

104 CONTINUITY OF OPERATIONS AND RECOVERY PLAN

EFFECTIVE DATE: October 1, 2019

REFERENCES: 42 CFR 438.207 and 42 CFR 438.208; Business Continuity and Recovery Plan Checklist (ACOM 104-Attachment A); Contract Section F, Deliverables

DELIVERABLES: Continuity of Operations and Recovery Plan Summary

This policy applies to the Division's Administrative Services Subcontractors (AdSS). The Division requires in the contract that each of its AdSS have a Continuity of Operations and Recovery Plan to ensure restoration of business operations following unexpected events, or the threat of such events, which impact their ability to adequately serve members. The purpose of this policy is to outline the required components of the Continuity and Recovery Plan. Refer to the Resources section of this policy for more information in developing an emergency management plan.

Definitions

A. 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
3. Management Service Agreements
4. Service Level Agreements with any division or subsidiary of a corporate parent owner.

Providers are not AdSS.

B. 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.

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

AdSS Responsibilities

The AdSS must develop, maintain, and update annually a Continuity and Recovery Plan that assures the Division that the provision of covered services will occur as stated in the contract (42 CFR 438.207 and 42 CFR 438.208). As specified in contract Section F, Deliverables, a comprehensive summary of the AdSS's Continuity and Recovery Plan must be evaluated, updated, and submitted with a Continuity and Recovery Plan Checklist (AHCCCS Contractor Operations Manual Policy 104-Attachment A). The summary must be no longer than five pages and must address all Continuity and Recovery Plan requirements outlined below.

Continuity and Recovery Plan Requirements

- A. The Continuity and Recovery Plan (Plan) must be reviewed and tested at least annually to manage unexpected events that may negatively and significantly impact the ability to deliver services to members and must be updated as needed by the AdSS.
- B. The AdSS must ensure that all staff are trained and familiar with the Plan, and understand their respective roles.
- C. The Plan must be specific to the AdSS's operations in Arizona and reference local resources. Generic plans that do not reference operations in Arizona and the AdSS's relationship to the Division are not acceptable.
- D. The Plan must contain a listing of key customer priorities and key factors that could cause disruption and timelines for when the AdSS will be able to resume critical customer services when a disruption occurs.
- E. These priorities include but are not limited to:
 - 1. Providers receipt of prior authorization approvals and denials
 - 2. Members receiving transportation
 - 3. Timely claims payments.
- F. The AdSS must also include any additional priorities as identified by the AdSS to be critical key priorities or factors.
- G. The Plan must 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.

- H. The Plan must contain, at a minimum, planning and training for:
 - 1. Electronic/telephonic failure
 - 2. Complete loss of use of the main site and any satellite offices in and out of State
 - 3. Loss of primary computer system/records
 - 4. Extreme weather conditions
 - 5. How the AdSS will communicate with the Division during a business disruption (the name and phone number of a specific contact in the Division of Health Care Management is preferred)

The Plan must direct the AdSS staff to contact the Division at 602-542-0419 in the event of a disruption outside of normal business hours.

6. Periodic testing, at least annually. Results of the test must be documented.
 - I. The AdSS must designate a staff person as Continuity Planning Coordinator and furnish the Division with contact information as part of the Plan.
 - J. The AdSS must require its subcontractors to develop and maintain a Continuity and Recovery Plan.

Resources

The Federal Emergency Management Agency (FEMA) website contains more information on continuity planning, including checklists for reviewing a Plan. The Division encourages the AdSS to use relevant parts of these checklists in the evaluation and testing of its own

Continuity Plan. The AdSS can also reference the Ready.gov website for supplementary information.