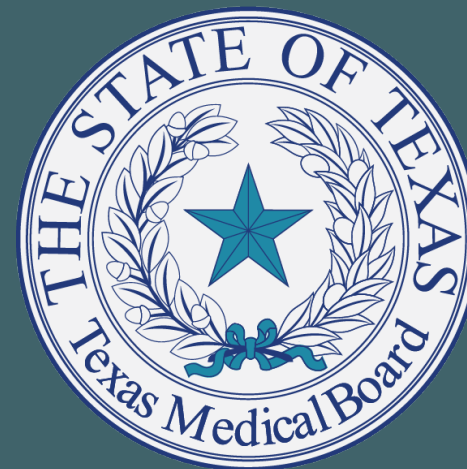


# WHAT TRAINING?

## WHICH EXERCISE?

## HOW TO REPORT THE PLAN AND RESULTS?

ANN BERASLEY



# HEALTHCARE REGULATORY AGENCIES

## FUNCTIONS



### Occupational Licensing

#### *Licensing*

- Issuing new licenses
- Renewing licenses

#### *Enforcement*

- Accepting complaints
- Determining whether violations occurred
- Taking appropriate disciplinary action



## PROFESSIONS

- Physicians
- Physician Assistants
- Acupuncturists
- Medical Radiologic Technologists
- 5 other healthcare providers

- Registered Nurses
- Licensed Vocational Nurses
- Advanced Practice Nurses
- Nursing Education Programs

## STATISTICS

260 FTEs

\$23 million budget

180,000 licensees

142 FTEs

\$15 million budget

480,000 licensees

# State Agency Requirements

## Labor Code

- Requires each agency to develop a plan. (§412.054)
- Directs the SORM to develop guidelines for agency plans. (§412.011; §412.032)

## Policy Letter

- FEMA Guidelines as the standard.
- Designate a continuity planner.
- Administer a continuity awareness & training program.
- Conduct annual exercises.

## Timeline

- Year 1: Continuity Plans
- Year 2: Report on Training and Exercising

# Identifying Topics and Capabilities

# Gathering Information

## Events

- Continuity Events
- Training and Exercising
- Other Entities Tests or Drills
- Process or Procedure Used

## Agency Changes

- Legislative
- Internal Policy
- Organizational
- Key Personnel
- Technology

## FEMA

- Continuity Assessment Tool



National Preparedness

Continuity Resource  
Toolkit

Outreach and Technical  
Assistance

Continuity Policy,  
Doctrine and Guidance

National Continuity  
Training Program

Continuity Templates  
and Resources

Training & Education

National Incident  
Management System  
(NIMS)

National Planning  
Frameworks

National Preparedness  
Goal

Equity

## Outreach and Technical Assistance



English

In coordination with the FEMA regions, FEMA's Office of National Continuity Programs (ONCP) provides outreach and technical assistance to whole community partners across the nation. Outreach and technical assistance offerings are available to non-federal partners, including state, local, tribal and territorial governments; the private sector; non-governmental organizations; and critical infrastructure owners and operators.

## Continuity Assessment Tool

Jurisdictions are encouraged to complete an assessment of current plans and programs using the [Continuity Assessment Tool](#) to identify shortfalls or gaps to guide requests for technical assistance.

## 1

The CAT uses a 10-point scoring system. This progressive scoring system is an integral part of the evaluation and allows an organization to demonstrate progress from one assessment to the next. For each task within each chapter, please select the value on the scale that best represents how much progress your organization has made with regard to the objective or criterion described by the statement. The description of progression for each task is not meant to be prescriptive; an organization should discuss and determine its score against each task using the descriptions as a guide. The summary page will calculate and provide the comprehensive score, as well as a summary score for each

[illegible]

# Continuity Assessment Tool Demo





Table 3: BON's Status on Training Objectives

Initiating		Building		Maintaining	
Training Objectives	Description of Progress	Training Objectives	Description of Progress	Training Objectives	Description of Progress
Have those individuals with continuity roles and responsibilities received continuity training?	<b>Objective Achieved:</b> Individuals with continuity roles and responsibilities, including agency leadership, have received continuity training. The continuity coordinator holds a FEMA Level I Continuity Practitioner certificate.				
		Have all staff members completed continuity awareness training?	<b>Objective Achieved:</b> All staff receive awareness training on the continuity plan and roles, responsibilities, and expectations upon its activation.		
		Has the organization trained continuity personnel on continuity plans and strategies?	<b>Objective Achieved:</b> Primary and alternate continuity personnel, including agency leadership, has received annual training since fiscal 2016.	Has the organization regularly trained continuity personnel on continuity plans and strategies?	<b>Objective Achieved:</b> Primary and alternate continuity personnel, including agency leadership, has received annual training since fiscal 2016.
		Has continuity personnel participated in regular continuity training activities with other continuity programs (both internally and externally)?	<b>Limited Progress:</b> BON is identifying appropriate agencies to participate with since it moved into a new building September 2022.	Have continuity personnel participated in regular continuity training activities with other continuity programs (both internally and externally) on a regular basis?	<b>No Progress:</b> BON has not progressed from the building to maintaining phase on this objective.

Table 5: BONs Status on Exercise Objectives

Initiating		Building		Maintaining	
Exercise Objectives	Description of Progress	Exercise Objectives	Description of Progress	Exercise Objectives	Description of Progress
Has the organization identified and incorporated the results from previous exercises and real-world events to guide the development of the continuity program?	<b>Objective Achieved:</b> BON uses results from all previous exercises and real-world events to guide current planning efforts.				
		Has the organization conducted testing of alert and notification procedures?	<b>Objective Achieved:</b> BON tests alert and notification procedures and implemented improvement action planning. <i>Dial My Calls</i> has been implemented.	Has the organization conducted regular testing of alert and notification procedures?	<b>Objective Achieved:</b> BON conducts stand-alone testing of alert and notification procedures. Testing or actual notifications occurred at least annually over a multi-year period.
		Has the organization conducted testing of activation procedures?	<b>Moderate Progress:</b> BON activated its continuity plan in response to the COVID-19 pandemic.	Has the organization conducted regular testing of activation procedures?	<b>Limited Progress.</b> BON has not regularly tested its activation procedures.
		Has the organization conducted testing of accountability procedures?	<b>Moderate Progress:</b> BON tested accountability procedures. BON moved in September 2022. These procedures need to be updated to align with the new location, telework schedule, and other building tenants.	Has the organization conducted regular testing of accountability procedures?	<b>Moderate Progress:</b> BON typically tests accountability procedures annually. No testing has occurred since the move to the new building.

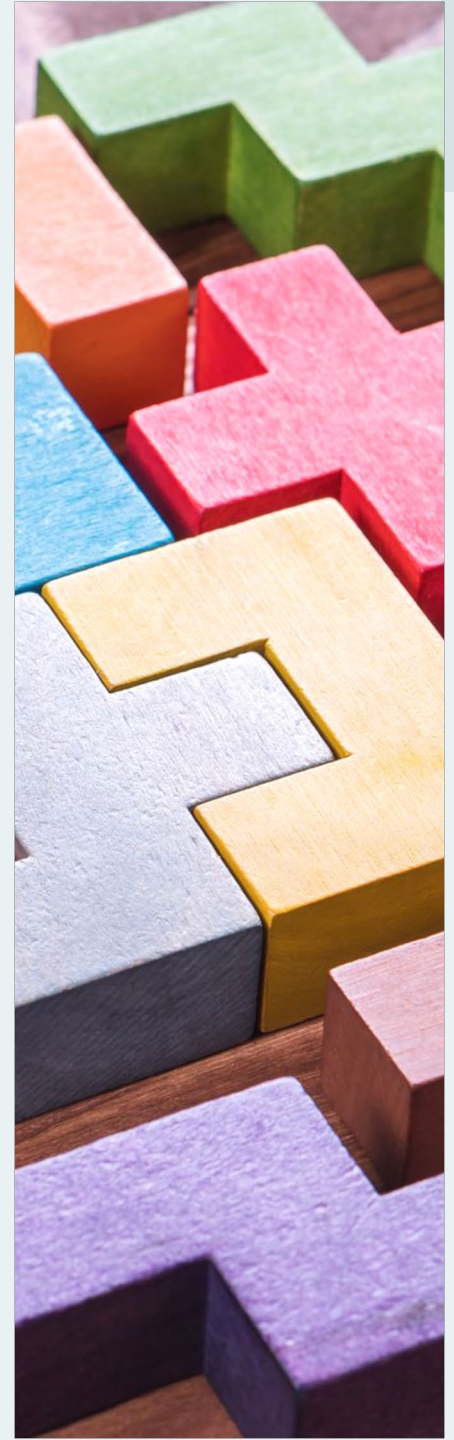
# Selection Process





# Questions To Aid Selection

- Have events identified the need for training?
  - Have any changes to the organization identified needs for training?
  - Did the results of the assessment tool identify training needs?
  - How long has it been since each area was the focus or a component training?
- 
- Have any events identified capabilities that should be exercised?
  - Have any changes to the organization identified capabilities that should be exercised?
  - Did the results of the assessment tool identify capabilities that should be exercised?
  - How long has it been since a capability was the focus or included in an exercise?



# Documenting the Training and Exercise Plan



## Texas Board of Nursing

Training and Exercise Plan – August 2023 (revision)

After-Action Summary Report – October 2023

Texas Board of Nursing  
George H.W. Bush Building  
1801 Congress Ave  
Suite 10-200  
Austin, Texas 78701



### *CONFIDENTIALITY STATEMENT*

This document along with subsidiary plans and supporting documents contain confidential information and are for official use only as provided in Texas Government Code §552.101 and Texas Labor Code §412.054. They are to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with the standard procedures followed for confidential information at the Texas Board of Nursing and are not to be released without prior approval of the executive director to the public or other employees who do not have a valid “need to know.”

## Training Plan for Fiscal 2024

### Awareness Training

Awareness training for all employees provides information on individual preparedness, an overview of continuity planning, what to expect when a continuity event occurs, and their role in supporting the agency's continuity plan and program.

#### TRAINING TOPICS:

- Personal preparedness for employees and their households including links resources for creating personal readiness plans.
- Overview of continuity of operations planning.
- Procedures used to notify employees of plan activation and expectations of non-continuity employees during continuity operations and reconstitution.
- Roles and responsibilities of non-continuity personnel that support the agency's continuity efforts such as the maintenance of essential records.

#### METHODOLOGY:

- Create and distribute quarterly communication to all employees on various continuity topics. Spreading information out over the year should improve employee awareness compared to once-a-year awareness training. (September/December/March/June)

### Continuity Personnel Training

Training for continuity personnel includes an overview of preparing for continuity operations, understanding their roles and responsibilities, and changes made through the annual review and plan revision process. Appropriately trained continuity personnel are a pre-requisite for conducting testing and exercises.

#### TRAINING TOPICS:

- Overview of the continuity cycle including continuity and reconstitution operations.
- Overview of the essential functions, continuity plan organization, and how to access essential records.
- Procedures used to notify continuity personnel of plan activation and relocation to continuity facilities for telework.
- Orders of succession and delegations of authority.

#### METHODOLOGY:

- January 2023 – The prior year's training quiz pointed out areas for improvement, primarily the lack of clarity of their individual roles and responsibilities. The training will be combined with the exercise of reviewing the businesses process analysis, clarifying roles and responsibilities.
- August 2023 Revision – The executive director and director of operations, who have held leadership positions for an extended period, are retiring in August and September, respectively. The executive director was hired within the organization and the director of operations was hired externally. Given these and other changes in agency leadership, the continuity personnel training will focus on upper-level management and key employees responsible for essential functions.

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- Orders of succession and delegations of authority.

#### METHODOLOGY:

- January 2023 – The prior year's training quiz pointed out areas for improvement, primarily the lack of clarity of their individual roles and responsibilities. The training will be combined with the exercise of reviewing the businesses process analysis, clarifying roles and responsibilities.
- August 2023 Revision – The executive director and director of operations, who have held leadership positions for an extended period, are retiring in August and September, respectively. The executive director was hired within the organization and the director of operations was hired externally. Given these and other changes in agency leadership, the continuity personnel training will focus on upper-level management and key employees responsible for essential functions.



## Exercise Plan for Fiscal 2024

*Exercising*

Exercising includes both exercises and testing. Exercises help validate current plans and practices as well as identify areas for improvement. Testing events demonstrate the correct operation of all equipment, procedures, processes, and systems that support an organization's continuity program.

Each year BON reviews the exercises it has conducted in the past, events over the last year that may be used in lieu of an exercise or could be incorporated into an exercise, and changes in continuity personnel that may warrant focusing the exercise on a particular area. BON also reviews the *Continuity Assessment Tool* to assess its progress in the content, scope, and complexity of its exercises.

- January 2023 – The prior year's training quiz pointed out areas for improvement in addition to some previously identified weaknesses, BON planned for a test and a workshop. The test would validate the currency of employees and employees' emergency contact information in CAPPS, the system from which data for the mass notification system is drawn. The exercise would work through the business process analysis for several essential functions, with a focus on clarifying roles and responsibilities.
- August 2023 Revision - The executive director and director of operations, who have held leadership positions for an extended period, are retiring in August and September, respectively. Given these and other changes in agency leadership, the exercise will be two mini exercises focusing on validating essential functions and confirming the orders of successions.

*Mini Exercise 1: Essential Functions*

About nine years ago, BON first identified their essential functions. Since then, BON has updated them when a particular function changed, but has not reviewed them altogether. The change in agency leadership provided an opportunity to get different perspectives on the essential functions.

**PURPOSE AND METHODOLOGY:**

- The exercise will assess the agency's essential function to confirm they are accurately identified and described.
  - Task 1 – Determine if the essential functions are accurately identified.
  - Task 2 – Determine if the essential functions are accurately described.

*Mini Exercise 2: Orders of Succession*

Orders of succession should be based on positions in the agency and not the people who fill those positions. However, with a change in agency leadership the positions needing successors may have changed and the roles and responsibilities of agency leaders may have changed. Reviewing which positions need successors and who those successors are allows the agency to confirm that it will not have a gap in the agency's essential decision-making authority.

**PURPOSE AND METHODOLOGY:**

- This exercise will assess the agency's orders of succession to confirm that they are in place for the appropriate leadership positions and have appropriate successors.
  - Task 1 – Determine if the leadership positions needing successors have been appropriately identified.
  - Task 2 – Determine if the leadership positions have appropriate successors.

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  - Task 1 – Determine if the essential functions are accurately identified.
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# Design and Conduct the Training and Exercise

# The After-Action Report



## Texas Board of Nursing

Training and Exercise Plan – August 2023 (revision)

After-Action Summary Report – October 2023

Texas Board of Nursing  
George H.W. Bush Building  
1801 Congress Ave  
Suite 10-200  
Austin, Texas 78701



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**AFTER-ACTION SUMMARY REPORT**

The Texas Board of Nursing (BON) administers a corrective action program to ensure that its testing, training, and exercising efforts result in improvements to its continuity plan and/or supporting documents, processes, and procedures. The After-Action Summary Report (AASR) pulls together key issues identified during training, testing, and exercising and the solutions for mitigating or eliminating these issues.

**Training Results 2024****Awareness Training**

The continuity coordinator prepared and submitted articles quarterly that were distributed to all employees on various preparedness and continuity topics. This approach reminds employees about preparedness and continuity on a regular basis throughout the year. Topics included:

- Emergency Communication Plans (December 2022)
- Looking Back and Looking Forward - Emergency Preparedness (March 2022)
- Continuity Planning is Organizational Preparedness (June 2023)
- Disruptions that Prompt Continuity Operations (September 2023)

**AREAS FOR IMPROVEMENT**

- N/A

**CORRECTIVE ACTION AND STATUS**

- N/A

**Continuity Personnel Training**

In August 2023 the plan for training continuity personnel was revised. Agency leadership and key employees responsible for essential functions received training that covered:

- A continuity overview covering the continuity cycle, Texas Labor Code and Texas Continuity Policy Letter, continuity plan versus continuity program, continuity planning and reporting cycle, and integrated planning.
- Essential functions including their definition, considerations when identifying essential functions, and BON's current essential functions.
- Orders of succession including their definition, considerations when identifying successors, the difference between successors and alternates, and BON's current orders of succession.

**AREAS FOR IMPROVEMENT**

- N/A

**CORRECTIVE ACTION AND STATUS**

- N/A

**Training Results 2024****Awareness Training**

The continuity coordinator prepared and submitted articles quarterly that were distributed to all employees on various preparedness and continuity topics. This approach reminds employees about preparedness and continuity on a regular basis throughout the year. Topics included:

- Emergency Communication Plans (December 2022)
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- Continuity Planning is Organizational Preparedness (June 2023)
- Disruptions that Prompt Continuity Operations (September 2023)

**AREAS FOR IMPROVEMENT**

- N/A

**CORRECTIVE ACTION AND STATUS**

- N/A

## Exercise Results 2024

*Mini Exercise 1: Review of Essential Functions*

- The exercise provided BON leadership the opportunity to review and assess the essential functions that serve as the foundation of the continuity plan.
- The exercise assessed the agency's essential functions to confirm that they are accurately identified and described.
  - Task 1 – Determine if the essential functions are accurately identified.
  - Task 2 – Determine if the essential functions are accurately described.

**AREAS FOR IMPROVEMENT:**

*Task 1:* None. The two mission-essential functions and four essential supporting activities are accurately identified.

*Task 2:* The following changes to the description of the essential functions were identified:

1. MEF 1 – The function is too narrow because different disruptions would result in different modifications to the processes.
2. ESA 3 – A sub-function related to the revenue collection and payments made to the agency should be included.

*Task 3:* Discussion of the essential functions led to identification of content that should be clarified or added to the essential functions or actions the agency needs to take to ensure the essential functions can be performed.

1. ESA 2 –The methodology used for *Dial My Calls* needs to be documented to assist continuity personnel who are not regular users of the system but may need to use it to send notifications during a disruption, continuity operations, or reconstitution.
2. ESA 4 – Workplace safety duties should be added to this function as these duties took more time than expected during the COVID-19 pandemic.

**CORRECTIVE ACTION AND STATUS:**

*All Tasks:* All of the areas of improvement will be addressed in the fiscal 2025 plan update as the continuity planner will need to work with the appropriate agency leadership and continuity personnel implementing these functions to incorporate the changes.

*Mini Exercise 2: Review of Orders of Succession*

- The exercise provided BON leadership the opportunity to review and assess the orders of succession given the changes in agency leadership.
- The exercise assessed the agency's orders of succession to confirm that they are in place for the appropriate leadership positions and have appropriate successors.

**AREAS FOR IMPROVEMENT:**

*Task 1:* None. The two mission-essential functions and four essential supporting activities are accurately identified.

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Questions?

Observations?



Thank  
you

Ann Berasley

512-939-8962

[ann.berasley@tmb.state.tx.us](mailto:ann.berasley@tmb.state.tx.us)