

University Policy

Applies to: Units, employees, contractors, and suppliers

Responsible Office

Office of Business and Finance

POLICY

Issued: 07/01/2020

The university values **business continuity** and recognizes the serious impact that **disruptions**, such as natural or human-made disasters, can have on its community members and the continuation of its business operations. During such disruptions, maintaining the **critical functions** that support the university mission is essential. The Business Continuity Management Office in the Office of Business and Finance is responsible for directing **business continuity management** (**BCM**) for the university and **units**.

Purpose of the Policy

To set requirements for BCM, maintain continued availability of critical functions, and align university practices with BCM industry standards.

Definitions

Term	Definition			
BCP testing exercise	Method used to test the validity of business continuity solutions and documented procedures in the BCP for			
•	relevance, completeness, and being current.			
Business continuity	The strategic and tactical capability of the university to plan for and respond to disruptions and to continue			
	operations at an acceptable predefined level.			
Business continuity	Holistic management process that identifies potential threats to the university and the impacts to operation			
management (BCM)	those threats, if realized, might cause. Provides a framework for building organizational resilience with the			
	capability of an effective response that safeguards functions and processes critical to the university			
	mission.			
Business continuity	Part of the overall management system that establishes, implements, improves, operates, maintains,			
management system	monitors, and reviews business continuity.			
Business continuity plan	Documented procedures that guide the university to recover, resume, and restore to a pre-defined level of			
(BCP)	operation following disruption.			
Business continuity	The individual identified by the unit leader who represents, leads, and is accountable for ensuring unit BCM			
representative (BCR)	activities are completed.			
Business impact analysis	The process of analyzing activities and the effect that an operational disruption might have upon them. The			
(BIA)	BIA lists critical functions and gives guidelines on tolerable down time.			
Critical function	Process or function that cannot be interrupted or unavailable for more than a mandated or predetermined			
	timeframe without significantly jeopardizing the university mission.			
Disruption	Event that interrupts normal business functions and operations, whether anticipated (e.g., flood, tornado) or unanticipated (e.g., blackout, technology failure).			
Exception	Any violation of or noncompliance with a university policy issued by the Office of Business and Finance			
	(Business and Finance).			
Health System	University Hospital, East Hospital, Brain and Spine Hospital, Richard M. Ross Heart Hospital, Harding			
	Hospital, Dodd Rehabilitation Hospital, Ambulatory Clinics and Services, and Arthur G. James Cancer			
	Hospital and Richard J. Solove Research Institute and Outreach Sites.			
Unit	College or administrative unit.			
Unit leader	Head of college or administrative unit (e.g., dean, senior vice president, president, provost).			
Waiver	Permission granted to a unit to operate differently than specified or required by a university policy issued by			
	Business and Finance.			



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Policy Details

- I. The university is committed to ensuring the continuity of teaching, learning, research, outreach and engagement, student life experiences, patient care experiences, business operations, and the critical functions that support them by:
 - A. Establishing and proactively maintaining a **business continuity management system** to ensure services are delivered at acceptable levels during a disruption.
 - B. Striving for continual improvement in BCM processes to increase resilience and minimize the impact of a disruption on the university community and other stakeholders.
 - C. Identifying critical functions and resources (e.g., information technology, people, physical plant, supply chain) to ensure continuity.
 - D. Supporting the safety of faculty, staff, students, patients, and visitors, and the efficient recovery and effective restoration of university community capabilities.
 - E. Providing a coordinated, efficient, and prioritized response and decision-making path to effectively manage disruptions that pose a threat to the university fulfilling its mission.
- II. Units must establish a **business continuity plan (BCP)** that complies with the requirements established by the Business Continuity Management Office.
- III. Contractors and suppliers may be required to provide a BCP as required by the Business Continuity Management Office.

PROCEDURE

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- I. Business Continuity Management Office
 - A. The Business Continuity Management Office develops and communicates BCM program requirements, tracks and measures compliance, and drives improvement of the BCM program.
 - B. The Business Continuity Management Office works with units to ensure the continuation of critical functions that are aligned with the university community's requirements and risk levels as identified during the **business impact analysis (BIA)** and risk assessment processes.
 - C. The Business Continuity Management Office will annually collect from units (e.g., Education and Human Ecology, Office of the Chief Information Officer, Optometry, Student Life) the recovery time objectives (RTOs) and recovery point objectives (RPOs) for the systems/applications for which the units are responsible.
 - D. The Business Continuity Management Office will annually provide the gap report of operational need versus systems and applications (dependencies) capability.
 - E. The Business Continuity Management Office leads business continuity planning with support from **business continuity representatives (BCRs)** to:
 - 1. Minimize the impact of and restore the university community back to normal in the case of a disruption;
 - 2. Standardize the methods and tools used to identify and prioritize risks and recovery times, and to quantify the impact of disruptions when possible;
 - 3. Provide tools for effective BCM communication, exercises, and training; and
 - 4. Identify when business continuity planning and risk mitigation efforts are not adequately resourced.
- II. Business Continuity Management Steering Committee
 - A. The Business Continuity Management Steering Committee (Steering Committee) serves as the advisory committee for BCM.
 - B. The Steering Committee will report to the Risk Management Committee annually or as needed.



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- C. Steering Committee membership will consist of representatives from the four college clusters (arts and sciences, professional, health sciences, and regional campuses), Emergency Management, Environmental Health and Safety, **Health System**, Human Resources, Enterprise Security Disaster Recovery, Research, Student Life, Office of Marketing and Communications, and others as identified by the Business Continuity Management Office.
- D. The Business Continuity Management Office chairs, convenes, manages, and sets responsibilities for the Steering Committee.

III. Business Continuity Plans

- A. BCPs must be reviewed, updated, and approved by **unit leaders** each fiscal year or more frequently when there are significant changes to personnel, premises, suppliers, etc., that impact the critical functions of the unit.
- B. Units must conduct **BCP testing exercises** every two years or as determined by the Business Continuity Management Office. The type of exercise to be completed by each unit will be determined by the Business Continuity Management Office and the unit based on impact, priority, and risk, and will be one of the following:
 - 1. Live (simulation);
 - 2. Real world (i.e., actual event);
 - 3. Review (discussion based); or
 - 4. Scenario (tabletop).
- C. The Business Continuity Management Office will publish a performance scorecard and distribute it regularly to the BCRs, unit leaders, Risk Management Committee, and Business and Finance. An annual update of the BCM program will be provided to the President's Cabinet and the Board of Trustees as appropriate.

IV. Unit Leader Responsibilities

- A. Unit leaders are accountable for BCM for their units.
- B. Unit leaders must:
 - 1. Appoint a BCR to lead and support unit business continuity activities;
 - 2. Ensure the development, annual maintenance, and testing of the BCP;
 - 3. Approve the BCP; and
 - 4. Review the performance scorecard and drive continuous improvement to close performance gaps.
- C. Unit leaders must ensure that the unit:
 - 1. Develops, maintains, and exercises the BCP to cover critical functions that must be continued should there be a disruption;
 - 2. Completes a BIA every two years or more often if needed;
 - 3. Completes a risk assessment every three years or when significant changes in operational processes or infrastructure occur; and
 - 4. Provides annually to the Business Continuity Management Office the RTOs and RPOs for the systems/applications for which they are responsible, whether used solely by the unit itself or by other units.

V. Business Continuity Representative (BCR) Responsibilities

- A. Partner with the Business Continuity Management Office to fulfill their responsibilities.
- B. Lead and coordinate BCP development, maintenance, and testing for the unit.
- C. Lead, coordinate and complete the BIA to identify, prioritize, and determine criticality using the BCP tool.
- D. Conduct a risk assessment to rate impact of critical functions for the unit, quantifying impact as much as possible.
- E. Lead efforts to develop business continuity strategies based on worst case assumptions including and not limited to loss of:
 - 1. Applications and/or systems (e.g., alternative storage, back-up of systems, manual workaround);



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- 2. Building or workspace (e.g., alternative site, assessment, proximity, square feet, time for relocation in and out, utilities);
- 3. People (e.g., experience, procedures, skills, training); and
- 4. Supplier and/or supply chain (e.g., special procedures for research, suppliers, third parties).
- F. Develop procedures for the initial, contingency, and recovery phases of a disruption.
- G. Use required business continuity planning tools and methodologies.
- H. Act as the liaison between the unit and the Business Continuity Management Office.
- I. Participate in Business Continuity Management Office meetings and communicate information back to the unit
- J. Review the BCM performance scorecard to ensure adherence to required performance levels.
- K. Participate in required BCM training and provide unit support as needed.
- L. Drive continuous improvement.
- M. Share lessons learned.
- VI. **Waivers** to this policy must be approved in advance and documented by the Office of Business and Finance, using the <u>Business and Finance University Policy Waiver Request</u>.

VII. Policy Violations

- A. All policy violations must be tracked as an exception.
- B. The university may require successful completion of training.
- C. The university may enforce corrective action, up to and including termination, in accordance with applicable policies or rules.
- D. The university may seek restitution, as appropriate.
- E. Criminal charges may be filed, as appropriate.

Responsibilities

Position or Office	Responsibilities		
Business Continuity Management Office	 Develop and communicate BCM program requirements, track and measure compliance, and drive improvement of the BCM program. Collect annually from units the RTOs and RPOs for systems/applications. Provide annually the gap report of operational need versus systems and applications (dependencies) capability. Lead business continuity planning with support from units and BCRs as set forth in this policy. Chair, convene, manage, and set responsibilities for the BCM Steering Committee. Publish a performance scorecard and distribute it regularly to the BCRs, unit leaders, Risk Management Committee, and Business and Finance. Update the President's Cabinet and Board of Trustees annually on the BCM program as appropriate. 		
Business Continuity Management Steering Committee	Serve as the advisory committee for BCM. Report to the Risk Management Committee annually or as needed.		
Business Continuity Representative	 Partner with the Business Continuity Management Office to fulfill responsibilities. Lead, coordinate, and complete unit BCP development, maintenance, and testing as set forth in this policy. Coordinate and complete BIAs and risk assessments as set forth in this policy. Liaise between unit and Business Continuity Management Office. Review performance scorecards, participate in training, provide unit support, drive continuous improvement, and share lessons learned. 		
Contractors/suppliers	Provide a BCP as required by the Business Continuity Management Office.		
Office of Business and Finance	Approve in advance and document policy waivers.		
Unit	Establish and maintain a BCP that complies with the requirements established by the Business Continuity Management Office.		



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	 Conduct BCP testing exercises as set forth in this policy. Complete BIAs and risk assessments as set forth in this policy. Provide RTOs and RPOs to the Business Continuity Management Office as set forth in this policy. 			
Unit leader	 Review, update, and approve BCPs as appropriate. Appoint a BCR to lead and support unit business continuity activities. Review the performance scorecard and drive continuous improvement to close performance gaps. Ensure that the unit develops and maintains a BCP, completes BIAs and risk assessments, and provides RTOs and RPOs to the Business Continuity Management Office as set forth in this policy. 			

Resources

University Policies, policies.osu.edu

Disaster Preparedness and University State of Emergency 6.17, hr.osu.edu/policy/policy617.pdf Information Security Incident Response Management, go.osu.edu/infosec-isirmp Weather or Other Short-Term Closing 6.15, hr.osu.edu/policy/policy615.pdf

University Resources

Business and Finance University Policy Waiver Request, go.osu.edu/busfinpolicywaiverrequest Business Continuity Plan Requirements, <u>busfin.osu.edu/sites/default/files/bcp-requirements.pdf</u> Financial Code of Ethics, <u>busfin.osu.edu/sites/default/files/financial-code-of-ethics.pdf</u> Information Security Control Requirements (ISCR), go.osu.edu/infosec-iscr Security Framework, <u>it.osu.edu/security/policies/security-framework</u>

External Business Continuity Management Resources

Business Continuity Institute, thebci.org/

Disaster Recovery Institute, drii.org/

Environmental management guides, standards, and technical reports of ISO 14000, <u>iso.org/iso-14001-environmental-management.html</u>

IT Disaster Recovery Alignment with ISO 22301, <u>riskonnect.com/business-continuity-resilience/using-iso-27031-to-guide-it-disaster-recovery-alignment-with-iso-22301</u>

Occupational health and safety management systems of ISO 45001, <u>iso.org/iso-45001-occupational-health-and-safety.html</u>

Security and resilience – Business continuity management systems – Requirements, <u>iso.org/standard/75106.html</u> Societal security – Terminology, <u>iso.org/standard/56199.html</u>

Contacts

Subject	Office	Telephone	E-mail/URL
Policy and BCM issues	Business Continuity Management Office, Office of Risk Management, Office of Business and Finance	614-688-7452	BCM@osu.edu busfin.osu.edu/university-business/risk- management/business-continuity- management

History

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