

104 – CONTINUITY OF OPERATIONS AND RECOVERY PLAN

EFFECTIVE DATES: 10/01/04, 10/01/12, 06/01/14, 07/01/16, 04/01/17, 10/01/17, 10/01/18

REVISION DATES: 01/01/11, 09/27/12, 05/29/14, 02/04/16, 11/01/16, 03/30/17, 05/30/18

I. PURPOSE

This Policy applies to AHCCCS Complete Care (ACC), ALTCS/EPD, DCS/CMDP (CMDP), DES/DDD (DDD), and RBHA Contractors. AHCCCS requires in contract that each of its Contractors have a Continuity of Operations and Recovery Plan to ensure the restoration of business operations following unexpected events, or the threat of such events, which impact the Contractor's ability to adequately serve members. The purpose of this Policy is to outline the required components of the Continuity of Operations and Recovery Plan. Refer to the Resources section of this Policy for additional information in developing an emergency management plan.

II. DEFINITION

ADMINISTRATIVE SERVICES SUBCONTRACTS

An agreement that delegates any of the requirements of the contract with AHCCCS, including, but not limited to the following:

1. Claims processing, including pharmacy claims.
2. Credentialing, including those for only primary source verification (i.e. Credential Verification Organization).
3. Management Service Agreements.
4. Service Level Agreements with any Division or Subsidiary of a corporate parent owner.
5. DDD acute care subcontractors.

Providers are not Administrative Services Subcontractors.

CONTINUITY OF OPERATIONS PROGRAMS (COOP)

An effort within the individual executive departments and agencies to ensure that essential functions continue to be performed during a wide range of emergencies.

III. POLICY

AHCCCS is mandated to provide health care benefits to its members. In order to provide benefits, the Contractor must be able to recover from any disruption in business operations as quickly as possible. This recovery can be accomplished by the development and implementation of a Continuity of Operations and Recovery Plan that contains strategies for recovery. The Continuity of Operations and Recovery Plan is part of the Federal Government's Continuity of Operations Programs (COOP) requirements.

A. CONTRACTOR RESPONSIBILITIES

The Contractor shall develop and maintain a Continuity of Operations and Recovery Plan which assures AHCCCS that the provision of covered services will occur as stated in Contract [42 CFR 438.207 and 42 CFR 438.208]. A comprehensive summary of the Contractor's Continuity of Operations and Recovery Plan shall be evaluated, updated and submitted with Attachment A, as specified in Contract. The summary shall be no longer than five pages and shall address all Continuity of Operations and Recovery Plan requirements outlined below.

B. CONTINUITY OF OPERATIONS AND RECOVERY PLAN REQUIREMENTS

1. The Continuity of Operations and Recovery Plan (Plan) shall be reviewed and tested by the Contractor at least annually, to manage unexpected events and the threat of such occurrences, which may negatively and significantly impact business operations and the ability to deliver services to members. Revisions to the Plan shall be updated as needed by the Contractor.
2. The Contractor shall ensure that all staff are trained and familiar with the Plan at least annually, and understand their respective roles.
3. The Plan shall be specific to the Contractor's operations in Arizona and reference local resources. Generic Plans which do not reference operations in Arizona and the Contractor's relationship to AHCCCS are not acceptable.
4. The Plan shall contain a listing of key customer priorities and key factors that could cause disruption and timelines for when Contractors will be able to resume critical customer services when a disruption occurs.

These priorities include but are not limited to: provider and member communications systems (including telephone, Website and email), providers' receipt of prior authorization approvals and denials, members receiving transportation, and timely claims payments.

The Contractor shall also include any additional priorities as identified by the Contractor to be critical key priorities or factors.

5. The Plan shall contain specific timelines for resumption of services as well as the percentage of recovery at certain hours, and the key actions required meeting those timelines.

Example: Telephone service restored to prior authorization unit within four hours, to Member Services within 24 hours, to all phones in 24 hours.

6. The Plan shall contain, at a minimum, planning and training for:
 - a. Electronic/telephonic failure,
 - b. Complete loss of use of the main site location and any satellite offices in and out of State,
 - c. Loss of primary computer system/records,
 - d. Extreme weather conditions,
 - e. How the Contractor will communicate with AHCCCS during a business disruption. (*The name and phone number of a specific contact in the Division of Health Care Management is preferred*). The Plan shall direct the Contractor staff to contact AHCCCS Security at 602-417-4888 in the event of a disruption outside of normal business hours, and
 - f. Periodic testing and training, at least annually. Training and test results shall be documented.

7. The Contractor shall designate a staff person as Continuity of Operations and Recovery Coordinator and furnish AHCCCS with contact information as part of the Plan.

8. The Contractor shall require Administrative Services Subcontractors to develop and maintain a Continuity of Operations and Recovery Plan.

IV. RESOURCES

The Federal Emergency Management Agency (FEMA) has a website (fema.gov) which contains additional information on Continuity of Operations Planning, including checklists for reviewing a Plan. AHCCCS encourages the Contractor to use relevant parts of these checklists in the evaluation and testing of its Continuity of Operations Plan. The Contractor can also reference the Arizona Department of Emergency and Military Affairs (dema.gov) and the Ready (ready.gov) websites for supplementary information.