

Title:	Crisis Management and Business Continuity Plan
Effective Date:	January 2, 2020
Approved By:	President's Council
Responsible Party:	Chief of Staff
History:	N/A
Related Documents: Emergency Guidebook; Data Security Incident Response Plan	

I. PURPOSE

The purpose of this plan is to establish the management structure, responsibilities and procedures necessary for Salus to respond to a significant incident occurring on, or impacting, our campus. We recognize the value and necessity of planning for all phases of a crisis including, but not limited to, preparedness, mitigation, response, continuity, and recovery.

II. DEFINITIONS

Crisis Levels

Level 1 - Limited Crisis

Salus Departments regularly respond to routine incidents as part of their normal operations by using pre-established standard operating procedures both written and practiced. In most cases, a limited crisis is small enough that the affected department can effectively handle it. In other cases, it may require assistance from the Facilities Department and/or Department of Safety and Security. A Limited Crisis does not require the activation of the Crisis Management Team (CMT).

Level 2 – Issue Driven Crisis

These include issue driven and/or slowly developing situations that negatively affect Salus University. The incident may be severe and cause damage and/or interruption to our operations. A partial or full activation of the CMT may be needed. Salus may be the only affected entity. Examples of issue driven crises may include, but are not limited to: protests or disruptions; civil disturbances; unauthorized occupancy of campus areas; sexual assaults; controversial speakers; and hate crimes.

Level 3 – Major Crisis

An incident posing major risk to the university community that has caused or has the potential for causing fatalities or injuries and/or major damage. Such an incident is equivalent to a campus-wide state of emergency and requires activation of the full CMT. The CMT may request assistance from local, state and federal agencies. A Level 3 crisis may develop from incidents beginning at the Level 1 or 2 stages. Examples of major crises may include, but are not limited to: active shooter, infectious disease, fire, severe weather conditions, building failures, chemical releases, major civil disturbance or acts of terrorism.

Roles and Responsibilities

In a Crisis Response Structure, there are several essential groups and roles, including the Policy Group, Agency Administrator, Crisis Management Team and Incident Commander.

Policy Group

The President's Council (Small), includes the President, Provost, Chief of Staff, Vice President for Clinical Operations, Vice President for Finance, Vice President for Institutional Advancement and Vice President for Human Resources and Administrative Services, and meets regularly to address university business. During a Level 2 or 3 incident, the President's Council (Small) serves as the Policy Group, responding to questions or issues identified by the Crisis Management Team that require policy level decision-making.

Agency Administrator (AA)

The Chief of Staff serves as the Agency Administrator and is authorized to make emergency response decisions on behalf of the Policy Group. The AA has the following responsibilities:

- Authorizes activation (either partial or full) of the CMT
- Designates the Incident Commander
- Serves as the communication link between the Policy Group and the CMT
- Makes decisions and works in concert with the CMT regarding modifications to normal University operations
- Authorizes release of information to campus community and news media

In an anticipated absence or unavailability, the AA can delegate responsibility to another individual deemed capable of fulfilling the role. Unless otherwise delegated, in the absence or unavailability of the Chief of Staff, the succession of command shall be the Vice President for Finance, then the Vice President for Clinical Operations and then the Vice President for Human Resources and Administrative Services. The President retains the discretion to assume the AA responsibilities.

Crisis Management Team (CMT)

The Crisis Management Team includes the Chief of Staff, the Associate Provost, the Dean of Student Affairs, the Vice President for Human Resources and Administrative Services, the Chief Information Officer, the Vice President of Clinical Operations, the Director of Communications, the Facilities Director

and the Director of Safety & Security. The CMT is responsible for managing and directing response activities through communication, coordination, and resource management functions.

Incident Commander (IC)

The Incident Commander shall have the authority for development, implementation, and review of strategic decisions to facilitate university emergency response efforts and serves as the coordinator of the CMT with regard to a particular incident. The IC is responsible for the overall management of the incident and all activities and functions until the IC delegates and assigns them to members of the CMT. The IC will communicate closely with the AA (if the IC and AA are not the same person).

The IC will vary depending on the incident. The IC should be an individual with the specific skills, knowledge base, and training needed to manage the specific situation. It is always at the discretion of the Agency Administrator to identify an IC, or co-ICs, for an incident.

The IC has the following responsibilities:

- Provides overall leadership for incident response
- Assessment of incident situation
- Establishment of incident objectives
- Creation or approval of incident documentation
- Establishment of an appropriate organizational structure and delegation of authority or functions to others

IC responsibilities may be transferred in the course of incident response. This may be necessary for many reasons, such as changed circumstances or the prolonged nature of incident response

III. CONSIDERATIONS

This plan takes into account the following:

- A crisis incident may occur at any time, day or night, weekend or holiday, with little or no warning.
- The exact unfolding of an incident is not entirely predictable. Operational plans and procedures serve as guides and may require in-the-moment modification in order to meet the demands of an incident.
- Establishing and maintaining communication among the Salus community as well as with external partners is one of the highest priorities in any incident.
- Even though a plan such as this can never address every possible crisis, it defines a process for resolving most incidents.

IV. PROCEDURE

Core Principals and Priorities

A core principle of the National Incident Management System (NIMS) is that an incident should be managed at the lowest level possible, with only the amount of resources necessary to successfully respond to the incident. The AA is authorized to activate the CMT based on the AA's situational assessment or at the request of other CMT members. Notification of activation may be sent via email,

text, or phone call to CMT members. The AA can call for a full or partial activation of the CMT. Full activation includes all CMT members. Partial activation includes only those CMT members who will take part in incident response activities. CMT activation and response may also include engaging other subject matter experts who are not regular members of the CMT.

CMT activations take precedence over non-emergency response work activities and may interrupt normal day-to-day work and commitments of CMT members or others engaged in response activities.

It is the responsibility of the university to respond to a crisis in a safe, effective and timely manner. University personnel and equipment will be utilized to accomplish the following priorities:

Priority A: Protection of life and safety, including first responders

Priority B: Maintenance of life and safety and assessment of damages

Priority C: Restoration of normal operations

Emergency Operations Procedures

The Emergency Operations Procedures provide comprehensive procedures for the CMT to follow in the event of a Level 2 – Issue Driven Crisis for which the CMT has been activated and a Level 3 - Major Crisis.

Emergency Guidebook

Salus University's Emergency Guidebook provides emergency contact information and protocols for the university community to follow in the event of the following emergencies:

- Fire
- Chemical Spill
- Bomb Threat
- Suspicious Package
- Medical Emergency
- Shelter-in-Place
- Failure of Utilities/Phone/TLS/Elevator
- Hostage Situation
- Sexual Assault
- Evacuation/Evacuating Disabled
- Active Shooter
- Lockdown

Copies of the Emergency Guidebook are placed in public spaces throughout the university and can be found on the university website at salus.edu/Life/Safety-and-Security.

Data Security Incident Response Plan

This plan provides the framework for the university to respond to a data security incident.

Communications

The IC shall direct all situational emergency communications through the university's Alertus and Rave communication systems.

All other internal and external crisis communications shall be issued by the Department of Communications. The President, AA and Director of Communications are the only authorized crisis spokespeople for the university. To the extent feasible, (i) all internal crisis communications shall be reviewed by the President and the AA prior to their distribution and all (iii) external crisis communications shall be reviewed by the Chair of the Board of Trustees, President and AA prior to their distribution.

Documentation and After Action

Upon activation of the CMT, actions and decisions related to response effort should be documented throughout the duration of the response. Such documentation is to include tracking of all key decisions, actions and assignments, and will assist with preparation of an After Action Report compiled once the incident has concluded. The IC is responsible for incident documentation, including development of an Incident Action Plan, and for providing a mechanism to ensure that members of the CMT have access to such documentation.

Deactivation

The AA decides when the situation is under control and the CMT can be deactivated. The IC oversees demobilization planning and coordination and collection of incident documentation.

Business Continuity

After Priority A (Protection of life and safety, including first responders) and Priority B (Maintenance of life and safety and assessment of damages) are achieved, while addressing Priority C (Restoration of normal operations) these Business Continuity Principles shall govern:

- Recoupment of losses through business continuity insurance coverage
- Restoration of information systems through enactment of The Technology and Learning Resource Center Department's Disaster Recovery Plan
- In the event of crisis impacting portions of the university, the university shall seek to operate the
 non-impacted portions of the university and to relocate to the non-impacted portions of the
 university those operations that normally occur in the impacted portions of the university
- In the event of a crisis impacting portions of the university that cannot be relocated or that
 impacts the entire university, the university shall cease such partial or full operations until such
 time as an economically feasible alternative location or modality can be secured or the impacted
 portions of the university are restored
- During any such partial or complete cessation of operations, the university shall seek to minimize its expense structure to the extent that it can do so without jeopardizing the university's reputation and future revenue