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 Owner: *Kate Sanders: VP, Systems Administration*
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 References: *1.J.3.c*

Disaster Plan – Protection of Critical Information and Continuation of Operations

POLICIES AND PROCEDURES

Information Systems

POLICY:

Porter-Starke must have the ability to respond to any interruptions in system access in order to continue to provide high quality care to clients and to maintain clinical and administrative operations necessary to support service delivery.

PURPOSE:

this policy outlines how PSS will respond to interruptions in access to any physical plant and/or software necessary for the delivery of care and continued administrative functions.

PROCEDURES:

1. **System Priorities:** The system is divided into Level 1 and Level 2 priorities. Level 1 priority areas are established to identify those systems that are critical to continued client care and service billing. Access to systems that house clinical information, with emphasis on prescribing within the EMR and dosing management for the Methadone clinic, is critical. Critical applications are indicated with an asterisk (*) below. Level 2 priorities are systems that, while important, are not critical to client care.

	Level 1	Level 2
Critical Applications	X	
Internet	X	
Electronic Medical Record (SmartCare, Dentrax, Epic through Methodist)*	X	
Methadone (Methasoft)*	X	
Practice Management (SmartCare and Accumed)	X	
Phones	X	
Active Directory Server & File Server	X	

Servers (except Active Directory & File Servers)		X
Accounting Software		X
HR Software		X

2. **Disaster/Business Interruption Levels:** There are three Tiers of Disaster/ Business Interruption

- a. **Tier 1:** Tier 1 Business Interruptions are business interruptions that are confined to a single or small number of sites and are not expected to continue beyond approximately a 24-hour time period. These include interruptions in fiber access (PSS is fully connected via fiber in order to limit any lack of access to critical software from any location to the primary servers housing the critical and Level 1 software), electrical storms, and building access limitations due to power outages and/or natural occurrences such as snow storms, as examples.
- b. **Tier 2:** Tier 2 Business Interruptions are business interruptions that are less than a full scale disaster but are expected to last more than 24 hours.
- c. **Tier 3:** Tier 3 Business Interruptions are business interruptions that are extensive and will require relocation of business operations and/or access to back-up systems due to extensive damage to existing structures and/or on-site servers.

3. **Management of Tier 1 Business Interruptions**

- a. Brief Interruptions in system access are responded to by the IT Department with back-up from the contracted IT company so that there is 24-hour, seven-days-per-week response capability. The contracted IT Company has full access to PSS servers and is kept informed of system issues so that they are able to respond to calls.
- b. The contracted IT Company monitors system servers to detect any access or operational issues and to react to those as quickly as possible.
- c. Procedures are in place to provide clinical care and to continue to prescribe even if system access is briefly interrupted. [See Business Interruption Plans provided by each department, stored electronically and on paper with the HIM Director.]
- d. Procedures are in place to provide clinical care and, in the case of the Methadone Clinics, to dose even if system access is briefly interrupted. [See "OTP Program Description and Plan Section 2, Disaster Plan for details.]
- e. Interruptions are responded to immediately. PSS staff determines the source of the problem, identify who and how to resolve the problem and then work to restore access as quickly as possible, based on the nature and source of the trouble.
- f. Staff at the affected locations are informed via available communication systems of the estimated length of time to resolve and any immediate operational issues that they are experiencing are discussed and solutions implemented. Supervisory staff in the affected areas are part of the discussion so that communication with staff is as efficient as possible. [Business Interruption Plans include cell phone numbers of key staff if necessary. Calls/communications will be implemented following normal supervisory chain to maximize effectiveness and efficiency.]
- g. When access is restored, clinical staff will complete their documentation in the medical record to insure that it is complete and up to date. The HIM Director will facilitate compliance with timely completion of documentation.
- h. Other operations that may have been affected complete any entry that is required to bring their

systems up to date.

- i. Streamline SmartCare is hosted by Streamline -- PSS will work with Streamline staff to handle interruptions necessitating Streamline's involvement.
- j. Epic is hosted by Methodist Hospitals – PSS will follow Methodist procedures in case of interruption in access to the medical record for Marram Health Center.

k.

Tier 1 Business Interruptions and Responsible Staff	
Type of Business Interruption	Who is Responsible
Software operations issues	Director managing that software, IT
Internet access down	IT staff, contracted IT company
Phone system down	IT staff, contracted phone company
Fiber optics cut or breached	IT staff, contracted IT company
Ransomware attack or similar	IT, contracted IT company, CEO, VPs, others as determined by the event
Other	Determined by event

4. Management of Tier 2 Business Interruptions

- a. Tier 2 Business Interruptions may require more extensive response than Tier 1.
- b. Impact on individual sites is evaluated by management and other staff so that operational decisions are made which will provide maximum continued clinical and other operations.

Tier 2 Business Interruptions and Responsible Staff	
Type of Business Interruption	Who is Responsible
Software operations issues	Director managing that software, IT
Internet Access Down	IT staff, contracted IT company
Phone System Down	IT staff, contracted phone company
Fiber optics cut or breached	IT staff, contracted IT company
Natural disaster - minor (e.g. electrical storm)	CEO, Vice Presidents and others as determined by the event
Natural disaster - major (e.g. tornado)	CEO, Vice Presidents and others as determined by the event
Ransomware attack or similar	IT, contracted IT company, CEO, VPs, others as determined by the event
Other	Determined by event

- c. Secondary sites may be closed (e.g. power outage that is expected to be longer-term than 24 hours) and clinical care accommodated at the primary Valparaiso location. The Vice President of Clinical Services, CEO, and other staff will be involved in the decision-making process. As part of the process of determination about site closure and service shift, the following considerations are made:

Site Closure Determination Steps and Process	
Actions	Who is Responsible
Site Closure Determination	CEO
Notification through public media	CFO, Marketing
Client Notification of appointment site change	Front Desk Coordinator
Staff Notification	CFO, Director of HR
Reschedule of clinical and support staff to new site	VP Clinical Services, VP Medical Services, VP Systems Administration
Office Accommodation	VP Clinical Services, VP Medical Services
Computer Access	VP Systems Administration, IT, contracted IT company

- d. Individual Department Directors and others are consulted to detail how business operations will be continued during the time period of Tier 2 business interruption. Each Director is expected to have a plan for brief and extensive business interruptions. [See Business Interruption Plans provided by each department, stored electronically and on paper with the HIM Director.]
- e. IT staff together with the contracted IT company will immediately review systems access issues and any need to restore from back-up, following those procedures.

5. Management of Tier 3 Business Interruptions

- a. Tier 3 Business Interruptions are the most extensive and disruptive to business and clinical operations.
- b. Determination of the need to relocate major portions of the business is made first. The CEO, CFO, and Vice Presidents, along with other key management personnel including the Facilities Director and IT staff will participate in the determination of the need for this level of relocation.
- c. Location of alternative office space and restoration of Internet and system access are the priorities.

Tier 3 Business Interruption Actions, Priorities, and Responsible Staff		
Actions	Priorities	Who is Responsible
Identify and secure alternative office space for core clinical operations	Psychiatry	CEO, Executive Team
	Clinical Service Delivery, office-based and home-based	CEO, Executive Team
	Business and other support operations	CEO, Executive Team
Internet Access		IT Staff, contracted IT company
Phone Access		IT Staff, contracted IT company

Tier 3 Business Interruption Actions, Priorities, and Responsible Staff		
Secure hardware needed locally		IT Staff, contracted IT company
Restore from back-up	See priority grid earlier in this procedure	IT Staff, contracted IT company
Establish time-framed plan for full restoration of services		IT, CEO, Executive Team

- d. All Department Directors are expected to have and to submit plans for response to Tier 3 business interruptions for review and adoption.

Attachments

No Attachments

Approval Signatures

Approver	Date
Kate Sanders: VP, Systems Administration	10/2021