



Emergency Preparedness and Response Plan

Effective January 1, 2025



Introduction

AIDS Healthcare Foundation (AHF) operates PHC California, a Medi-Cal managed care plan in Los Angeles County through its Managed Care Division based in the City of Los Angeles. The Managed Care Division also has staff based in Fort Lauderdale, Florida. AHF prepared this Emergency Preparedness and Response Plan to address plan operations and enrollee communications in the event of a natural or manmade disaster or emergency. This plan is effective January 1, 2025.

This plan includes a business continuity emergency plan and enrollee emergency preparedness plan. The plan includes an appendix that includes relevant plan policies and procedures.



Business Continuity Emergency Plan

AHF developed this business continuity emergency plan to detail actions it will take when a natural disaster, manmade disaster, public health emergency, severe weather, civil unrest/riot, or other event that causes a disruption of operations. AHF defines an emergency as an acute situation that poses an imminent risk of:

- Injury or loss of life to AHF's employees, enrollees and patients, customers or guests.
- Causing significant damage or destruction to AHF facilities or properties.
- Causing significant enterprise-wide business interruption that impacts the accomplishment of AHF's mission.

This business continuity emergency plan addresses:

- Internal staff communications strategy
- Emergency preparedness risk assessment
- Emergency team staffing and responsibilities
- Cooperative agreements
- Training and drills
- System recovery

Communication

AHF is contracted with Everbridge, which is a system that allows key personnel within the organization to send out emergency messages to employees, affiliates and partners advising them of an emergency situation. This emergency communication application is used across the entire company, which includes the Managed Care Division.

Messages out of Everbridge are categorized as follows:

- Natural disaster messages – natural disaster messages are used as a result of a major adverse event resulting from natural processes of the Earth.
- Threat messages - Threat messages are used when a dangerous manmade situation occurs that can result in injury, loss of life or significant property damage.
- General notice messages – General notice messages can be used to address multiple types of situations where there is a need to provide a clear message to AHF employees or partners regarding a situation or the status of operations at an AHF site or event.



- Infrastructure messages – Infrastructure messages can be used to address situations that cause a significant business interruption to one or more key systems, sites or business units.

Each message that goes out through Everbridge has additional information to assist recipients.

- Purpose: Provides the overall reason for sending this message.
- Used For: Provides the general circumstances as to when a specific message should be sent.
- Key Indicators: Provides detailed conditions or factors that may be used to determine if the emergency message should be sent.

Everbridge distributes emergency messages through its smart phone app, text messages and email to ensure staff receive the messages. The system allows for the sender of the emergency message to request a reply. Examples of requested replies include:

- The recipient received the message and understands the instructions
- The recipient received the message and has not been impacted by the emergency and can return to work as scheduled
- The recipient received the message and has been impacted by the emergency and cannot return to work as scheduled.

Another feature of the Everbridge application is that it can target messages geographically, which is a requirement for AHF which has operations around the world.

Emergency Preparedness Risk Assessment

The AHF Emergency Preparedness Risk Assessment is designed to ensure comprehensive preparedness for a wide range of potential emergencies. This plan includes the identification and assessment of various public health crises and natural or man-made emergencies that could impact business operations. These emergencies encompass epidemics, pandemics, earthquakes, fires, floods, storms, hurricanes, tornados, power outages, gas leaks, bomb threats, explosions, hazardous materials incidents, relocations, evacuations, assaults, intrusions, bioterrorism, injuries, riots, and information technology security incidents.

The plan evaluates the likelihood of these emergencies occurring within the AHF's service area and assesses their potential to disrupt business operations. Additionally, it identifies and assesses any essential supply chain impacts that may arise during or after



an emergency. AHF is committed to regularly updating this assessment to reflect any changes, with a minimum update frequency of once per year.

Stakeholder Involvement

The AIDS Healthcare Foundation recognizes the importance of involving key stakeholders in the Risk Assessment process to ensure comprehensive and effective emergency preparedness. The following stakeholders will be actively engaged:

1. Executive Leadership:
 - o Provide strategic direction and oversight for the Risk Assessment and Emergency Plan.
 - o Ensure alignment with organizational goals and regulatory requirements.
2. Compliance and Risk Management Teams:
 - o Lead the identification and assessment of potential risks.
 - o Develop and implement mitigation strategies.
3. Department Heads and Managers:
 - o Contribute insights on specific departmental risks and vulnerabilities.
 - o Assist in the development of department-specific emergency response plans.
4. IT and Security Teams:
 - o Assess and address information technology risks.
 - o Develop protocols for IT security incidents.
5. Supply Chain and Operations Teams:
 - o Identify critical supply chain dependencies and potential disruptions.
 - o Develop contingency plans to maintain operations during emergencies.
6. Human Resources:
 - o Ensure employee safety and well-being during emergencies.
 - o Develop communication plans and training programs for staff.
7. External Partners and Vendors:
 - o Collaborate on risk assessments and emergency response strategies.
 - o Ensure continuity of essential services and supplies.
8. Regulatory and Public Health Authorities:
 - o Maintain compliance with relevant regulations and guidelines.
 - o Coordinate with public health authorities during public health crises.

Regular meetings and communication channels will be established to facilitate ongoing collaboration and updates among stakeholders. This collaborative approach ensures



that the Risk Assessment and Emergency Plan are comprehensive, up-to-date, and effective in mitigating potential risks.

To ensure the Risk Assessment and Emergency Plan are comprehensive and effective, the following methods will be used to gather feedback from stakeholders:

1. Surveys and Questionnaires:
 - o Distribute regular surveys to gather input on potential risks and the effectiveness of current mitigation strategies.
 - o Use questionnaires to collect detailed feedback on specific areas of concern.
2. Focus Groups:
 - o Organize focus groups with representatives from different departments to discuss risk assessment findings and gather diverse perspectives.
 - o Facilitate discussions on potential improvements and new strategies.
3. Workshops and Training Sessions:
 - o Conduct workshops to educate stakeholders on risk assessment processes and gather their input.
 - o Use training sessions to identify gaps in knowledge and areas needing improvement.
4. Regular Meetings:
 - o Schedule regular meetings with key stakeholders to review and update the Risk Assessment and Emergency Plan.
 - o Use these meetings to discuss feedback and incorporate it into the plan.
5. Feedback Forms:
 - o Provide feedback forms for stakeholders to submit their comments and suggestions at any time.
 - o Ensure these forms are easily accessible and reviewed regularly.
6. One-on-One Interviews:
 - o Conduct individual interviews with key stakeholders to gather in-depth feedback and insights.
 - o Use these interviews to address specific concerns and gather detailed information.
7. Anonymous Feedback Channels:
 - o Establish anonymous channels for stakeholders to provide feedback without fear of repercussions.
 - o Encourage honest and open communication through these channels.

Regular meetings and communication channels will be established to facilitate ongoing collaboration and updates among stakeholders. This collaborative approach ensures that the Risk Assessment and Emergency Plan are comprehensive, up-to-date, and effective in mitigating potential risks.

Identification of potential outcomes and assess/score inherent risks

This step involved assessing each identified risk and assigning a risk score for each inherent risk type for the following categories:

- Likelihood: The level of possibility that a risk will occur.
- Severity: The level of possibility that the risk could inflict harm on beneficiaries.
- Overall: The average score of the scores for the preceding risk categories.

Stakeholders are requested to assign a numerical value to each identified based on high to low:

5: Critical: Immediate and severe impact, potentially life-threatening or causing significant damage.

4: High: Serious impact, requiring urgent attention and mitigation.

3: Medium: Moderate impact, manageable with proper precautions and monitoring.

2: Low: Minor impact, unlikely to cause significant issues but still worth noting.

1: Insignificant: Minimal impact, very low likelihood of causing any problems.

Mitigation Strategies

A mitigation strategy is a proactive approach designed to identify, assess, and reduce potential risks or threats that could negatively impact an organization's objectives, assets, or operations. The primary goal is to minimize the likelihood or impact of these risks through specific actions. Mitigation strategies include risk acceptance, where the risk is acknowledged but no action is taken due to minimal impact; risk avoidance, which involves changing plans or processes to eliminate the threat; risk reduction, which implements measures to lessen the likelihood or impact of the risk; risk transfer, where the risk is shifted to another party, such as through insurance; and risk monitoring, which involves continuously observing the risk environment to detect and respond to changes promptly. These strategies collectively help manage uncertainties and ensure smoother operations.



Emergency team staffing and responsibilities

AHF operates globally and across the United States. The Managed Care Division has Utilization Management and Care Management operations in part in Fort Lauderdale, Florida.

In the event of an emergency that adversely affects operations and staffing in Los Angeles, the plan has process in place to redirect the following operations from Los Angeles to Florida:

- Member Services and Utilization Management/Care Management – AHF uses a cloud-based call center application called 8x8 which allows the departments to shift call center answer groups to remote staff if necessary. The remote staff have either an 8x8 desk phone or have the 8x8 app on their smart phones and will take calls that Los Angeles-based would otherwise answer. These remote staff currently provide backup to Los Angeles staff when call volumes are high and/or staff is out of the office.

AHF uses web-based health plan and UM/CM systems, so remote staff are able access needed data to render services.

- Claims – AHF uses a web-based health plan system for its enrollee eligibility and enrollment management, provider data and claims adjudication. This application can be accessed by remote staff in Florida so claims processing can be continued in the event Los Angeles-based operations are adversely affected.

Cooperative agreements

AHF operates AHF Pharmacy which has retail locations across the country. The Division operates a call center with hubs in Gardena, California, Melville, New York and Fort Lauderdale, Florida. If necessary, based on volume and staffing, the Managed Care Division will shift calls to the AHF Pharmacy call center for help.

AHF had a prior agreement with Catalyst Solutions, a BPO that assisted the Division with claims data entry and processing. If an emergency occurs in the Los Angeles area that shuts down operations for more than a few weeks, AHF will re-engage with this vendor, which is located in Colorado with a remote workforce, for back up assistance to process claims.



Training and drills

AHF's Safety and Security Department created an Emergency Action Plan (EAP), which was developed for each AHF site. This document specifies AHF emergency procedures for in the event of various incidents.

System recovery

In that the Managed Care Division's operating systems are all web-based (in the cloud), it's call center, plan management, and UM/CM systems and website are not subject to going down should a business disruption occur in Los Angeles. Each system has its own disaster recovery plan which is housed at AHF's IT Department.



Enrollee Emergency Preparedness Plan

This chapter of the Emergency Preparedness and Response Plan AHF's enrollee emergency preparedness plan addresses:

- Enrollee communications
- Continuity of covered services
- Network provider and subcontractor emergency requirements

Enrollee communications

The Managed Care Division has contracted with communications vendor, Prevision, that offers a mass communication system for enrollees called Preventive Care as a Service (PCaaS). This system is web-based and allows the Managed Care Division to send enrollees who opt in text messages and/or email messages. It also allows for the plan to send and IVR messages to enrollees' phones. This particular application is critical in Division's communication strategy during an emergency situation.

Authorized users of the PCaaS system can enter the message he/she wants to send and specify when and how.

The other mode of enrollee communication is the plan's website. Since the website is hosted in the cloud, updates to the site can be made by remote staff as needed. The plan will update the website with instructions for enrollees to obtain health care and prescription drugs through Medi-Cal Rx during an emergency.

During an emergency and post-emergency, the plan will maintain its call center as described above using staff who are versed in emergency protocols which include warm transfer to RNs and physicians who can triage services for emergent need. In addition, the plan's 24/7 Nurse Advice Line will also be available to enrollees. The nurse advice service, through CareNet, operates call centers across the country and will not be affected by an emergency or disaster in Los Angeles County.

The plan will also notify enrollees through the call center about alternative pharmacies, dialysis centers, oncology centers or other infusion therapy locations and other treatment sites and how to obtain DME, if needed.

The plan will notify enrollees through the call center and website of its emergency protocols that remove authorization requirements for care, allow enrollees to see noncontracted providers if participating providers are not available.



Continuity of covered services

If the Governor of California, the U.S. Secretary of Health and Human Services, or the President of the United States declares a state of disaster or emergency in Los Angeles County, the plan implements emergency protocols for continuity of care.

During a disaster, the plan allows enrollees to obtain care from noncontracted providers. If an enrollee sees a noncontracted provider and he or she bills the enrollee for care during a disaster, enrollees are to send the plan the bill so that we can pay it. Enrollees are not expected to pay the bill. If enrollees pay for medical services from noncontracted providers, the plan will reimburse those enrollees.

This notice will be placed proximately on the plan's website and reiterated in the plan's enrollee newsletters.

As noted above, during an emergency, the plan removes authorization requirements for needed care. It will also extend filing deadlines for grievances and request for appeals in accordance with the Contract.

In addition to allowing enrollees to see noncontracted providers, the plan will coordinate, transfer and refer enrollees to alternate sources of care when network providers are unavailable.

The plan, when directed by DHCS, will provide a toll-free telephone number for displaced enrollees to call with questions, including questions about the loss of a Beneficiary Identification Card, access to prescription refills, and how to access health care.

Network provider and subcontractor emergency requirements

The plan will provide network providers and subcontractors with an emergency preparedness fact sheet and resources on general emergency preparedness. Note that the plan does not have any downstream subcontractors, hence this term is omitted from this section. In addition, it educates network providers and subcontractors its emergency policies and procedures.

In the event of disaster or emergency declaration, network providers and subcontractors are expected to advise the plan if their operations have been affected. The plan has a



toll-free provider relations line that is part of its call center, which will operate during an emergency.

The plan will use its PCaaS system, as described above, to communicate with network providers and subcontractors about what modifications need to be implemented during an emergency to ensure that enrollees are able to access covered services.

The plan will ensure that provider service agreements state that network providers are required to:

- Annually submit evidence of adherence to Centers for Medicare & Medicaid Services Emergency Preparedness Final Rule (FR), 81 FR 63859, and 84 FR 51732;
- Advise contractor as part of the network provider's emergency plan; and
- Notify contractor within 24 hours of an emergency if the network provider closes down, is unable to meet the demands of a medical surge, or is otherwise affected by an emergency.

