

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, 07/25/24, [10/01/25¹](#)

APPROVAL DATES: 01/01/11, 09/27/12, 05/29/14, 02/04/16, 11/01/16, 03/30/17, 05/30/18, 05/23/24, [05/01/25²](#)

I. PURPOSE

This Policy applies to ACC, ACC-RBHA, ALTCS/EPD, DCS/~~CHP~~ (CHP), and DES/~~DDD~~ (DDD) Contractors. AHCCCS requires the Contractor to have a Continuity of Operations and Recovery Plan ([CORP³](#)) to ensure the restoration of business operations following unexpected events, or the threat of such events, which may negatively and significantly impact the Contractor's ability to adequately deliver services to members. The purpose of this Policy is to specify the required components of the ~~Continuity of Operations and Recovery Plan~~[CORP](#).

II. DEFINITION

Refer to the [AHCCCS Contract and Policy Dictionary](#) for common terms found in this Policy ~~including:~~

ADMINISTRATIVE SERVICES SUBCONTRACT/ SUBCONTRACTOR	CONTINUITY OF OPERATIONS PROGRAM (COOP)	MEMBER⁴
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III. POLICY

AHCCCS is mandated to provide health care benefits to its members. ~~To provide benefits, the Contractor shall be able to recover from any disruption in business operations as quickly as possible. This recovery can be accomplished through implementation of the Contractor's Continuity of Operations and Recovery Plan (CORP which shall contain strategies for recovery. The Continuity of Operations and Recovery Plan~~[CORP](#) is part of the Federal Government's Continuity of Operations Programs (COOP) requirements.

¹ [Date policy is effective.](#)

² [Date Policy is approved.](#)

³ [Spelled out acronym. Providing identified acronym with changes being made throughout policy.](#)

⁴ [Removed to align with Contract and Policy formatting standards. Common terms can be found in the AHCCCS Contract and Policy Dictionary.](#)

A. CONTRACTOR RESPONSIBILITIES

The Contractor shall develop and maintain a ~~Continuity of Operations and Recovery Plan~~ CORP 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~~ CORP shall be evaluated, tested, and updated annually; this is to manage unexpected events including the threat of such occurrences, which may negatively and significantly impact business operations, and the ability to deliver services to members. Revisions to the CORP shall be updated as needed by the Contractor.⁵ The Contractor's CORP shall be made available to AHCCCS upon request. The Contractor is responsible for ensuring its subcontracted health plan(s) comply with this policy. ~~and submitted with Attachment A, as specified in Contract.~~

The Contractor shall designate ~~a its key staff person as the~~ position, Continuity of Operations and Recovery Coordinator, ~~to be responsible for the coordination and implementation of the Contractor's CORP, training of plan, and testing of plan.~~⁶ ~~and furnish AHCCCS with contact information as part of the Continuity of Operations and Recovery Plan.~~

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

B. CONTINUITY OF OPERATIONS AND RECOVERY PLAN REQUIREMENTS

~~A comprehensive summary of the Contractor's Continuity of Operations and Recovery Plan shall address all requirements outlined below.~~ The Contractor's CORP shall address, at a minimum, the following and shall be no longer than five pages.⁷

- ~~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.~~ Results of the annual tests shall be documented in the CORP including any changes made due to the results of the annual test.⁸
- ~~2. Staff training requirements to ensure all staff understand their respective roles and documentation of staff training occurring at least annually.~~⁹
- ~~2. The Contractor shall ensure that all staff are trained on the Plan at least annually and understand their respective roles.~~
- ~~3. The Plan shall be specific to the Contractor's o~~ 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.

⁵ Moved for flow purposes.

⁶ Revised to align with contract language.

⁷ AHCCCS is no longer requiring the Contractor's to submit this deliverable, removed the 5-page requirement, and revised the lead in sentence.

⁸ Requirement previously listed on Attachment A, moved to policy due to change of attestation.

⁹ Revised to align with the lead in language and removed duplicate language.

- Addresses ~~The Plan shall contain a listing of k~~ key priorities that could cause disruption.
4. Key priorities include but are not limited to:
 - a. Provider and member communications systems (including telephone, website, and email),
 - b. Member Services,
 - c. Scheduling,
 - ~~a~~-d. Clinic and/or Physician Visits,
 - ~~b~~-e. Providers' receipt of prior authorization approvals and denials,
 - f. Members receiving transportation,
 - g. Outpatient or inpatient procedures,
 - ~~c~~-h. Utilization review/Concurrent review,
 - i. Timely claims/provider payments, and
 - j. Grievance and Appeals,
 - ~~d~~-k. Quality of Care Concerns (QOC), and
 - ~~e~~-l. Any additional priorities identified by the Contractor and/or AHCCCS to be critical key priorities. ¹⁰
 5. ~~The Plan shall contain s~~ Specific timelines for resumption of services as well as the percentage of recovery at certain hours, and the key actions required for meeting those timelines.

 Example: Telephone service – 50% functionality recovered within one hour, 75% functionality recovered within two hours, and 100% functionality recovered within three hours.¹¹
~~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, p~~ Planning and training for:
 - a. Electronic/telephonic failure at the Contractor's main place of business and any satellite offices in State and out of State,
 - i. For ACC-RBHAs, the business crisis telephone line or loss of internet connection for providers that deliver crisis services,¹²
 - b. Complete loss of use of the main site location and any¹³ satellite offices in State and out of State,
 - c. Loss of primary computer system/records,
 - d. Extreme weather conditions, and
 - e. How the Contractor will communicate with AHCCCS during a business disruption;
~~(u) Unless otherwise directed, this should be the name and phone number of the Contractor's assigned AHCCCS Operations Compliance Officer.~~ The ~~Plan~~CORP shall direct the Contractor's staff to contact AHCCCS Security at 602-417-4888 in the event of a disruption outside of normal business hours, and.
 - f. Periodic testing at least annually. ¹⁴

¹⁰ Updated to align with deliverable requirement previously listed on Attachment A, moved to policy due to align with attestation. Changes made throughout policy.

¹¹ Revised example to align with the deliverable requirement.

¹² Updated to align with deliverable requirement previously listed on Attachment A, moved to policy due to align with attestation. Changes made throughout policy.

¹³ Revised to identify deliverable requirements.

¹⁴ Revised to specify testing requirement.

7. Emergency plan provisions for facilities and hospitals in the event members are displaced in an emergency.

~~7.8.~~ Contact information for the designed Continuity of Operations and Recovery Coordinator.¹⁵

IV. RESOURCES

The Federal Emergency Management Agency (FEMA) has a website: <https://www.fema.gov/> which contains additional information on Continuity of Operations Planning, including checklists for reviewing a Continuity of Operations Plan. AHCCCS encourages the Contractor to use relevant parts of these checklists in the evaluation and testing of its ~~Continuity of Operations and Recovery Plan~~^{CORP}. The Contractor may also reference the Arizona Department of Emergency and Military Affairs <https://dema.az.gov> and the Ready website <https://www.ready.gov> for supplementary information.

¹⁵ Revised to align with deliverable requirements.