

104 CONTINUITY OF OPERATIONS AND RECOVERY/EMERGENCY PREPAREDNESS PLAN

EFFECTIVE DATE: April 2, 2018

REFERENCES: 42 CFR 483.475, 28 CFR 0.85, 22 U.S.C 38 § 2656f (d)(2), ACOM 104, uslegal.com, fema.gov, dema.az.gov, cms.gov, and ready.gov

This policy outlines the Continuity of Operations and Recovery Plan, for the Division of Developmental Disabilities (DDD), including the Continuity of Operations and Recovery Plan/Emergency Preparedness Plan for the Division's Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID), in conformance with CMS Final Rule 42 CFR 483.475, "Medicare and Medicaid Programs, Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers;" and in conformance with ACOM 104.

The Division must be able to recover from any disruption in business operations as quickly as possible. This recovery can be accomplished by the activation 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 and the AHCCCS Contractor Operations Manual.

Division Responsibilities

The Division's Continuity of Operations and Recovery Plan assures AHCCCS that the provision of covered services will occur as stated in its contract [42 CFR 438.207 and 42 CFR 438.208]; and as stated in the CMS Emergency Preparedness requirements [42 CFR 483.475] for ICFs/IID. This policy outlines the policy and procedures requirement for 42 CFR 483.475 in conjunction with ACOM 104.

42 CFR 483.475 requires the following four elements in the ICF/IID Continuity of Operations and Recovery/Emergency Preparedness Plan.

- Risk Assessment and Planning – identifying potential risks to the entity using an "all hazards" approach
- Policies and Procedures – reflective of the risk assessment and to include training and testing procedures
- Communication Plan – communication within the entity and across local community health care providers, in conjunction with state and local public health departments
- Training and Testing – to be conducted annually for all staff

Continuity of Operations and Recovery Plan

A The Division:

1. Reviews, tests, and updates the plan 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
2. Ensures that all staff are trained at least annually and are familiar with the Plan and understand their respective roles



3. Designates a Continuity of Operations and Recovery Coordinator and furnishes AHCCCS with contact information as part of the Plan
4. Requires ICFs/IID to develop and maintain an Emergency Preparedness/Continuity of Operations and Recovery Plan
5. Maintains policies and procedures, as required by the Centers for Medicare and Medicaid Services (CMS), that address:
 - a. The provision of subsistence needs for staff and members (food, water, medical and pharmaceutical supplies)
 - b. Temperatures to protect client health and safety; emergency lighting; fire detection/extinguishing/alarms
 - c. Sewage and waste disposal
 - d. Tracking of members and staff during an emergency
 - e. Evacuation and sheltering in place
 - f. Availability of medical documentation
 - g. The use of volunteers in an emergency
 - h. Arrangements with other ICFs/IID and providers to receive members
 - i. Other mitigation and response strategies as applicable

B. The Plan:

1. References local resources
2. Identifies:
 - a. Key member priorities
 - b. Key factors that could cause disruption
 - c. Any additional priorities identified as critical, including communication systems (e.g., telephone, website, and email), providers' receipt of prior authorization approvals and denials, members receiving transportation, and timely claims payments
3. Contains:
 - a. Specific timelines for resumption of services as well as the percentage of recovery at certain hours, and the key actions required meeting those timelines
 - b. Planning and training for:
 - i. Electronic/telephonic failure



- ii. Complete loss of use of the main site location and any satellite offices in and out of state
 - iii. Loss of primary computer system/records
 - iv. Extreme weather conditions
 - v. Communication during a business disruption. (The name and phone number of a specific contact in the Division of Health Care Management, and AHCCCS Security at 602-417-4888 if disruption occurs outside of normal business hours.)
 - vi. Other mitigation and response strategies as applicable
- c. Documented periodic testing and training at least annually

Resources

For more information on Continuity of Operations Planning and Emergency Preparedness, visit the websites of the following organizations:

- Federal Emergency Management Agency (FEMA) – fema.gov
- Arizona Department of Emergency and Military Affairs – dema.az.gov
- Centers for Medicare and Medicaid Services (CMS) – cms.gov
- Ready.gov.