The Case for CEAS: Solving the Dilemma of Post-Disaster Access Control

One of the quintessential issues that rises to the surface after every significant disaster is that of post-event access. How do we overcome the obstacles of getting critical, private sector people into an area that has been evacuated and cordoned off to the general public? How can we get needed supplies and service providers to the affected area? How can it be done in an orderly, safe, secure, and rapid way? These questions have vexed emergency managers for quite some time. Failing to succeed in this endeavor risks severe, long-term damage to critical infrastructure, the local economy, and the workforce.

Restoring communities to pre-disaster levels is a task that can often take years. Restoring the businesses that are mostly responsible for the resiliency of the community infrastructure, economy, and workforce is key to a successful and rapid recovery. The creation of partnerships between the public and the private sectors expressly for emergency preparedness and recovery can be the centerpiece of resolving this dilemma. Partnerships can take many forms, but the development of a post-emergency, access-control program for the private sector is a worthy endeavor and one that has been on the collective minds of emergency managers for some time.

The nonprofit Business Network of Emergency Resources (BNET) in 1999 released the final report of a study, funded by FEMA, to determine what the most significant impediments to business recovery were following a disaster. The study, conducted in five regions across New York State and New York City, is known as the *Joint Loss Reduction Partnership (JLRP)*. The overwhelming result of the study proved that "access to the workplace" was the number one impediment to business recovery. Though the methods of business continuity have changed over the past twenty years, the study's results are still relevant today. The study concluded that business recovery and overall community recovery are closely tied.

As a result of the *JLRP*, BNET set out to act on the recommendations of the study and create the first community, post-disaster, access-control system, known today as the **Corporate Emergency Access System (CEAS)**. From its modest beginnings in the city of Buffalo, New York, CEAS is now the access-control solution used in two US states (Massachusetts and Rhode Island) and other major US economic centers like New York City, Philadelphia, and Baltimore. The success of CEAS can be attributed in part to the increased awareness at the local level of the vitally important role the private sector plays in disaster response and recovery. CEAS is a true public-private partnership in the sense that there is tangible value for both sides of the partnership equation.

If you are fortunate enough to do business in a CEAS community, you may have been made aware of its existence at a meeting, conference, or seminar. You may have asked, is CEAS right for my organization? How can I justify the need to participate in CEAS to my company executives? If I do participate, how can I determine which employees in my company should be CEAS cardholders? It is these common questions that this document will try to answer.

If CEAS has not yet come to your community, now might be the time to discuss it with a local business group or trade organization or take the idea to your public officials, who are well aware of the challenges they will face in a post-disaster world but may not be aware of the CEAS program as a solution.

> **There are two challenges frequently faced by organizations considering the CEAS program. The first is determining if CEAS is right for the organization. If CEAS is a good fit, the second and most challenging decision is who within the organization should have a CEAS card, and what is the most effective use of the company's allotment of cards? The goal of this document is to provide general guidance that will help you make these important decisions.**

Does My Company Need CEAS?

It is helpful to clearly define the purpose of the CEAS program to determine if your organization will benefit from participation in CEAS. The CEAS program is an access-control system used only in situations where government officials, as a result of a disaster or severe emergency, have instituted travel restrictions or created a restricted zone or evacuation area to protect a disaster site or provide an exclusionary zone for emergency public safety operations. The system provides for the limited distribution of CEAS access credentials to area businesses on a **pre-enrollment** basis, meaning you must enroll in the CEAS program and have your cards before a disaster occurs. When activated by the local authority, the CEAS program allows the cardholders to travel during travel restrictions or enter restricted areas to enter their business facilities.

CEAS is not intended for business owners to conduct business as usual but to enable business continuity by maintaining core business functionalities; gaining access to vital records, equipment, and information; or by beginning damage assessment and restoration activities so that once restrictions are lifted, the business can resume normal operations. If your company can survive an extended business interruption, CEAS may not make sense for you. You must evaluate the ramifications of not being able to physically access your facilities for an extended time and the extent of financial and reputational damage your business can withstand. Consider, for instance, the impact on your clients, supply chain, and business reputation if you were unable to operate, but your competitors could. If the impact is medium to high, CEAS is an affordable tool to mitigate these risks.

If CEAS Makes Sense for My Company, Which Employees Should Have a CEAS Card?

No two companies are alike; no two industries are alike; and, therefore, it would be impractical to provide a cookie-cutter approach for all businesses to follow when it comes to deciding what personnel should receive CEAS cards. Instead, each company that elects to participate in CEAS should conduct an internal assessment to help make these determinations. Many larger companies have extensive business continuity plans that help define who or what job titles are critical to business recovery. Not all companies have the financial wherewithal or personnel to devote to business continuity planning;

therefore, conduct an internal self-assessment before determining who should be a CEAS cardholder in your company.

There are several free business continuity planning toolkits online from reputable sources—like the American Red Cross, FEMA, and the Insurance Institute for Business & Home Safety—to assist you in making self-assessments. Most of these toolkits are designed for small to medium businesses and guide users through the process of creating a simple business continuity plan and help to establish priorities in making critical decisions. If your company has not planned for business continuity in the past, these toolkits will get you on the right path.

Using CEAS in the Context of My Business Continuity Plan

Risk Assessment/Hazard Analysis

At the highest level, the business continuity planning process evaluates hazards and risks to the business and assesses the impact of those risks to the company. Hazards can run the gamut from fire to hurricanes, and your exposure will depend on your business type and location. For CEAS, it is most important to focus on only those hazards that can result in restrictions on travel or physical access to your facilities.

> *For example, a recall of your product due to tampering may be a real and severe risk to the business; however, it will not cause access problems.*

Once you've identified the risks, the impact of each must be quantified. Does the potential exist for an area evacuation or the imposition of a travel ban or access restrictions? Again, the primary concerns as it relates to CEAS are those events where the potential for travel or access restrictions exist. Finally, the risks and impacts should be ranked based on their adverse potential on the business.

Defining My Critical Business Processes

Once you have considered the risks and the impacts, you should begin to identify the actual business processes that are critical to its viability. These critical business processes are those functions that your company or an outside contractor engages in that are necessary to deliver your product or service. These processes, if not returned to operation within a reasonable or specified amount of time, present a real and tangible risk that your business will suffer extreme losses or be irreparably damaged.

The recovery time objective, RTO, is the time that you must restore your business processes to avoid severe impact. A business continuity or recovery plan will describe means and methodologies to protect these critical business processes. If a hazard should affect the company, the business continuity plan will also outline specific contingencies to keep those functions operating or to restore them within a predefined recovery window. Once you have identified these critical business processes, they too should be ranked in priority of importance.

These assessments and plans can be simple or complex, depending on the size and type of business you are in, but **are vital components when it comes to determining who in your organization should have a**

CEAS card. When making these determinations, it is crucial to keep in mind that critical business processes require people to make them happen; even if that process is entirely automated, there is usually an IT or mechanical professional behind its functionality. In most cases, it is the person behind these processes that will be on your list of cardholders.

It All Comes Down to People

The last piece of the puzzle is to identify the people who are critical to the restoration of the above-described business processes. CEAS gives your company the ability to enable the essential employee who is behind a critical business process to perform his or her job during an emergency or disaster to help maintain the viability of the company. Keep in mind that you may **not** be able to staff the entire function due to the limitations on the number of CEAS cards available to you, so you must be selective regarding who and how many individuals will receive cards. Make your personnel selections based on the priority of importance placed on the business process. Finally, carefully consider your personnel; you will want your most reliable, dependable employees, those whom you can count on in a crisis.

No Business Continuity Plan, No Problem

Not every company has a well-developed business continuity plan in place to help determine employee criticality, but most business owners have an innate sense of who is essential to their business. Intuition is one way of assigning CEAS cards, but not the most reliable. The last thing you want during a crisis is to realize that your intuition was wrong. By merely going through some basic steps and self-assessments outlined above, your critical business functions and personnel will begin to stand out.

The Flex Card Option

It is possible that during a crisis event, people who you didn't previously consider critical become just that. Or an essential role in your organization has a high turnover rate. To accommodate these uncertainties, BNET has developed the Flex Card. The Flex Card is assigned to the company, as opposed to being assigned to an individual. The card has no name or image, only the company name, and allows an organization to issue a card in a just-in-time fashion to employees of this nature. Many companies keep a limited quantity of Flex Cards on hand for this eventuality.

General Rules of Thumb

There are as many commonalities as there are differences regarding the assignment of CEAS cards. Selecting qualified staff to address critical business processes is essential to a successful recovery. A job title that is critical to a brokerage firm may not even exist in a manufacturing firm. There are, however, some general functions that are essential to most businesses not viewed as being related to the delivery of a product or service but are indirectly responsible for your ability to deliver them.

> *For example, if you operate within a large commercial building, there are basic elements that will always be essential to recovery, such as electricity, heat, and water. While your facility HVAC*

may not be directly associated with production or service delivery, without it, you may not be able to occupy your facility.

In most instances, facilities personnel will be part of your company's contingent of cardholders. Getting your facility in condition to operate is typically an essential business recovery operation.

With the increase in telecommuting, many employees can perform their roles remotely from the safety of their homes. But others will require "boots on the ground," again a key component in your CEAS cardholder selection process. Some of the most common functions that organizations include in their CEAS card assignments are discussed below.

- **Facilities**: To bring your facility back up and running, these employees will be critical. Facilities employees will be responsible for assessing and addressing damage to building infrastructure. Often, government agencies will not allow reoccupy of a structure until you have mitigated specific issues. Therefore, as a rule of thumb, those responsible for your physical building should be considered in your CEAS card allotments.
    - o Note: If you do not own and operate your facility, it will be incumbent of you to ensure that your property manager is aware of the CEAS program and has sufficient plans for building access during an emergency.
- **Security**: Many companies staff or contract security services. Security is often a corporate first responder during an emergency. If securing your assets is a priority for your company, you may want to consider assigning CEAS cards to these staff or have your security contractor enroll in CEAS.
- **Information Technology**: Today, almost every business relies in some way on information technology. It is often the backbone that supports your company. With the advent of cloud, computing, and virtual networks, it has become less necessary for IT personnel to be on-site. However, if your company houses and operates IT infrastructure or needs to bring up an alternate worksite location, your IT people will be vital in restoring your technology infrastructure.
- **Essential Service Providers**: Companies have increasingly outsourced business functions over the years, many of which can be considered critical. If your business cannot function or recover without these service providers, they must be considered in your CEAS card assignments. Alternatively, you can make your contractors aware of CEAS and encourage them to enroll. As part of due diligence, many companies require contractors to provide business continuity plans. You may want to consider building CEAS participation into their contracts as a requirement for obtaining or maintaining the agreement.

    In the scenario outlined above, CEAS allows participants to either enroll their essential service providers under their enrollment or the contractors' enrollment. As a rule of thumb, if your service provider assigns the same individuals to you daily, it may make more sense to include that personnel under your employee allotments. If you see someone different every day, it may make more sense for your contractor to enroll in CEAS and assign cards internally to ensure they

will be able to provide services to you. If you require guidance, speak to a CEAS support specialist to find out what works best for your company.

Summary

Whether or not your company should participate in CEAS will include many factors, the most important of which is how tolerant your company is to business interruption. If, like many businesses that participate in CEAS, you've determined that the rewards outweigh the risks of nonparticipation, you will need to take a systematic approach to assess your business and identify the key personnel you would like to be CEAS cardholders.

Your business continuity plan or self-assessment should define the physical risks your company faces, the impact of those risks, and the prioritization of what risks are most likely to result in an evacuation, travel bans, or area access restrictions. Conduct a review of the critical business processes necessary for your company to deliver its product or service. A list of the staff required to make those processes function or return to its normal state in a timely fashion is essential. These employees are your most likely candidates to receive a CEAS card.

Finally, do not forget to look at those daily routine functions performed in your company or by an outside contractor that can adversely hurt your recovery efforts if not maintained. Some common duties include facility operations, security protection, IT, and essential services provided by outside contractors.

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