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Document Scope: (applies to Policy & Procedure only)

- The requirements herein apply only to the GCBH BH-ASO Central Office and its functions.
- The requirements herein apply, verbatim, to GCBH BH-ASO, its contractors, and its network providers².
- The requirements herein apply both to GCBH BH-ASO and its network providers². Additionally, network providers must have internal documents outlining their processes for implementing the requirements, insofar as they relate to actions for which network providers are responsible.

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I. Purpose:

The purpose of the Greater Columbia Behavioral Health Administrative Service Organization (GCBH ASO) Business Continuity and Disaster Recovery Plan (BCDRP) is to address how GCBH ASO will mitigate the risk of a possible interruption of necessary operations or restore functionality in the event of an incident or disaster.

II. Assets Covered

- a. List of equipment in use:
 - i. Computers for staff at their desks
 - ii. Laptop computers for staff at their home offices
 - iii. Servers (see Appendix B)
 - iv. Storage array
 - v. Firewalls
 - vi. Switches

¹See definitions of document types in AD100, "Development, Approval & Review of Formal GCBH Documents"

²"Network Provider" – An organization with which GCBH is contracted for the provision of direct services.

- vii. Uninterrupted Power Supplies
 - viii. Wireless Access Point
 - ix. Phones
 - x. Mifis
 - xi. Authorization mobile phone
 - xii. Printers
 - xiii. Copy machine
 - xiv. Fax machine
 - xv. Air conditioning - building
 - xvi. Air conditioning units – server room
- b. List of applications
- i. Microsoft Office (Outlook, Word, Excel, Access, PowerPoint)/Office365
 - ii. Adobe Acrobat Pro
 - iii. Web browsers (Chrome, Edge)
 - iv. SQL Server
 - v. Cisco Anyconnect VPN
 - vi. Zoom
 - vii. Microsoft Teams
 - viii. Webex
 - ix. Remote Desktop Connection
 - x. FileZilla
 - xi. Sophos Antivirus
 - xii. Titan SFTP
 - xiii. Cougar Mountain
 - xiv. Visio
 - xv. Raintree Systems
 - xvi. Notepad++
 - xvii. PDQ Inventory
 - xviii. PDQ Deploy

III. What to do if there is an Incident or Disaster

There can be many different incidents or disasters that could cause an interruption in duties, functions, or services for GCBH ASO. We have identified different types of incidents or disasters that we can prepare for and mitigate the detrimental impact to GCBH ASO operations.

- a. Types of incidents:**
- i. Failure of hardware, server (equipment failure, theft, physical damage)
 - ii. Computer virus
 - iii. Fire/water damage
 - iv. Loss of environmental controls (air conditioning failure)
 - v. Application/software failure
 - vi. Confidentiality or security breach, PHI violation
 - vii. Power failure

viii. Communications failure

b. Types of disasters

- i. Natural disaster (such as wildfire, flood, earthquake, tornado)
- ii. Significant building damage
- iii. Long-term power or energy disruptions
- iv. Long-term communications failure
- v. Long-term hardware failure
- vi. Loss of key personnel
- vii. Leak of protected data/EPHI
- viii. Pandemic

c. Goals from recovering from a disaster

The GCBH ASO goals for when going through an incident or disaster is to mitigate any negative impact to the GCBH ASO or ASO function during the incident/disaster, and to recover as quickly as possible to restore full functionality. All staff have been assigned GCBH laptops to be able to use in their home offices to allow them to securely connect to their GCBH office workstations to work from home as needed. No PHI is stored on these laptops; they are solely for the purpose of establishing a VPN connection and remoting into their GCBH office computer. The home office laptops are brought into the office periodically to be updated and scanned. This has been used extensively during the pandemic shutdown, and subsequent COVID exposures in the office.

i. Core ASO functions

1. *Authorizations*

In the event that GCBH ASO is unable to receive electronic faxes to our authorization fax, we do keep and maintain an analog fax line that can be used to send and receive authorization data with hospitals as needed. Additionally, GCBH ASO keeps and maintains a cell phone that is used for after hours to receive authorization calls that can be used in an emergency as our authorization line if needed. This backup process will implement within 12 hours of the incident/disaster if functionality has not yet been restored.

2. *Processing/submitting data*

Backups occur nightly on weeknights of data and software on all servers via Veeam. Backups are made locally on our network for speed and for ease of restoring data quickly if needed. Also, every evening those local backups are also copied to cloud backup storage to ensure secure offsite. Testing of the backups occur at least annually.

If there is a network outage that impedes providers' ability to send data to GCBH ASO, or for GCBH ASO to submit data to ProviderOne and the MCOs, there is not an easy way around this until the network connectivity is restored. If the network outage is short-term, the best option is to wait for the network connectivity to come back online.

3. *Handling phone calls/inquiries*

GCBH ASO will work to restore regular phone functionality as soon as possible in the event that phone service is interrupted. GCBH ASO does have voicemail that will allow clients and others to leave a message for GCBH ASO staff to respond to as soon as they are able.

d. Initiating the BCDRP

To initiate the BCDRP, an incident or disaster needs to be identified and reported to the appropriate person at GCBH ASO. If a GCBH ASO staff person or contractor realizes there is an incident or disaster that has occurred, that person should go to the *Appendix A: Phone Tree and Resources* to identify the correct person for them to contact to report it. This Appendix includes a “when to call” column to help identify situations of when you would contact the GCBH ASO staff or resource to either initiate the BCDRP or to work on the resolution to the issue.

IV. Communication

a. Notifications

It is very important that when going through an incident or disaster, that the lines of communication stay clear and open as much as possible. As much as you are able, management and staff should be apprised of the progress towards resolving incidents/disasters impeding normal GCBH ASO business. Notifications may include in person or via phone or text if email is not an option.

b. Meetings

Meetings with staff and contractors may be necessary when working to reestablish GCBH ASO operations during an incident or disaster. As much as possible, any meetings that are scheduled or convened should not conflict with making progress on overcoming the disaster/restoring GCBH operations.

c. After Incident: Debriefing, logging

After the disaster is past and GCBH ASO has operations restored, there should be a debrief at GCBH ASO of how things went during the incident in getting services restored. Included in the debrief should be what worked, what did not work, and what could be improved if this happened again. Additionally, any time that the Disaster Recovery Plan is implemented (be it an actual disaster or a testing of the plan) it should be logged. The log should include a summary of what happened, and how things can be improved next time.

V. Loss of Key Personnel

a. Instructions

Job duties for key personnel should be documented and instructions for important GCBH ASO functions shall be written and maintained. Clear written instructions are important to ensuring that GCBH ASO can continue to perform necessary operations in the event that there may be a loss of personnel.

b. Training/Backups

Important GCBH ASO functions should have a primary responsible staff as well as a secondary staff designated who would be able to fill in and cover the duties as needed. These secondary staff should be trained for these duties in case the need arises, and can help test out the completeness of the instructions if needed. Cross-training staff helps to ensure that GCBH ASO can continue normal operations even if there is a loss of key personnel.

c. Contractors

GCBH ASO may also choose to utilize contractors to help cover some of the important functions of the ASO, or have them designated as secondary in the case of the loss of key personnel.

VI. Plan maintenance

a. Review of BCDRP

The GCBH ASO Business Continuity and Disaster Recovery Plan shall be reviewed and annually for changes and approved by the Executive Committee.

b. Training of staff

All GCBH ASO staff shall be trained to be aware of the BCDRP, know where and how to review a copy, and be empowered to implement the Plan in the case of an incident or disaster.


c. Testing of plan

The GCBH ASO BCDRP shall be tested annually and the testing shall be documented and logged.

VII. Appendices

- a. Phone tree/Resources
- b. Server functions
- c. Network Diagram
- d. Logins/Passwords
- e. Checklist
- f. Network Maintenance Checklist
- g. Provider MIS Contacts
- h. Office map with workstations assigned and extensions

APPROVAL



Karen Richardson or Sindi Saunders, Co-Directors



Date