIA is a process that determines the effect of an interruption or disruption on systems, equipment, services or personnel. In performing a BIA, identify the maximum time before the interruption of a function or process causes significant harm to the business. This time lapse is called the recovery time objective (RTO). RTOs can range from seconds, to hours, to days.

When determining RTOs, consider operational contingencies; for example, worker(s) with potential exposure to Ebola in circumstances that may require extended quarantine. You may also have positions that are not easily filled by others (contingency staffing) and this should be factored into the RTO.

PRACTICE YOUR IMPLEMENTATION

Once the plan is developed, perform an exercise in which everyone assigned a specific task becomes familiar with their assigned role. Remember: this is a plan exercise and not a test, since a test implies something you either pass or fail. Here, the emphasis is on practicing and learning. Consider several types of exercises and training steps.

- An informal orientation that lasts about an hour is one way to educate personnel on the function and processes of the plan.
- In a tabletop exercise, staff reviews and discusses the actions they would take, but no one actually performs any of these actions. This may take 2-4 hours.
- A functional exercise simulates a scenario as realistically as possible without moving personnel, equipment and resources to the actual backup sites. This may take 4-6 hours.
- In a full-scale exercise, personnel, equipment and resources are deployed to specific locations for a real-time simulation of a scenario. This can last 6-8 hours.

A business continuity plan should also include regular plan review, both during (including someone taking notes) and after an actual event. For example: say there were employees who were actually exposed to the Ebola virus. What could have been done better to prepare and respond? Hold a critique post-event so you can be better prepared for the next disruption. Remember to include how you would address any media issues resulting from being identified as the employer.

CONDUCTING A BUSINESS IMPACT ANALYSIS

In conducting any BIA, all levels of leadership in the organization should address these key questions:

- How important is a particular function to your overall business? What clients and other business units depend on this function?
- Could you lose clients if this function is not provided in a timely manner?
- Could there be significant revenue loss if this function is not performed?
- Is there risk of a substantial fine or penalty if the function is not completed?
- How long can a business function or customer service be delayed before there is an adverse effect?
- Do you rely on outside service providers for vital information, products or services?
- What would be the impact to your business if these providers are unable to operate?
- Could a service disruption lead to a loss of client confidence and, ultimately, the client’s business?
- Could your company reputation be harmed because of a prolonged business interruption?
In addition to detailed interviews with senior management in charge of each business unit, when developing your BIA, consider the following:

- It may be helpful to diagram your workflow so you can visualize all the dependencies and components of each function. That will help you estimate the impact of losing one of these dependencies or components.
- As outage time increases, a function or service that began as a low priority may become a higher priority.
- Business interruption can result in tangible losses: declining revenue, departing customers and potential fines. There are also intangible losses, such as loss of reputation and damage to the company’s image.
- Disruptions affect business units at different times. Some functions or services may be adversely affected within minutes, while others may take hours or days.

## RESPONSE AND RECOVERY

Once your BIA is complete and your recovery time objectives are set, begin developing response and recovery procedures.

### 1. MANAGEMENT STRUCTURE

Orders of succession for key positions should be of sufficient depth to ensure continuity in the management and direction of the organization’s essential functions and operations. Succession plans for leadership should be at least three deep in each position. Organizations should also document delegations of authority that specify limits of that authority. Who, in your organization, has the authority to declare an event a disaster? This declaration will set everything in motion, so be absolutely sure that your definition of disaster/event is clear and its criteria have been met.

### 2. CONTINUITY

Disaster/event plans usually call for the setup of a command center or emergency operations center (EOC). Keep in mind that during an Ebola outbreak, you may need to (re)locate the command center from its original planned designated area. Regardless of location, the center is there to manage support services and infrastructure. This may include supplying such essential items as food and water, laptops and phones.

### 3. VITAL RECORDS

Your company will want to have the data available to sustain operations for at least 30 days. If not already developed and maintained, a current list of vital records, systems and databases should be developed. Hard copies of vital records should be current at each facility.

Creating a BCP helps ensure development of complex responses to complex situations. A wait-and-see approach will not work. Since everyone in the organization becomes involved in the process, an examination of difficult and controversial issues takes place. The time to work out the logistics of who is in charge, what authority they have, as well as other political issues that surface in an emergency and affect large numbers of people is before the crisis, not during it.

A BCP will address the wellbeing of employees, minimize the extent of disruption, establish alternative means of operation, minimize the economic impact, train and educate personnel so they are familiar with emergency operations and functions, and provide for a smooth and rapid transition of services.
KEY QUESTIONS

MISSION-CRITICAL OPERATIONS

If your organization were affected by the Ebola virus, your BCP should help you answer key, immediate questions concerning your mission-critical operations, starting with *if a number of our employees or others within our supply chain are not able to continue operations...*

1. How long can we sustain our operations?
   - A few days, weeks, a month or longer?

2. What can be done to minimize the impact on revenues and expenses? Is now the time to consider:
   - Modified work schedules and locations?
   - Changing operating hours?
   - Temporarily ceasing non-essential functions?
   - Who is tracking potential business interruption-related costs?

3. Do we have contingency suppliers and vendors that are also prepared? Have we asked? Have we considered:
   - Logistics?
   - Temporary staffing services?

4. Have we reviewed our contractual obligations if we cannot deliver goods or services?
   - Are there fines or penalties involved if we cannot meet those obligations?

5. Have we cross-trained employees, especially in leaner staffed areas? In...
   - Media relations?
   - Risk management?
   - Human resources (HR can expect many calls related to sick pay, absenteeism, benefits, FMLA, etc.)?
   - Payroll (everyone still wants their check deposited)?
   - Accounts payable?
   - PBX operators?
   - IT staff?

6. Have we performed real-time testing of remote access by large numbers of employees so that we know our systems can handle the load?

7. Do supervisors know how to manage a dispersed workforce to ensure work is being done?

8. Have contingency signatory authorizations been put in place for dispersing funds and other operational necessities? (Remember, CFOs get sick, too.)

WHAT NOW?

Now that you have a BCP, the first thing to do in a crisis or when there is significant potential/probability for one to occur is **communicate**. Communicate to your employees, customers and vendors. The most vital message is often: “We are monitoring the situation.” Communicating something is better than communicating nothing. Employees who feel safe and that their employer is prepared are more likely to remain productive during a crisis. Apprehensive or scared employees may not show up to work. Share with your customers that you have a plan in place, you intend for business to continue as usual, and they should contact you at any time with any concerns. Ask tough questions of suppliers and vendors regarding their supply chains and their own accessibility.

Methods to communicate and educate:
- Posters
- Email blasts
- Daily updates on intranet sites
- Links to CDC [http://www.cdc.gov/vhf/ebola/](http://www.cdc.gov/vhf/ebola/)

HR ISSUES

Your guiding principle regarding HR issues should be flexibility, with the overriding goal being wellness in the workplace. The aim is to keep a healthy workforce on the job. Beyond that:

- Know your sick pay and absenteeism policies (not just HR professionals but supervisors, as well).
- A team should have already determined responses to the most frequently asked HR questions in order to deliver a consistent message. This message could be scripted for managers.
- Know your company’s normal absentee rates. Monitor current rates and be ready to act if they start to climb.
- Know how to handle employees who arrive at work ill and how best to send them home.
- Explore alternative child care/elder care solutions.
- Does your type of business put your employees at a higher risk of a potential Ebola exposure, and have you addressed that in your plan?
- Depending on your industry, review travel policies. Know how you would address employees/volunteers located in high risk areas.

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Consider or meet with occupational health or corporate medicine service providers concerning the following (where applicable):
• Turn-key operations
• Education
• Medical supplies

A word of caution:
• On extended time out: family leave issues may apply, especially if an employee or family member has complications or extended illness.
• Also, there is potential for ADA, OSHA, and Workers’ Compensation legal issues to arise. Be very cautious with personal medical information, which must be kept strictly private. You cannot say, “We sent Jen home because her daughter came into contact with someone they are screening for Ebola.”
• Remember, OSHA’s general duty clause requires employers to provide “safe and healthful working conditions.” Be prepared to show that you did and you do.

BEST PRACTICES AND RESOURCES

If you haven’t visited the CDC website, do so. They have specific guidelines for the workplace as well as posters and educational material available for download at http://www.cdc.gov/vhf/ebola/index.html

The OSHA and NIOSH websites both provide general, and industry-specific recommendations specific for the current Ebola outbreak at https://www.osha.gov/SLTC/ebola/index.html or http://www.cdc.gov/niosh/topics/ebola/

Consider acquiring access to an occupational medicine expert.

Consider a hotline, intranet portal or email link where employees can leave questions and get answers.

Put FAQs on your intranet site and include links to the CDC. Free communication resources from the CDC are available at http://www.cdc.gov/vhf/ebola/resources/index.html#crposters.

Consider recognition for team play and awarding those who go beyond expectations to help keep your operation going.

When all is over, you can reflect on things and adjust accordingly. Pull a group together, evaluate your own performance and tweak your plan to ensure the best possible preparedness in the face of future uncertainties.
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