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Program Definition

Mission
The mission of the Business Continuity Management Program (BCMP) at the University of Rochester (UR) is to build a culture of resiliency by ensuring strategies and plans are in place to prevent and counteract interruptions to business activities and protect critical business functions from the effects of major failures of internal or external disasters and to ensure their timely resumption of services.

Vision
The University will create and sustain a culture of organizational resiliency through a comprehensive and collaborative program composed of professional, knowledgeable staff who advocate minimizing risk and building efficiency and proficiency in responding to disruptive events.

Structure/Scope
The BCMP is charged with the business continuity activities for the organization. For this document and subsequent BCMP policies and standards, ‘organization’ is defined as the University of Rochester, the University of Rochester Medical Center and all the departments within each division. Specific areas of focus for the BCMP include but not limited to:

- Governance
- Disaster Recovery
- Business Impact Analysis
- Training, Exercises and Awareness
- Business Continuity
- Crisis Management
- Risk Management

A list of all divisions is provided in Appendix A.

Business Continuity Management Governance
The University of Rochester Business Continuity Management Program’s primary oversight body is the University Business Continuity Management Governance Committee. The University of Rochester (UR) Business Continuity Management Governance Committee is the guiding body to review risks and mitigation strategies associated with patient care, research, administration, and academics, set priorities for BCM Program implementation and risk mitigation, and is accountable for mitigating business continuity and disaster recovery risk levels acceptable to the University. This group defines the BCM overview and strategy, conducts final approval of, and changes to, BCM policies prior to going to the University Policy Committee for approval and adoption, and approves standards and guidelines necessary to ensure commonly acceptable practices are being employed across the organization.

The UR Business Continuity Management Governance Committee also ensures compliance with all necessary legal, regulatory and accreditation requirements are met by incorporating these requirements into policies and standards prior to going to the University Policy Committee. The Business Continuity Management Governance Committee will escalate problems to the Senior Leadership Group (SLG) and/or President’s Cabinet when necessary.

Business Continuity Management within the University
The Business Continuity Management Governance Committee is chaired by the University Senior Vice President (SVP) of Administration and Finance, Chief Financial Officer and Treasurer (CFO). Members of the committee include key business leaders across all major groups at the University, including but not limited to:
Business Continuity Management Steering Committee
The BCM Steering Committee is composed of subject matter experts and other key stakeholders who provide recommendations and guidance to the Governance Committee regarding policies, standards, and implementation strategies across the enterprise (see Business Continuity Lines of Defense below). The BCM Steering Committee is chaired by the Business Continuity Management Program Manager.

Business Continuity Management Strategy Overview
As established through the Enterprise Risk Management (REM) Program, the University has adopted the Three Line Model to the operationalization and compliance of the BCMP.

First Line
The first line is at the business level. This group is responsible for conducting and the documentation of all activities that meet the BCM policy and standard controls. As the most knowledgeable about the business, this group is responsible for business continuity plan development, updates, training and testing. Business areas shall assign business continuity liaisons who shall fulfill these activities and documentation for their business area.
Second Line
The second line is composed of the BCM Program staff and the BCM Steering Committee which is a group of subject matter experts in the various sub-specialties of BCM. The second line is charged with providing recommendations and subject matter expertise on control requirements, best practices and industry standards to the governance committee for policy and standard updates. Guidance and education to department-level staff responsible for business continuity management activities is also provided by this group and includes:

- Policy/standard changes
- Training, Exercise and Awareness Program
- Business Continuity plan development
- Disaster Recovery Program
- Coordination and collaboration with external partners
- Emergency Management

Third Line
Internal Audit is the third line in the BCMP and audits compliance against, standards and plans.

Business Continuity Organizational Structure
A chart that defines who is responsible, accountable, consulted and informed (RACI) for program activities can be found in appendix B.

**Business Continuity Management Scope of Activities**

**Business Impact Analysis**

Business Impact Analysis determines the criticality of a business function to the organization and tolerable downtimes of the business functions which is key in the pre-planning phase. Business function is defined as any singular type of resource within the organization. Examples include a department or service. The business function is reviewed on the following objectives:

- Life safety (patient, student, staff, etc.)
- User impact
- Legal/regulatory/accreditation implications
- Reputational impact
- Educational impact
- Data Classification
- Patient care delivery
- Financial impact
- Backlog business functioning
- Service level agreement
- Research impact
- Employee productivity

**Risk Management**

Through a variety of risk assessments, BCMP monitors the University for risks that could impact business delivery, develops reports with findings, and delivers corrective action plan recommendations to risk owners. Trends in risk findings get reported to the Governance Committee.

**Business Continuity Planning**

Business Continuity Planning is the development of plans that address the life cycle of an incident including immediate response plans, continuity of operations plans and recovery plans. These plans focus on people, processes and buildings to ensure resiliency.

**Disaster Recovery**

Disaster Recovery focuses on the architecture design, development, maintenance and testing of information technology resources to ensure their availability meets the business needs as defined in the business impact analysis.

**Emergency Management**

Emergency Management is the defined methodology for how the organization manages an operational disruption or declared disaster and includes standard operating procedures for incident identification, evaluation, escalation, declaration, activation and deactivation with a significant focus on crisis communications.

**Training, Exercise and Awareness Program**

The development, execution and evaluation of business continuity related training awareness materials build organizational resiliency and validate the effectiveness of business continuity and disaster recovery plans. Training, exercise, and awareness program responsibility shall span across the first and second line of defense. The BCM Program office training and awareness program shall focus on educating the business continuity liaisons and increasing a culture of resiliency at the organization. Business continuity liaisons shall be responsible for training and awareness to staff in their business area and coordinating exercises to validate plans.
The primary BCMP functions along with other BCM activities are designed to orchestrate business resiliency activity alignment with the organization’s missions and reduce overall risk to the University.

**Program Driving Influence**

The BCMP follows the best practices designed for organizations including academic medical centers. The program framework is designed to overlay and provide alignment with industry standards and regulatory requirements where necessary. This includes, but not limited to:

- BCI Good Practices Guidelines
- DRII Professional Practices 2017
- HiTrust CSF
- HIPAA 45 CRF 164.308
- CMS Emergency Preparedness Rule
- FEMA NIMS Standards
- NFPA 1600 2013
Objectives
The following objectives have been identified as the key areas where BCMP will focus its attention.

Business Continuity Management Objectives

<table>
<thead>
<tr>
<th>Focus Area</th>
<th>Objective</th>
</tr>
</thead>
</table>
| Business Continuity Management Governance | • Maintain policies and procedures that meet legal, regulatory and accrediting standards  
                                           | • Provide strategic direction and priorities for the BCMP  
                                           | • Establish KPIs and KRIs for the program to be measured to  
                                           | • Provide reporting of program progress, successes and challenges to Senior Leadership Group |
| Business Impact Analysis                  | • Identify critical services to the organization  
                                           | • Determine Recovery Time Objective (RTO) and Recovery Point Objective (RPO) for all business functions  
                                           | • Identify dependencies within the organization |
| Risk Management                           | • Continuously monitor for and identify risks to operations  
                                           | • Identify mitigation strategies to address risk  
                                           | • Evaluate effectiveness of mitigation efforts on residual risk |
| Business Continuity Plans                 | • Create plans to address immediate response, continuity of operations and recovery from a disruptive event |
| Disaster Recovery                         | • Architecture review based on business needs to ensure appropriate IT resourcing  
                                           | • Recover critical information technology resources to meet the business RTO defined in the BIA  
                                           | • Minimize data loss to meet RPO defined in the BIA |
| Crisis Management                         | • Establish standardized procedures for an efficient and prompt response, analysis, documentation, ongoing management and reporting of incidents |
| Training, Exercises and Awareness         | • Educate business continuity liaisons on best practice and requirements  
                                           | • Build a culture of resiliency in the organization  
                                           | • Increase proficiency of department staff on appropriate response, continuity and recovery actions for various scenarios  
                                           | • Validate existing plans and procedures |
Program Improvement and Maturity

The BCMP uses the Plan-Do-Check-Act (PDCA) model for continuous process improvement. Examples of activities in each phase of this model are listed below.

| Plan | Establish policies and standards (controls), procedures and goals related to business continuity management and that align with the University’s mission |
| Do | Implement and operationalize business continuity management policy, standards (controls) and procedures |
| Check | Assess performance against policy and standards (controls) and goals; report progress to Governance for review and to determine and authorize plans for remediation and improvement |
| Act | Maintain and improve the BCMP through the use of corrective action based on management review and review of scope of BCMP policy, standards and goals. |

*Credit to ISO 22301 for the table*

In coordination with the PDCA model, BCMP uses the maturity model index designed by NIST to track overall program growth. This model scores overall maturity on a scale of zero to five. The model is as follows:

<table>
<thead>
<tr>
<th>Maturity Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Existant</td>
</tr>
<tr>
<td>No policy, procedures, controls in documentation or practice</td>
</tr>
</tbody>
</table>

BCMP views level 3 as a minimum acceptable level of control and targets a score of 5 for an optimal business continuity environment. Based on the data collected, the BCMP will be responsible for assigning a score for each section area of the BCMP and an overall program score. The scores will be decided upon based on Business Continuity Governance Committee judgment.

Policies and Standards

**Overview and Structure**

The scope of policies and standards addressed within the UR BCMP encompasses key areas of several standards and may additionally include areas of focus that are unique to the UR environment. For every identified business continuity management policy, a supporting standards document will be created that gives more detailed instructions on how to achieve the goals outlined in the policy. At the discretion of the UR BCMP, additional “guidance” and template documentation may be created to help clarify and normalize expectations.
Organizational Factors: Considering the size, resources dedicated, operational capacity, employees, and financial impact.

Regulatory Factors: Considering the compliance and legal requirements the organization is subject to.

**Review and Approval**

Policies and standards will be reviewed and approved on at least an annual basis, or more frequently as needed. Changes to policy and standards are approved by the Business Continuity Governance Committee prior to going to the University Policy Committee for final approval, and maintained on the University’s Policies and Procedures website.

**Policy Exceptions / Deferrals**

Exceptions and/or deferrals to business continuity management policies or standards may be put in writing to the Business Continuity Management Governance Committee. If requests are not approved and further analysis is desired, the requestor may bring it to the Business Continuity Management Program (BCMP) Manager for disposition. If further evaluation is needed, the BCMP Manager will bring the request to the Governance Committee.

**Distribution**

All business continuity management policies and standards are posted on the University’s Policies and Procedures website to ensure all employees are kept up to date of changes. For major changes to policy and/or standard, the BCM steering committee will notify all applicable staff of the change through business continuity education and awareness email.

**Control Activities**

Based on the policies and standards defined within, a list of business continuity control activities will be defined. Control activities are defined as specific and measurable actions taken to maximize resiliency. These control activities are directly mapped to the specific sections defined in the corresponding standard, and serve as supplemental documentation to help ensure business functional area compliance with business continuity policy and standards. These controls will also serve as a basis for the BCM Steering Committee or Internal Audit to assess overall compliance with policies and standards. As these control activities are directly derived from the approved standard documents, they will not be separately reviewed or approved unless they differ from the approved documentation. The BCM Steering Committee will be responsible for creating and updating the control activity documents as procedures change.

**Roles and Responsibilities**

**Reporting Structure**

The UR BCM Steering Committee members reside in and report to leadership across the University.

**Interdepartmental Responsibilities**

Many roles and responsibilities related to or involving business continuity span multiple groups and departments. The following chart highlights critical areas of shared responsibility for business continuity management:

<table>
<thead>
<tr>
<th>Activity</th>
<th>SME Department</th>
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<tbody>
<tr>
<td>Physical Security</td>
<td>Facilities, Public Safety</td>
</tr>
<tr>
<td>Training and Awareness</td>
<td>Facilities, Public Safety, Environmental Health &amp; Safety, University IT, Information Systems Division, Public Relations, Department Business Continuity Liaisons</td>
</tr>
<tr>
<td>Crisis Communications</td>
<td>Public Relations</td>
</tr>
<tr>
<td>Risk Management</td>
<td>Facilities, Public Safety, Environmental Health &amp; Safety, University IT, Information Systems Division</td>
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<tr>
<td>Crisis Management</td>
<td>Environmental Health &amp; Safety</td>
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<td>-------------------------------</td>
</tr>
<tr>
<td>Disaster Recovery</td>
<td>University IT, Information Systems Division</td>
</tr>
<tr>
<td>Business Continuity</td>
<td>Environmental Health &amp; Safety, Department Business Continuity Liaisons</td>
</tr>
</tbody>
</table>
Appendices

Appendix 1: List of Divisions

- Central Administration
- Eastman Institute of Oral Health
- Eastman School of Music
- Hajim School of Engineering
- Health Sciences
- Memorial Art Gallery
- River Campus Colleges
- School of Arts & Sciences
- School of Medicine & Dentistry
- School of Nursing
- Simon School of Business
- Strong Memorial Hospital
- UR Medical Faculty Group
- Warner School of Education
## Appendix 2: RACI Chart

- **R** = responsible
- **A** = accountable
- **C** = consulted
- **I** = informed

<table>
<thead>
<tr>
<th>Activity</th>
<th>Business Area Leadership</th>
<th>Business Area Liaison</th>
<th>BCM Program Staff</th>
<th>BCM Steering Committee</th>
<th>BCM Governance Committee</th>
<th>University Audit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop Policy and Standards for the BCM Program</td>
<td>I</td>
<td>I</td>
<td>R</td>
<td>R</td>
<td>A/I/C</td>
<td>I</td>
</tr>
<tr>
<td>Update Policy and Standards to meet regulatory and accrediting requirements</td>
<td>I</td>
<td>I</td>
<td>R</td>
<td>R</td>
<td>A/I/C</td>
<td>I</td>
</tr>
<tr>
<td>Communicating changes in policy and standard to business area representatives</td>
<td>I</td>
<td>I</td>
<td>R</td>
<td>R</td>
<td>I</td>
<td>I</td>
</tr>
<tr>
<td>Documenting business continuity/disaster recovery plans</td>
<td>A</td>
<td>R</td>
<td>C/I</td>
<td>C/I</td>
<td>I</td>
<td>I</td>
</tr>
<tr>
<td>Updating business continuity/disaster recovery plans</td>
<td>A</td>
<td>R</td>
<td>C/I</td>
<td>C/I</td>
<td>I</td>
<td>I</td>
</tr>
<tr>
<td>Training staff on business continuity/disaster recovery plans</td>
<td>A</td>
<td>R</td>
<td>C/I</td>
<td>C/I</td>
<td>I</td>
<td>I</td>
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<tr>
<td>Testing business continuity/disaster recovery plans</td>
<td>A</td>
<td>R</td>
<td>C/I</td>
<td>C/I</td>
<td>I</td>
<td>I</td>
</tr>
<tr>
<td>Training Business area leadership and business continuity liaisons on BCM concepts</td>
<td>I</td>
<td>I</td>
<td>R</td>
<td>R</td>
<td>I/A</td>
<td>I</td>
</tr>
<tr>
<td>Documenting tests and live event After Action Reports</td>
<td>A</td>
<td>R</td>
<td>C/I</td>
<td>C/I</td>
<td>I</td>
<td>I</td>
</tr>
<tr>
<td>Determining continuity and recovery strategies for the business</td>
<td>A</td>
<td>R</td>
<td>C/I</td>
<td>C/I</td>
<td>I</td>
<td>I</td>
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I = informed
Appendix 3: Revision History

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<th>Reviewer</th>
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<td>Document reviewed and approved; updated approval dates</td>
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<td>10/8/2021</td>
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<td>10/1/2021</td>
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</table>

Appendix 4: Contact Information

Please address any questions or concerns with any policies set forth within this document to the Business Continuity Management Program office: (avincent@safety.rochester.edu).