Crisis Management for Really Busy People

Lee Painter, CISSP, HCISPP, CRISC, CCSFP
Principal Consultant
- **17+ years in Information Assurance and Computer Network Defense**
- **15+ years training customers on the need to understand and adopt best practices**
- **Experience as an Information Systems Security Officer for the Dept of Homeland Security**
- **Passionate Security Professional with a drive to provide not just knowledge but understanding**
- **Certified Information Systems Security Professional(CISSP)**
- **Certified Health Care Information Security and Privacy Practitioner(HCISPP)**
- **Certified in Risk and Information Systems Controls (CRISC)**
- **Certified Common Security Framework Practitioner (CCSFP)(HITRUST)**

Ahmed Salim, CHC, CHPC
Consultant

Profile

Ahmed is a Manager in the health care practice of Deloitte & Touche LLP. He is experienced in regulatory compliance, investigatory, assessments, and auditing and monitoring. Ahmed has served as a Compliance Officer for years, most recently as a Regional Director at a health system in Chicago. In this role, Ahmed was tasked with implementing new audit and monitoring processes, overseeing all investigations, coding and billing audits, and exclusion screening. He has worked to help create compliance programs by implementing and creating new policies and procedures for current regulations.

Ahmed has also served as Privacy Officer tasked with conducting privacy investigations, creating policies and procedures, completing privacy work plan items, conducting privacy assessments and audits and has served as chair of multiple Privacy and Security Committees. Ahmed has worked directly with the Office of Civil Rights (OCR) on investigations and has helped implement multiple EHR access monitoring systems to oversee daily privacy activity.

Ahmed is an author and frequent speaker on healthcare compliance, he has published and spoken on the topics of compliance program effectiveness and privacy. An alumnus of DePaul University and Western Michigan Law School, Ahmed earned his undergraduate degree in business administration and his Juris Doctorate. Ahmed is Certified in Healthcare Compliance (CHC) and Privacy Compliance (CHPC).

Education
- Western Michigan Law School, Juris Doctorate
- DePaul University, B.S. Business Administration

Other
- Member, Health Care Compliance Association (HCCA)
- Certified in Healthcare Compliance (CHC) by CCB (active)
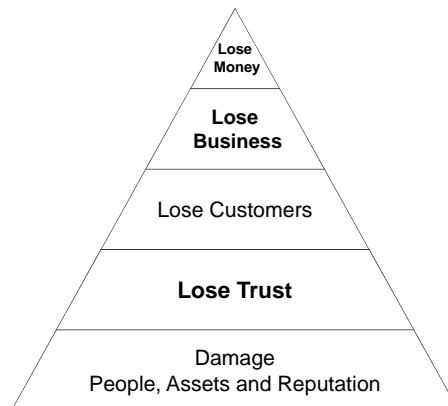- Certified in Healthcare Privacy Compliance (CHPC) by CCB (active)

Characteristics of a Crisis

- ► Element of surprise
- ► Insufficient information
- ► Inability to get timely data
- ► Accelerating flow of events
- ► Loss of control
- ► Highly stressful
- ► Communication breakdowns

Potential Crises

Economic Crises	Natural Disasters	Criminal Crises
Recessions	Earthquakes	Product tampering
Stock market crashes	Floods	Kidnappings
Hostile takeovers	Wild fires	Hostage situations
Political risk	Tornadoes	Acts of terrorism
War	Hurricanes	Bomb threat
		Extortion
Personnel Crises		
Work stoppage	**Physical Crises**	
Workplace violence	Industrial accidents	**Reputation Crises**
Discrimination	Supply chain disruptions	Libel/slander
Catastrophic injuries	Product failures	Malicious rumours
Fatality	Explosions	Boycotts
	Industrial fires	Loss of GSLT member
Information Crises	Major power disruption	
Breach/theft of confidential information	Activist protest/blockade	
Fraud	Environmental catastrophe	
Cyber attacks		

Why Crisis Management Matters

Lose Money

Lose Business

Lose Customers

Lose Trust

Damage People, Assets and Reputation

"40% of businesses that experience a disaster will no longer be in business in five years"   Gartner, *Insight for the Connected World*

Six Steps to Crisis Preparedness

- Program initiation and planning

- Assess Your Risks

- Develop a Media and Communication Plan

- Develop the Crisis Management Plan

- Training and implementation

- Testing and maintenance

Program initiation and planning

Program initiation and planning

- ▶ Understand the organization
- ▶ Conduct planning meetings with management of each function
- ▶ Determine objectives and core services provided by each function
- ▶ Assign crisis team membership
- ▶ Identify key processes and interdependencies
- ▶ Develop a focused and prioritized work plan

Appoint Your Crisis Management Team

- ▶ Name individuals to applicable roles
  - – Team Leader
  - – Team Coordinator
  - – Communications
  - – Deputies
  - – Functional owners
    - • Human Resources
    - • Communications
    - • Environmental, Heath and Safety
    - • IT
    - • Finance
    - • Security
- ▶ Communicate team membership
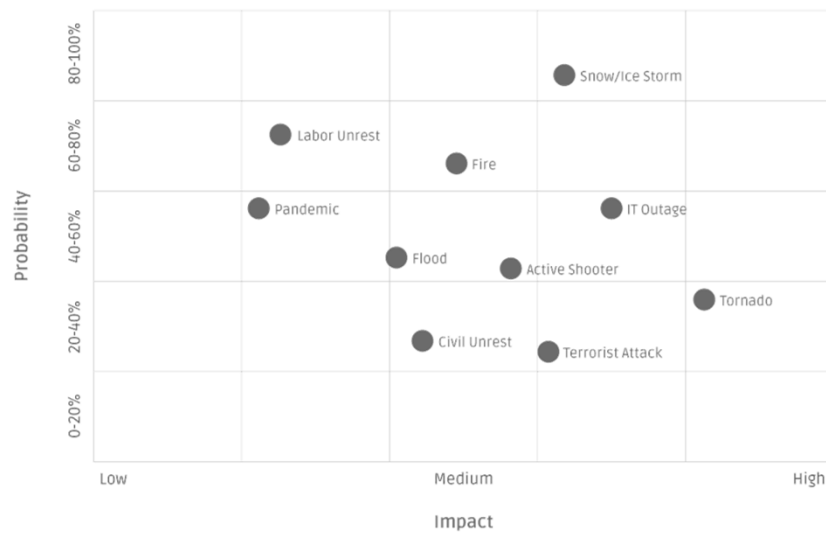- ▶ Update contact list **quarterly** and communicate it effectively

Identify and Document Key Contacts

- Global Security Hotline
- Police, fire and emergency services
- Local politicians
- Government agencies
- Key customers and suppliers
- Public relations agency
- Industry associations
- Alternative suppliers
- Stress and counseling services
- Logistics companies
- Product testing labs
- Etc., etc.

Assess Your Risks

Assess Your Risks

▶ Identify and evaluate risks based
on the objectives and core services

▶ Consider current mitigation strategies and
evaluate effectiveness

▶ Prioritize risks based on impact
and likelihood

▶ Consider:

– Threats and hazards to the organization's most
time-sensitive resources

– Single points of failure

– Concentrations of critical skills

– Outsourced vendors and suppliers

Probability (vertical axis): 0-20%, 20-40%, 40-60%, 60-80%, 80-100%

Impact (horizontal axis): Low, Medium, High

- Snow/Ice Storm
- Labor Unrest
- Fire
- Pandemic
- IT Outage
- Flood
- Active Shooter
- Tornado
- Civil Unrest
- Terrorist Attack

Develop a Media and Communication Plan

Develop a Media Plan

- ▶ With Corporate Communications
  - – Define responsibilities
  - – Create a contact sheet to provide to the media
- ▶ Identify a spokesperson
- ▶ Train the spokesperson
- ▶ Identify a media staging area
- ▶ Ensure your statements and press releases are appropriately approved

Develop a Notification Process

- ▸ Document the process

- ▸ Communicate the process often

- ▸ Test the process regularly

- ▸ Consider after hours notification

- ▸ Determine how employees will be notified
  not to come to work in the event of a
  weather emergency or site closure

Develop the Crisis management plan

Develop continuity plans

- ▶ Develop a clear chain-of-command and back-ups for each member of the team

- ▶ Identify and document a site profile and critical contact list

- ▶ Develop strategies to meet identified recovery time objectives

- ▶ Document resources needed to execute the crisis management strategies

- ▶ Consider offsite locations and access to information if primary is inaccessible

Establish a Crisis Room

- ▶ On site and off-site in case of a site evacuation
- ▶ Equipment may include
  - – Telephones
  - – Computers with network connectivity
  - – Printers
  - – Fax machine
  - – Two-way radios, if applicable
  - – Cell phones, extra batteries and chargers
  - – Battery operated radio
  - – Television
- ▶ Materials may include
  - – Crisis Management plan
  - – Crisis contact list
  - – Personnel lists, including contractors
  - – Material safety data sheets (MSDS)
  - – Site drawings
- ▶ Have a "Go Box" with all the above equipment and materials when you have to leave your site in an evacuation (when you have to GO)

Training and implementation

- ▶ Every member of the crisis team needs to attend training and all employees should have a general awareness of the plan
- ▶ Ensure all members of the crisis team have a clear understanding of their roles and responsibilities
- ▶ Don't forget training for:
  - – Security staff (if applicable)
  - – Administrative assistants, receptionists and switchboard operators
  - – New hires

Testing and maintenance

Testing and maintenance

- ▶ The plan should be tested and maintained at least annually

- ▶ Actual table top or full mock crisis can be effective ways of building team member skill sets and confirming the plan actually executes as intended on paper

- ▶ Proactively update the plan to account for changes in the organization's structure or key processes more frequently if necessary

Exercise the Plan

▶ Is the plan simple?
▶ Is the plan effective?
▶ Are the key contacts current?
▶ Can critical information be accessed?
▶ Are communications sound?
▶ Is there a timeline for completing after action report items?
▶ After training – <u>improve</u> your plan

What are the Critical Items I Need to Remember?

▶ Have a Crisis Management plan

▶ Appoint a Crisis Management team (including the plan owner)

▶ Conduct a risk assessment

▶ Update the plan's key contacts **quarterly**

▶ Ensure your communications are sound

▶ Test the plan at least annually

Thank you!