

Business Continuity Plan

March 2020

Introduction

This plan ensures preparedness and provides guidelines for continuity of College business functions during and/or after an emergency, disaster or event that disrupts the operation of the College. The plan focuses on developing preparedness in the event of a pandemic influenza outbreak.

The goal of the plan is to ensure the College retains capacity at the time of an emergency to perform its regulatory function and associated administrative operations, thus continuing to ensure the public receives competent, ethical occupational therapy services.

The key objective is to identify and plan for continuity of essential College functions in the event of a crisis: to mitigate staff absences and maintain core business functions. The business continuity plan remains a work-in-progress.

Essential College Services

Essential services required to maintain core functions of the College are:

- Regulatory services mandated under the Health Professions Act registration of occupational therapists; maintenance of competence; and complaints and discipline processing
- 2. Communications internal and external, including professional practice advice
- 3. Operations management payroll and accounts payable

Regulatory

Registration

Adhering to all legislative requirements, it will be important to maintain and potentially augment the supply of occupational therapist practitioners in the event that current supply decreases and/or need increases, as may be the case in a pandemic.

The primary focus will be the registration of eligible (qualified) occupational therapists in Alberta. Qualified persons will include those who have retired from occupational therapy and have sufficient hours to establish currency; and new graduates currently registered as Provisional Occupational Therapists.

The College is also prepared to register occupational therapists from other provinces, although this number may be small dependent on the magnitude of the public health situation. The established labour mobility process as per the Canadian Free Trade Agreement (CFTA), ACOTRO Labour Mobility Support Agreement (LMSA) and the New West Partnership Trade Agreement (NWPTA) is an expedited process for occupational therapists entering Alberta to practice from elsewhere in Canada.

The existing time to register an eligible applicant within Alberta is less than two days, from application to permit issuance.

Continuing Competence

The Occupational Therapists Profession Regulation and the Health Professions Act set out continuing competence program timelines. In the event of emergency measures, it is expected that consideration would be given to temporarily suspending timelines requirements in the legislation, if directed by the Government of Alberta to do so.

Complaints and Discipline

The Occupational Therapists Profession Regulation and the Health Professions Act set out processes and timelines for dealing with complaints and discipline issues. In the event of emergency measures, it is expected that consideration would be given to suspending the timelines requirements in the legislation for dealing with professional conduct issues, if directed by the Government of Alberta to do so.

Other Considerations:

- Waiving registration fees for re-registering out-of-retirement occupational therapists who register only to provide pandemic service provision, if directed by the Government of Alberta to do so.
- Reviewing options for professional liability insurance coverage for out-ofretirement occupational therapists. The College will seek collaboration with the Society of Alberta Occupational Therapists to explore available insurance options such as prorated fees based on length of service in a year.
- Review the role of the supervisor of re-entry and internationally educated provisional occupational therapists in a pandemic situation.
- Program for resumption of less essential services such as general education sessions.

Communications

The College will ensure appropriate communications and knowledge is disseminated to occupational therapists and their employers. Occupational therapists are advised by email to check for web updates.

The College will communicate by whatever technology is available; in rank order of efficiency: website, broadcast email, email, telephone, postal mail.

Provide Practice Guidance

When responding to an emergency or public health crisis, occupational therapists may find themselves working in roles and in situations that require different or expanded responsibilities. Members may seek advice /guidance from the College.

As a member of a regulated profession, ACOT expects that therapists will work at a level of competence that meets or exceeds the College's practice standards. As required, occupational therapists may also be delegated restricted activities under the HPA.

College staffing resources will be reallocated as necessary to ensure members receive practice advice related to the emergency situation in a timely manner. Common questions or issues will be posted to the College website or broadcast by email.

Seek Additional Occupational Therapist Resources

Qualified persons who have retired from occupational therapy yet have sufficient hours to establish currency are invited to consent to be contacted by employers about returning to practice should their services be required to assist during a pandemic.

Encourage Volunteer Personnel

Individuals educated as occupational therapists who are not eligible to return to the practice of occupational therapy can contribute in a variety of ways to pandemic services through volunteer roles or as unregulated health workers. These persons are encouraged to volunteer as unregulated personnel, potentially working under the supervision of an occupational therapist.

Considerations:

Issue a College statement to regulated members regarding practice related to emergency-specific situations, recognizing that occupational therapists possess an array of skill sets, a number of which can contribute to the execution of local pandemic plans. The role of Occupational Therapists in an emergency situation may include:

- community-based services including home assessments, caregiver education, public education
- facility-based services including occupational therapy services to clients residing in residential facilities, being discharged from health care facilities, critically ill clients with influenza
- technology-based services including telephone education, population monitoring and triage
- leadership activities across all settings and sectors

Operations Management

The College is currently undertaking an internal cross-training initiative for essential services in registration, communication, and financial operations. Established operational policies and procedures are reviewed and revised regularly.

The College has a very robust information technology system in place. There is full remote access capability to registration functions that permit all staff to work off-site. The registration process, including registration communication, is managed electronically from either the ACOT offices or remotely, with off-site back-up database systems. The telephone system also permits full remote functionality and teleconference capability.

The College also has in place a comprehensive asset protection policy, reviewed annually by the College Council. Specific to disaster planning, the policy details protection of data and disaster recovery with off-site back-up in the computing cloud in Canada; building security; protection of operating capital and maintenance of reserve funds. If a pandemic outbreak hit during the period of registration renewal, which is the time of main revenue intake for the College, reserve funds are available to cover College expenses for a minimum of 1 year.

Acknowledgement

We acknowledge and appreciate Alberta Health Services and fellow member organizations in the Alberta Federation of Regulated Health Professions (AFRHP) and the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) for sharing their contingency planning discussions with ACOT.