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**Emergency Operations**

**Business Continuity Planning 2025**

*Mitigation, Preparation, Response & Recovery*

# Introduction:

Tornadoes, earthquakes, floods, oil spills, terrorist acts, blizzards and pandemics – the list of disasters is endless and continues to grow. The disruption to life and to productivity can be devastating but the impact can be lessened if we make the effort to develop and test plans to respond to emergencies. Emergency Operations/Business Continuity planning is the process of preparing for, mitigating, responding to and recovering from an emergency. It is a dynamic process and planning, although critical, is only one component of the recovery from a condition imposed upon the organization from outside. Training, testing and coordinating activities within the organization are also important to ensure that NSM continues to provide quality care to our clients, even in extreme circumstances.

By reviewing the following materials and using the planning worksheets, each NSM location will develop their own unique, location specific Emergency Operations/Business Continuity Plan. Situations that the location might realistically face will be addressed and prioritized so that each location has a plan that applies to their area. The plan can then be shared and discussed so that every employee knows how to respond if faced with an emergency.

Once the plan is developed and discussed, a copy must be sent to the Compliance Department to be kept on file. Each year, an Emergency Operations drill must be conducted by all locations. This drill will require that every employee be aware of and be able to communicate his or her role in the response to an emergency. Portions of the plan, when feasible, should be put into real-time action and a review of the location’s response must be performed. These drills must include scenarios that ***test the plan as close to the breaking point as possible***. The intent is to demonstrate how well the plans work in the event of an actual emergency that would cause disruption of service and to determine if there are any areas that need improvement. ***Performing a drill where nothing went wrong, and no assistance was needed, is not enough.*** For example, a tornado drill where everyone went to a safe space until the storm passed but no damage occurred is **not** a sufficient test of the plan. A drill where the building was damaged or transportation was affected that include seeking assistance from the home office, your Operations team and/or other branches would better test your plan. If the location experiences an actual emergency in the current calendar year that requires activating the full Plan, a Post Event Review may take the place of performing a drill.

To develop your location’s unique plan, use the information below to complete the worksheets which will form your plan. Please contact the Compliance Department if you need assistance. ***Involve all employees in creating the plan, including those who work remotely***.

**When your plan is complete, share it with all employees at a location meeting, complete the EOP in-service form and submit that to the Compliance Department, along with a copy of the completed plan.**

Being prepared will help NSM continue to provide safe, quality care to our clients, even in the event of an emergency. The following information will assist you in creating an effective plan.

# Scope:

This EOP is designed to address natural and human-caused hazards that could adversely affect NSM. It covers the full range of complex and constantly changing requirements in anticipation of or in response to threats of or actual disasters and emergencies. It describes the fundamental policies, strategies, and general concept of operations to be used to control the emergency or disaster from its onset through the recovery phase.

This EOP applies to all NSM locations within the US and to all NSM employees participating in mitigation, preparedness, response, and recovery efforts.

It is the responsibility of all NSM employees to read and understand the EOP; to integrate their departmental procedures and emergency management activities in support of the EOP; and to participate in training exercises.

The EOP outlines the expectations for NSM employees; roles and responsibilities; direction and control systems; internal and external communications; and training and maintenance of the Plan.

At a corporate level, Business Continuity Plans of key suppliers and any subcontractors will be reviewed to ensure clarity on the alternate steps to take in the event of a disruption in their operations.

# Assumptions and Conditions:

Incidents will typically be handled at the lowest organizational level possible – e.g., by branch, region, etc. Because NSM branches and locations are situated throughout the US, in most cases and depending on the type of emergency, the local manager or their designee will be the Emergency Coordinator.

It is possible for a major disaster to occur at any time and any place in or near one or more NSM locations. While in some cases, timely dissemination of warnings and increased readiness measures may be possible, many disasters occur with little or no warning.

NSM leadership recognizes and understands their responsibilities for the safety and welfare of employees, clients and visitors; and they embrace their responsibilities in the implementation of this EOP.

Any employee of NSM may be tasked by this EOP and is obligated to respond accordingly. Employees tasked with NSM emergency responsibilities may need to attend to the immediate safety of their own families in the early stages of a widespread emergency. In that case, other NSM resources can be requested to assist the location. Other NSM resources can also be requested if the nature of the incident goes beyond or overwhelms the capacity of one location’s resources.

Local emergency response resources, including police and fire support, will be notified in emergency situations affecting NSM location(s), although in a community-wide disaster, those resources may be constrained.

Hazardous conditions may continue for some time following a major disaster thereby increasing the risk of casualties.

Daily operations that do not contribute directly to NSM’s response to an emergency may be suspended for the duration of any emergency and those operational resources may be re-directed to support the emergency response.

Effective implementation and proper understanding of this EOP through periodic training and exercises will enhance NSM’s ability to respond during an emergency.

# Considering the Impact

The Business Impact Analysis reviews the operational impacts resulting from disruption of business functions and processes. Because NSM has locations throughout the country, with data centralized and redundancy systems in place, the EOP is designed to minimize disruption to client services.

Resources from other locations can be utilized to provide communication and continued services until affected location operations are restored. While internal expenses, such as overtime labor and equipment transportation costs, may be incurred, the impact would be spread across locations so no individual location would be at risk of permanent closure due to increased costs.

Centralization and redundancy of data minimizes loss of work in progress. Intake and processing can continue without disruption by shifting services to other locations to minimize the effect on client service.

Centralization and redundancy also serves to protect ePHI during and after an emergency or disaster.

## POTENTIAL EMERGENCIES AND DISASTERS

An emergency is an unexpected or sudden event that significantly disrupts NSM’s ability to provide care, or the environment of care itself, or that results in a sudden, significantly changed or increased demand for our services. Emergencies can be either man-made or natural (such as an electrical system failure or a tornado), or a combination of both, and they exist on a continuum of severity. A disaster is a type of emergency that, due to its complexity, scope, or duration, threatens NSM’s capabilities and requires outside assistance to sustain patient care, safety, or security functions.

The most common types of emergencies or disasters are listed below. This list cannot be all-inclusive but will serve as a starting point for each location to determine the most probable types requiring attention. ***Each location should discuss which situations are likely to occur in their area.*** The most likely ones should then be checked on the planning worksheet and prioritized by the likelihood and potential severity. The most likely situation for your location should be listed as #1, with the least likely last on your list.

* **Weather/Natural Disasters** Extremes of weather pose the least predictable but most probable of the types of emergencies that locations will encounter. The likelihood and history of weather affecting a location of National Seating & Mobility is a known vulnerability. We are susceptible to heavy rains/flooding, ice storms/blizzards, hurricanes along the coasts and tornadoes in the central states, tsunamis and volcanoes in the islands, lightning strikes and high winds everywhere.
* **Pandemics/Public Health Emergencies/Influx of Potentially Infectious Clients**

An influx of infectious clients can also pose a risk to normal operations. An influx of potentially infectious clients may result primarily from two causes:

* Naturally occurring epidemic or pandemic (Coronaviruses, Measles, Influenza, Candida, Hepatitis B, C, and A, and HIV)
* Bioterrorism (Anthrax, Smallpox, plague, etc.)

NSM’s response to an emergency of these types will be based on the severity of the outbreak and the risk to NSM employees, their families, and the need to avoid passing infections from client to client. All NSM staff in affected areas will be notified of the potential health risks to them and their families. Staff who are pregnant or have compromised cardiac, respiratory, or immune systems, or other conditions that may place them at additional risk from infection may choose or may be directed to avoid client contact during these emergency situations.

The most significant level of infectious situation is indicated by a health-related declared emergency, such as:

* a public health emergency declared by federal, state or local governments with or without activation of the community’s Emergency Management Plan
* a state of emergency in a specific region, county, city, town declared by the Governor, or other governmental official.

NSM’s response to these types of declared health related emergencies will be to follow all our infectious disease protocols as well as those instituted as part of the public health emergency. Those could include enhanced personal protective equipment, such as gloves, goggles, disposable gowns, shoe covers, face shields, face masks, etc. NSM senior management may decide to adjust or limit client contact, change service delivery methods, or stop providing equipment and services until the emergency passes.

The local or area Manager, through broadcast and printed media as well as through postings on the internet, will monitor developing situations and communicate with all Branch employees as well as with NSM senior management. The websites for the CDC and/or local health authorities should be monitored on a regular basis to maintain awareness of possible outbreaks. Senior management will also monitor information to determine a national response when necessary.

* **Hazardous Materials** Hazardous Materials are part of the environment in any workplace. The accidental spilling or injury from mishandling or misuse is always possible in the course of operations conducted by the staff. Once an incident occurs, immediate action to mitigate the effects of the incident is required. Prior knowledge is the best preparation. Educating every staff member in the use of Safety Data Sheets and the location of that information is not only required by law but also responsible behavior. National Seating & Mobility does not store large quantities of chemicals. However, neighboring businesses may, so each location should be aware of the types of activities nearby. A spill close to the location could have a direct effect on the branch’s business activities.
* **Fire** Regardless of the diligent application of prevention and policies, fire is always possible. However, the probability can be reduced through education and proper housekeeping methods such as:
  + proper storage of combustible materials at safe distances from flammables
  + removing packing materials immediately
  + maintaining an uncluttered warehouse and office
  + emptying waste cans when full or nightly
  + eliminating combustibles from the workplace or storing them in metal containers
  + maintaining unobstructed access to electrical boxes and breakers
  + limiting the use of extension cords with electrical equipment
  + using power bars with surge protection
  + maintaining fire extinguishers in operable condition, of the proper type, and in enough numbers to eliminate outbreaks of fire or to enable the staff to exit safely.

The development and dissemination of an evacuation plan for the premises and the training and testing of the staff in its implementation is the key factor to maintain the safety of the staff.

Planning for the recovery from a fire is a much more difficult proposition. Prevention of permanent loss of data concerning clients and operations has to be planned for in the form of backup systems and relocation and duplication of those backup systems. The majority of NSM’s client relevant data is centrally located on our server, which is backed up on a regular schedule. The local NSM office must be responsible for safe storage of the paper documents, though, in the event of data loss of a widespread nature.

* **Data Loss**. Data loss due to a disaster or illegal intrusion, such hacking, ransomware or phishing, is a possibility. The data required to carry on day-to-day operations is maintained on a central system and automatically backed-up and stored in an industry-standard data back-up system. In case of irrecoverable, catastrophic data loss, the response would be to revert to a manual system of service delivery, with re-input of available data being accomplished at the earliest possible time. Our Recovery Time Objective in the event of an irrecoverable, catastrophic data loss is to resume functionality within 24 hours. The maintenance of backup data is paramount to recovery. Timely scanning of manual records prevents complete loss of documentation. Manual records not scanned could not be replaced if destroyed at National Seating & Mobility.

To assist in the event of data loss, internet outages or phone outages, part of your plan must include notifying the IT Department/Tech Support right away. Data loss or outages should not have long term consequences provided the staff is aware of and is using the system for reacting to outages or other interruptions.

* **Electrical Power Outages**. Electrical power outages, whether regional, local, short or long term will adversely affect the conduct of service operations. This threat exists mostly as a result of weather, utility company vulnerability, client residence vulnerability, and equipment failure – most of which are not predictable nor within our control. Outages could be short-term or long-term and the plan should provide for both situations.
* **Local Area Disasters**. Local area disasters may include but are not limited to events which, while not predictable, are possible. These events may include earthquakes, flooding, chemical and fuel spills, ruptured gas mains, airplane crashes, terrorist attacks, riots, and other spontaneous events, which will disrupt, or hinder, normal operations. Each location manager is responsible for touring the area surrounding the location to identify neighbors who could pose a risk, infrastructure (such as airports, railway tracks, highways/interstates) that could experience events that could affect the location, and storage or production of hazardous materials that could have an effect on the location in the event of their own incident.
* **Violence in the Workplace**. Violence in the workplace may include bomb threats, threats of physical assault with or without a weapon made by both non-employees and employees. Responses to potential violent acts are addressed in the worksheet/plan.

While these events may or may not create widespread disruption of service, if the event occurs at or in the vicinity of National Seating & Mobility, it will likely present limitations on our ability to operate normally. Each event will have to be addressed in its own context. The dangers that each presents to the location, the staff, and/or our ability to access or egress the location must be entered onto the worksheet and discussed and planned for.

Events occurring in other communities may limit our ability to access clients beyond our ability to help. Remaining informed of the situation through local media and contact with local emergency services will enable us to determine if and where we may help our clients and those local services.

## RECOVERY OPERATIONS

Depending on the nature of the emergency, different steps must be taken to respond. However, in general, the following are steps that should be considered based on the impact of an event. The list is not all-inclusive. These and any other steps determined by the location should be entered on the Emergency Operations Plan worksheet, which will then serve as the individualized Plan for each location.

* An Emergency Coordinator will be designated at each location. This person will typically be the Manager or other local senior management and will be the lead person for all emergency and recovery operations.
* For all emergencies, the first step for the employee first experiencing the event is to get themselves and others to safety, then to contact the Manager and/or Emergency Coordinator. The Coordinator is to contact their Area Manager or Regional Area Director to inform them of the situation and to obtain assistance in activating the Emergency Management plan. If the Area Manager or Director is unavailable, your Regional Vice President should be contacted. The next step for the coordinator is to contact the local employees and provide direction in carrying out the plan.
* Employees should contact the Emergency Coordinator or stay alert for communication from the Coordinator, depending on the time, location and nature of the emergency. If an employee is unable to contact the Coordinator, they should contact their Regional Area Director for direction. If the RAD is unavailable, the next contact would be the DVP.
* Each branch employee’s contact name and numbers should be entered onto the worksheet to be included in the final plan. The DVP and the RAD’s contact information should be listed along with a phone roster for the location’s employees.
* Employees’ safety is of paramount importance. As such, employees should not report to work or engage in activities that put them in at-risk situations. If only a limited number of staff can report to work, employees may be asked to perform additional/different functions.
* When travel is safe, but the location will remain closed for any length of time, a sign should be posted on the door of the building providing a contact phone number for both clients and NSM employees to use for updated information.

# Contact Information/Lists

A list of local contact numbers should be created and entered onto the worksheet. The list should include any local numbers that might need to be utilized including the location landlord or property management, the local Police, Poison Control, the National Response Center for Toxic Chemical and Oil Spills, utilities such as power, phone and gas providers, the local City Hall or County Government offices, and any other local agencies that might be of assistance in the event of an emergency.

Alternative service sources should be listed to be used in the event of an emergency that causes the location’s services to be disrupted for a long period of time. In such a situation, clients may need to be referred to other providers for timely service. Alternative sources can include other NSM branches nearby or other companies who provide the same or similar services who were not affected by the emergency.

**All of these lists should be provided to every location employee and should be posted in a common area that can be easily accessed.**

# Next Steps

* In the event of an emergency, the DVP or RAD will notify other NSM branches and locations, and other Home Office departments of the situation to assist them in answering any calls that they may receive from clients. If necessary, phone calls will be re-routed to either a cell phone if service is available, or to another branch or to the home office.
* If appointments need to be rescheduled, clients will be contacted either by cell phone or by remote employees, depending on the outage. If clients need service that NSM is currently unable to provide, they will be directed to the alternative service source.
* Other communication to clients, such as updates on the status of the branch or alternate service locations, may be made via broad or area specific text messaging and/or email systems if the client has not opted out of text messaging. Clients can be directed to mynsmorder.com for updated status. Clients can also be evaluated via Rescue Lens remotely in the event there is no local resource immediately available.
* If local data is unavailable or compromised, Home Office personnel will assist Branch/other location employees in accessing data that might be needed. Employees impacted by the emergency may be directed to move, as soon as reasonably possible, to a paper system for scheduling and client documentation.
* If the NSM location will not be functional for an extended period of time, the DVP and/or RAD and the Manager will explore options and secure alternative work sites, if necessary. An alternative work site could be another location nearby, another branch or employees could be directed to work from home. If the building is damaged, the local manager and the DVP will alert the appropriate insurance companies and schedule inspections. If possible, the Emergency Coordinator should take pictures of the damage. The appropriate repair/cleaning services will be identified and notified as needed. If the damage puts equipment or information at risk, security solutions will be identified and engaged.
* If Internet and/or cellular service is unavailable, the DVP and/or RAD will coordinate having appropriate resources sent to the Branch/Location. Alternate services will be explored and secured if available. The DVP and/ or RAD will work with IT to facilitate/monitor service recovery.

***Now that the most common situations and possible responses have been reviewed, it is time to develop your location’s unique plan. Complete the worksheet and be sure to involve all employees in creating the plan.***

***Having everyone involved and informed will help NSM to continue to provide safe, quality care to our clients, even in the event of an emergency.***