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## North Sound Behavioral Health Administrative Services Organization, LLC

Section 4000 - Information Systems: Emergency Mode Operations

Authorizing Source: HCA Contract

Approved by: Executive Director

Date: 5/24/2022

Signature:

### POLICY #4023.00

#### SUBJECT: EMERGENCY MODE OPERATIONS

#### PURPOSE

North Sound Behavioral Health Administrative Services Organization (North Sound BH-ASO) has implemented security measures to safeguard Protected Health Information (PHI) in the event an emergency should occur to impair normal security safeguards. The BH-ASO team members responsible for implementing recovery procedures are specified in detail in the Business Continuity and Disaster Recovery Plan (BCDRP).

#### POLICY

It is North Sound BH-ASO policy to have a contingency plan in place to provide emergency access to ePHI for employees and partner agencies while operating in emergency mode in accordance with 45 Code of Federal Regulation (CFR) 164.308(a)(7)(ii)(C).

#### PROCEDURE

To provide temporary alternate procedures to protect PHI and resume mission critical operations should the primary facility become unavailable for a short period of time due to adverse weather conditions, or an extended power or internet outage. North Sound BH-ASO Health Insurance Portability and Accountability Act (HIPAA) Security Officer has created more detailed operating procedures outlined in the BCDRP should resources at the main facility become unavailable for a prolonged period.

1. During an emergency that disrupts power for a period more than 24 hours, North Sound BH-ASO internal network will be shut down. North Sound BH-ASO staff will be prepared to implement the following alternate work plan:
  - a. Work from home or other location with fast internet access available, utilizing the following organization issued technologies:
    - i. Mobile laptop with power supply;
    - ii. iPhone for business phone and internet access;
    - iii. Verizon LTE hotspot for internet connectivity;
    - iv. Cisco Z3 VPN network extender (office power permitting); and
    - v. Cloud Microsoft Office 365 and Teams for email, calendars, notebooks, critical documents, and to facilitate recovery team communication.
  - b. During a prolonged power outage, Clinical staff will establish connection remotely via their laptops and mobile phones.
    - i. Requests for authorization can be directed to:
      - 1) [Auth\\_Request@nsbhaso.org](mailto:Auth_Request@nsbhaso.org) or,
      - 2) [Inpatient\\_Request@nsbhaso.org](mailto:Inpatient_Request@nsbhaso.org), or
      - 3) ASO Clinical Manager at 360.941.1301 or,

- 4) Volunteers of America (VOA) at 800.707.4656.
  - ii. Requester and North Sound BH-ASO Clinical can verbally review the authorization request and will request the provider to mail supporting clinical documentation.
  - iii. Clinical will maintain a remote authorization log during the time of outage.
  - iv. Delegates must address maintaining their capability to process non-Medicaid Involuntary Treatment Act certification during times of system outage.
2. A power loss that disrupts services of the main facility are enough reason to close the North Sound BH-ASO offices. After facility power is restored, the North Sound BH-ASO Information Technology (IT) Manager, Security Officer and IT team members will conduct an inventory of any damage to information systems, components and other critical equipment and document inconsistencies. Extreme weather conditions at the main office are also enough to close the North Sound BH-ASO office. In these cases, critical business could still be conducted remotely.
3. Normal essential business services at the main North Sound BH-ASO location are:
  - a. Electricity: available 8AM to 5PM, Mon-Fri except holidays;
  - b. Network, internet and email Connectivity: available 8AM – 5PM, Mon-Fri;
  - c. Telephones and 800 number service: 8AM-5PM, Mon-Fri;
  - d. Workstation client computers and servers;
  - e. Heating, Ventilation and Air Conditioning (HVAC);
  - f. Lighting: 8AM to 5PM, Mon-Fri;
  - g. North Sound BH-ASO does not provide patient care therefore would not need to provide stabilizing treatment or facilitate transfer of care.

Any contractors who share North Sound BH-ASO workspaces are notified of all facility plans, tests, drills, holidays, facility emergencies and all planned and unplanned office closures and will make their own decisions accordingly.

#### **MONITORING**

North Sound BH-ASO will verify their delegate contractors' and providers' corresponding Emergency Mode Operation plans and related policies through annual monitoring recommendations, audit findings and/or corrective action plans to be carried out through continuous improvement projects.

#### **REFERENCES**

4022.00 Business Continuity Disaster Recovery (BCDR) Policy

North Sound BH-ASO Business Continuity and Disaster Recovery Plan (BCDRP)

#### **ATTACHMENTS**

None