POLICY AND PROCEDURE

DEPARTMENT:	DOCUMENT NAME: Continuity of Operations
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APPROVED DATE: 10/20/22	**RETIRED:**
EFFECTIVE DATE: 1/1/23	**REVIEWED DATE:**
PRODUCT TYPE: Medicaid	**REFERENCE NUMBER:** LA.OPS.06

SCOPE:
Centene Corporate and Health Plan Member Services.

PURPOSE:
To provide a singular policy that governs how the business continuity plan is implemented.

POLICY:
The Contractor shall maintain a Continuity of Operations Plan (aka Business Continuity Plan) that addresses how the Contractor's, Material Subcontractors', and other subcontractors' operations and the ongoing provision of healthcare services shall be maintained in the event of a pandemic, natural disaster or man-made emergency including, but not limited to, localized acts of nature, accidents, and technological and/or attack-related emergencies, or other event which leads to a significant disruption in operations due to staff absence and/or loss of utilities that impacts fulfilling the requirements of this Contract. The Continuity of Operations Plan shall be invoked no later than when the fulfillment of these requirements is impacted by such an event.

As part of the Continuity of Operations Plan, the Contractor shall provide its action plan for development of an emergency preparedness plan specific to each of its Enrollees with Special Health Care Needs (SHCN) during or following an event as described above. The emergency preparedness plan must be provided to the Enrollee in a manner and format that may be easily understood and is readily accessible. Information in the plan must be communicated in a way that can be understood by Enrollees of varying functional ability and language proficiency. The plan must identify any steps the Enrollee and/or Enrollee's caregiver should take in the event of an emergency including, but not limited to, special considerations regarding medications, supplies and dietary needs, or power outages, as applicable, and corresponding contact information.

The Contractor shall follow all LDH directives regarding access to care and relaxation of authorization requirements during an emergency. Corresponding system edits for all services shall be implementable at the parish level during an emergency.

- **The Contractor must have a method for ensuring that Prior Authorizations are extended and transferred to new providers during a pandemic, natural disaster, man-made emergency, or other event if directed by LDH.**

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As part of the Continuity of Operations Plan, the Contractor shall provide a systems contingency plan, regardless of its system architecture, to protect the availability, integrity, and security of data and to continue essential application or system functions during and immediately following these events.

- **The systems contingency plan shall include, at a minimum:**
  - **A disaster recovery plan designed to recover systems, networks, workstations, applications, etc. in the event of a disaster; and**
  - **A Business Continuity Plan (BCP) for restoring the operational function of the organization in the event of a disaster and includes items related to IT, as well as operational items such as employee notification processes and the procurement of office supplies needed to do business in the emergency mode operation environment.**

- **The systems contingency plan shall address the following scenarios, at a minimum:**
  - **The central computer installation and resident software are destroyed or damaged;**
  - **The system interruption or failure resulting from network, operating hardware, software, or operations errors that compromise the integrity of transactions that are active in a live system at the time of the outage;**
  - **System interruption or failure resulting from network, operating hardware, software or operations errors that compromise the integrity of data maintained in a live or archival system; and**
  - **System interruption or failure resulting from network, operating hardware, software or operational errors that does not compromise the integrity of transactions or data maintained in a live or archival system, but does prevent access to the System, such as it causes unscheduled System unavailability.**

- **The systems contingency plan shall specify projected recovery times and data loss for mission-critical Systems in the event of a declared disaster.**

- **The Contractor shall annually test its plan through simulated disasters and lower-level failures in order to demonstrate to LDH that it can restore system functions. The Contractor shall report documentation of this testing in a manner determined by LDH.**

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- o **In the event the Contractor fails to demonstrate through these tests that it can restore systems functions, the Contractor shall be required to submit a Corrective Action Plan to LDH describing how the failure shall be resolved within ten (10) Business Days of the conclusion of the test.**

The Contractor shall submit the Continuity of Operations Plan to LDH or its designee for approval as part of Readiness Review and no later than thirty (30) Calendar Days prior to implementation of changes.

PROCEDURE:
In the event that any operations and the ongoing provision of healthcare services are impacted due to a pandemic, natural disaster or man-made emergency as stated above the continuity of operations plan shall be invoked no later than when the fulfillment of these requirements is impacted by such an event.

Prior to such an implementation, the BC Champion along with the BC Liaison Primary shall convene a meeting with the LHCC Leadership Response team to discuss the impact and next steps.
- **The meeting will be scheduled ASAP, but no later than the same day of the event.**
- **If applicable, the BC Champion or designated alternate should call IROC as soon as it is safe to do so to escalate and notify of an impending or in-progress crisis event.**

If it is determined by the LHCC Leadership Response team that the Continuity of Operations plan be invoked, the BC Champion along with the BC Liaison Primary will follow all guidelines as outlined in the Continuity of Operations Plan.

Additionally, LHCC shall immediately inform LDH, in writing, when invoking its Continuity of Operations Plan. If the nature of the triggering event renders written notification impossible, the Contractor shall notify LDH of the invocation of the Continuity of Operations Plan through the best available means. If the nature of triggering event renders immediate notification impossible, the Contractor shall inform LDH of the invocation of the Continuity of Operations Plan as soon as possible.

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REFERENCES: **LHCC Business Continuity Plan**   **LHCC Emergency Management Plan**   **IT Disaster Recovery Plan**

ATTACHMENTS:

DEFINITIONS:

REVISION	**DATE**

POLICY AND PROCEDURE APPROVAL
The electronic approval retained in Archer is considered equivalent to a physical signature.