

# CONTINGENCY PLANNING



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# CME DISCLOSURE

I have no financial relationships with any commercial interest

# DISCLAIMER

Nothing I say today is legal advice!

# OBJECTIVES

At the conclusion of this program, attendees will be able to:

- Explain the importance of having contingency plans for an office-based practice.
- Describe the elements of a contingency plan.

# GOALS OF A DISASTER PLAN

1. *Minimize* the probability of injury or loss related to your patients, visitors, and or employees in an emergency;
2. *Minimize*, or prevent altogether, the risk of property loss (including equipment, patient and business records, etc.)
3. *Minimize* down time and expedite your recovery from the disaster.

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**IF YOU FAIL TO PLAN,  
YOU ARE PLANNING**

**TO FAIL.**

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**-BENJAMIN FRANKLIN**

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DEVELOPING THE PLAN  
**GETTING STARTED**

# GETTING STARTED: MAKE A LIST

- Tornado
- Hurricane
- Flood
- Earthquake
- Blizzard
- Fire
- Burst pipe
- Power outage
- Hazmat spill
- Bomb threat
- Nuclear disaster
- Pandemic
- Tsunami
- Terror attack
- Medical emergency
- Psychiatric emergency
- Violent patient
- Ransomware attack
- Psychiatrist's health crisis
- Civil unrest
- Avalanche
- Etc.



DEVELOPING THE PLAN  
**COMMON NEEDS**

# DEVELOPING THE PLAN: COMMON NEEDS

## Early warning

- Community alerts
- NOAA Radios

# DEVELOPING THE PLAN: COMMON NEEDS

## List of contacts

- Staff
  - › All methods of contact
  - › Chain of command
- Utility companies
- Plumber
- Electrician
- Internet service provider
- Cell phone service provider
- EHR tech support

# DEVELOPING THE PLAN: COMMON NEEDS

## List of contacts

- Building manager
- Building security
- Insurance agent
- Cleanup/restoration company
- Health department
- FEMA
- PRMS or your own carrier

# DEVELOPING THE PLAN: COMMON NEEDS

## Patient communication plan

- Outgoing voicemail message
- Website
- Patient portal
- Other social media
- Can landline number be forwarded to a cell
- Instructions for answering service

# DEVELOPING THE PLAN: COMMON NEEDS

## Securing medical records *before* a disaster

- Electronic health records
  - › HIPAA Security Rule
  - › Backup
    - Backup tape secure location
    - Remote storage separate locations

# DEVELOPING THE PLAN: COMMON NEEDS

## Securing medical records *before* a disaster

- In office
  - › Locked
  - › Fire-proof cabinet
  - › Away from water
- Off-site

# DEVELOPING THE PLAN: COMMON NEEDS

## Securing medical records *after* a disaster

- Act quickly!
- Secure what remains of records
- Take photos of damaged area
- Keep copies of insurance claims
- Newspaper clippings
- Ascertain whose records were affected



# DEVELOPING THE PLAN: COMMON NEEDS

## Securing medical records *after* a disaster

- Reconstruct
  - › Start with most active files
  - › Clearly document reconstruction
  - › Be candid with patients
  - › Gather copies from other providers
  - › Pharmacy records
  - › PMP
  - › Duty to retain damaged records

# DEVELOPING THE PLAN: COMMON NEEDS

## Insurance coverage

- Sufficient funds to get you back into operation?
- Current or replacement value?
- Photos or video of assets
- Floods and earthquakes?
- Business interruption insurance?
- Keep copies off-site

# DEVELOPING THE PLAN: COMMON NEEDS

## Remote operation/Business continuity

- Equipment
  - › Computer
  - › Fax
  - › Scanner
- Records access
- Billing system
- Cash reserve/line of credit

# DEVELOPING THE PLAN: COMMON NEEDS

## Loss of internet

- Record access
- Prescription pads
- Encounter forms
- Paper progress notes
- Receipt book
- Message slips

# DEVELOPING THE PLAN: COMMON NEEDS

## Emergency supplies/equipment

- First aid kit
- Flashlight
- Fire extinguisher
- Defibrillator
- Basic tool kit
- Battery operated radio
- Supplies to shelter in place

# DEVELOPING THE PLAN: COMMON NEEDS

## Contingency plan

- Contacts
- Chain of command
- Access records, voicemail, calendar, etc.
- Psychiatrist to cover
- Prescription refills
- Instructions re release of records
- What to tell patients
- Others to call for advice

DEVELOPING THE PLAN  
**SPECIFIC NEEDS**

## HELPFUL HINT

Every state and most large cities have an emergency management office tasked with providing guidance and information in case of disaster. Most, if not all, of these offices have websites with useful information that will aid you in your emergency planning.



 

# Earthquakes

An earthquake is a sudden, rapid shaking of the ground caused by the shifting of rocks deep underneath the earth's surface. Earthquakes can happen without warning and can result in injuries and damage to property and roads. Earthquakes can cause fires, tsunamis, landslides or avalanches. While they can happen anywhere, areas at higher risk for earthquakes include California, Oregon, Washington, Alaska, Hawaii, Puerto Rico and the Mississippi Valley.

If an earthquake happens, protect yourself right away.

- If you are in a car, pull over and stop. Set your parking brake.
- If you are in bed, turn face down and cover your head and neck with a pillow.
- If you are outdoors, stay outdoors away from buildings.
- Do not get in a doorway.
- Do not run outside.

## Stay Safe During an Earthquake: Drop, Cover, and Hold On

# Protect Yourself During Earthquakes!

### Disasters and Emergencies

[Emergency Alerts](#)

[Active Shooter](#)

[Attacks in Public Places](#)

[Avalanche](#)

[Bioterrorism](#)

[Chemical Emergencies](#)

[Cybersecurity](#)

[Drought](#)

**[Earthquakes](#)**

[Explosions](#)

[Extreme Heat](#)

# DEVELOPING THE PLAN: SPECIFICS

## Fire

- What's already in place?
- Building evacuation plan
  - › Route unobstructed
  - › Fire doors unlocked
  - › Make copies of maps
- Smoke detectors
- Sprinkler system
- Fire and other alarms
- Fire extinguishers – regularly checked
- If no plan, discuss

# DEVELOPING THE PLAN: SPECIFICS

## Fire safety tips

- Don't overload circuits
- Replace frayed cords
- Turn off/unplug unused appliances
- Keep fire doors closed
- Don't block exits
- Remove paper and trash
- Don't allow candles
- Fire extinguisher
- Smoke alarms

# DEVELOPING THE PLAN: SPECIFICS

## Fire – other considerations

- Designated location
- Ensure file cabinets closed
- Patients with mobility issues

# DEVELOPING THE PLAN: SPECIFICS

## Flooding

- Consider office location
  - › Flood plain
  - › First floor
- Storage within office
  - › Active and inactive
- Off-site storage
  - › Home
  - › Storage facility
  - › Other

# DEVELOPING THE PLAN: SPECIFICS

## Tornado/severe storms

- Advance warning
- Basement
- Designated storm shelter
  - › Not cluttered with storage
- Other area in building
- Map
- Plan for directing patients

# DEVELOPING THE PLAN: SPECIFICS

## Cyber/Ransomware Attack

- Malicious software encrypts files
- Payment is demanded for encryption key
- Phishing emails or “drive-by” downloading
- Healthcare providers often targeted
  - › Value of healthcare records
  - › Industry transition to EHRs
  - › Lack of security technology in small practices

# DEVELOPING THE PLAN: SPECIFICS

## How to prevent

- Recognize the risk
- Train staff
  - › Preventing ransomware
    - Email attachment
    - Emails
    - Downloading software
    - What info is okay to access and what is not
- Backup important data and store offline



# DEVELOPING THE PLAN: SPECIFICS

## How to prevent

- Encrypt sensitive practice data
- Implement technical safeguards
  - › Up-to-date antivirus software
  - › Enable automated patches for operating system and web browsers
  - › Use complex passwords
  - › Enable pop-up blockers
- Don't get complacent
- OCR Security ListServ

# DEVELOPING THE PLAN: SPECIFICS

## Psychiatric/medical emergencies

- Involuntary commitment procedure
- If using medical supplies/equipment:
  - › Secure storage
  - › Access
  - › Expiration
  - › Credentials
  - › PPE

# DEVELOPING THE PLAN: SPECIFICS

## Violent patient/visitor

- Training for front-line staff
  - › Identify problem
    - Under influence of alcohol/drugs
    - Agitation
    - Anger
    - Profanity
  - › Activate emergency system
  - › Retain distance
  - › Call 911
- Panic button
- Back exit
- Avoid after-hours appointments

# **FINALIZING THE PLAN**

# FINALIZING THE PLAN

- Keep it simple
  - › Easy to understand = easy to implement
- Keep it accessible
- Keep in practice
  - › Regular training
  - › Testing
    - Is staff familiar with plan?
    - Do they know protocols for each type of disaster?
    - Do they know and understand their respective duties in each situation?
- Keep it updated

# RESOURCES

- Federal Emergency Management Agency - [www.fema.gov](http://www.fema.gov)
- FEMA links to your local state Emergency Management Agency – [www.fema.gov/emergency-management-agencies](http://www.fema.gov/emergency-management-agencies)
- American Red Cross – [www.redcross.org/services/disaster/beprepared/busi\\_industry.html](http://www.redcross.org/services/disaster/beprepared/busi_industry.html)
- U.S. Department of Homeland Security [www.ready.gov](http://www.ready.gov)