

NAVIGANT

**Business Continuity Plan (BCP)
Instructional Guide**

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List of Acronyms and Abbreviations

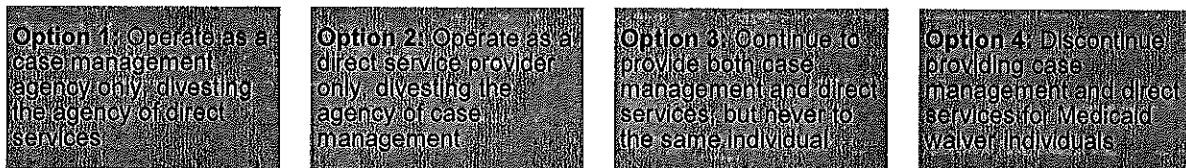
Acronym/ Abbreviation	Definition
BCP	Business Continuity Plan
CAP	Corrective Action Plan
CCB	Community Centered Boards
CMS	Centers for Medicare & Medicaid Services
HCBS	Home and Community-Based Services
SEP	Single Entry Point

Section 1 Introduction and Purpose

In 2014, the Centers for Medicare & Medicaid Services (CMS) implemented a final rule to reduce conflict of interest for services provided under home and community-based services (HCBS) waivers by separating case management from service delivery functions. In response, Colorado passed House Bill 15-1318, which, in part, required the Department of Health Care Policy and Financing (HCPF) to develop a plan for the delivery of conflict-free case management services and a reasonable timeline for implementation of the plan, with input from Community Centered Boards (CCBs), Single Entry Point (SEP) agencies, and other stakeholders. In addition, Colorado passed HB17-1343 in 2017, which created the definition of case management agency and required HCPF to develop qualifications for case management agencies and case managers. While HB17-1343 is specific to individuals with Intellectual and Developmental Disabilities (I/DD), HCPF is restructuring case management for all individuals enrolled in an HCBS waiver.

HB17-1343 also required HCPF to develop requirements for a Business Continuity Plan (BCP) in which an agency will select which option it will choose for continuing business as well as identify how an agency will transition to new operations to comply with federal and state statute and regulation. The BCP must be submitted by agencies to HCPF by July 1, 2018. Existing agencies must modify their operations and administrative practices to adhere to new federal and state regulations. As a result, current agencies are offered four options with regards to how they conduct business. These options are highlighted in Figure 1.

Figure 1: Options for Continuing Business



In response, HCPF developed BCP requirements for CCBs and SEPs to decide how the agency will continue operations while meeting requirements for conflict-free case management. The objectives of the BCP are the following:

1. To identify which of the four options an agency has chosen for continuing operations;
2. To determine if existing agencies have sufficiently outlined their operational and administrative plans for becoming conflict-free;
3. To identify the operational requirements that agencies must meet to provide case management services and/or waiver services; and
4. To identify requirements that agencies must meet if deciding not to provide case management or waiver services.

HCPF will assess responses provided by the agency to identify:

- If the requirement has been sufficiently met; and
- If a corrective action plan (CAP) is needed to help the agency sufficiently meet the requirement.

Additional detail will be provided in the following sections of this instructional guide.

Section 2 Business Continuity Plan Overview

The BCP is pre-populated with the requirements and other criteria that the agency must use to demonstrate how the agency will operate under its chosen option and that its chosen option will ensure continuity of care for individuals, while being compliant with federal and state statute and regulations. The BCP is composed of six worksheets and a cover sheet. Figure 2 identifies and describes the tabs in the BCP workbook.

Figure 2. First Six Tabs in the BCP Workbook

Cover Sheet	Introduces the BCP Checklist to the user and provides some background information and summary of instructions
General Info	Collects general information about what services the agencies intend to provide and if they plan to request or have requested a rural exception
CM Only	Identifies all requirements agencies must meet prior to providing only case management services
Services Only	Identifies all requirements an agency must meet prior to providing only direct services
CM and Services	Identifies all requirements an agency must meet prior to providing both case management and direct services
Org Closure	Identifies all requirements an agency must meet prior to ceasing operations
Rural Exception	Identifies all requirements an agency must meet if approval is received for rural exception when providing both case management and direct services

If an agency has requested a rural exception, the agency must fill out the CM and Services tab along with the Rural Exception tab. Each worksheet, other than the General Info worksheet, requires inputs from the agency and HCPF. The next sections of this instructional guide will highlight responsibilities of the agency and HCPF.

Section 3 Business Continuity Plan Guide

The following sections highlight the various worksheets that make up the BCP.

Cover Sheet

The Cover Sheet includes basic information about the agency and the date the document is submitted to HCPF for review. This sheet also has a summary of instructions as a reminder for the agency. Please review the instructions in its entirety before filling out the document.

General Info Worksheet

The General Info worksheet provides a summary of the services that the agency intends to provide and will collect the following information:

Table 1: General Info Worksheet Details

Row Header	Description
Agency Name	Name of the agency completing the BCP
Date Submitted	Date agency is submitting the BCP to HCPF.
Services Intended	Identification of the services the agency intends to provide. This field is a dropdown with the following four service options: Option 1: Case Management Services Only Option 2: Direct Services Only Option 3: Case Management and Direct Services Option 4: Will not continue services
Rural Exception Requested	Identification of whether the agency has requested a rural exception. This field is a dropdown list of Yes or No
Additional Comments	Any additional comments the agency may have regarding the BCP

Each agency will be required to complete up to two additional worksheets. Every agency must provide responses in the BCP tool based on their services intended selection in the General Info worksheet. For example, if an agency decides to only provide case management services, they would need to fill out all requirements listed in the Case Management worksheet. Additionally, if an agency has requested a rural exception, they will also be required to fill out the Rural Exception worksheet as well as the worksheet for Option 3, Case Management and Direct Services.

CM Only, Services Only, CM and Services, Org Closure, and Rural Exception Worksheets

Each worksheet contains requirements, which will help HCPF assess the agency's ability to administratively and operationally provide conflict-free services. HCPF will prepopulate the requirements in the BCP and identify related documents that must be submitted by the agencies to address the requirement. The pre-populated columns are the following:

Table 2. Pre-populated columns in BCP

Column Header	Description
No.	The number associated with each BCP requirement
Topic Area	The general BCP topic area that applies to the specific corresponding requirement. Topic areas include: <ul style="list-style-type: none"> • Administration • Financial • Staffing • Covered Services • Quality • Conflict of Interest (COI) – CM and Services tab only
Requirement	The HCPF requirement that the agency must meet prior to delivering (or not delivering) case management services, direct services, or both
Required Documentation	The documentation that the agency must provide to prove that they have met the requirements

Agencies filling out the BCP will be responsible for providing their responses to each of the requirements identified by HCPF, as described in Table 3.

Table 3. Agency's Response to BCP

Column Header	Description
List of Submitted Deliverables by the agency	The documentation that the agency has provided to prove that they meet the requirement. These documents should closely align with what is found in the "Required Documentation" column
Agency's Response	Commentary provided by the agency explaining how the provided documentation sufficiently addresses the BCP requirement

Only complete the applicable worksheet, which is directly related to the "Services Intended" row of the General Info worksheet.

How to Prepare Deliverables and Responses for HCPF

Agencies are responsible for submitting documents, identified in the BCP, and providing an explanation about each document submitted. The next section explains how agencies can prepare the deliverables and responses for HCPF.

List of Submitted Deliverables by the Agency: File Name Conventions and How to Organize and Submit Files

To organize the files and for ease of identifying files, this document demonstrates filename conventions to be applied for all documents. Table 4 provides additional description of the filename.

Table 4: Filename Descriptions

Filename Element	Description
Tab Name	The identification of the tab being completed, which are the following ¹ : Op1 – If responding to Option 1 Op2 – If responding to Option 2 Op3 – If responding to Option 3 Op4 – If responding to Option 4 RE – If responding to Rural Exception
Requirement #	The identification of the requirement number. This is Column A, No., of the BCP
Requirement Documentation #	The Required Documentation column lists documents HCPF looks for to meet the requirement. Some requirements have multiple documents listed. All documents have a numeric label. This is the number of the documentation identified in Column D, Required Documentation, of the BCP
Optional File	For each item from the Required Documentation column, an agency might choose to submit more than one file. In these cases, use the alphabet, starting with the letter a, to assign the optional file name as part of your naming convention
Agency Name	Include name of the agency. Abbreviations are permitted, if abbreviations are spelled out on the BCP Cover Sheet
File Type	These are assigned by the computer system. For example, typically, a word document has .doc or .docx assigned

¹ Refer to Table 1 and Figure 1 of this document for the details of four options.

For example, XYZ agency is submitting a document to meet the following requirement shown in Figure 3. XYZ agency chose option 1, case management only.

Figure 3: Example Requirement

No.	Topic Area	Requirement	Required Documentation
1	Administration	The CCB has set up and maintains a business office or work site within the State of Colorado	1. Lease

If the agency has two separate leases that they want to provide. The filenames should be:

- **Op1_1_1_a_XYZ.pdf**
- **Op1_1_1_b_XYZ.pdf**

These filenames must be listed in the "List of Submitted Deliverables by Agency" column. Upon completion, the agency will upload files to the HCPF-designated SharePoint site. Each agency will upload documents to Business Continuity Plan folder in the agency's SharePoint site. If the agency submits other documents that are not part of the requirements, the "Requirement Number" portion of the filling name convention will be "0".

Agency's Response Column: What to Include as an Explanation

All agencies can include any relevant explanations that will aid the HCPF reviewer to determine how the submitted file meets the requirement. In our example, XYZ agency submitted two leases. The agency can include an explanation of why there are two leases – one for administration office and another for the case management office which are near each other but has two separate leases.

This is merely a simplified example. Agencies can attach another document to further explain the document or justify the submission.

Section 5 HCPF Responsibilities

Evaluation and Status of BCP Requirements

HCPF will be responsible for reviewing submitted documents by the agencies. HCPF will review all documentation, identify potential risks, and update the status of the requirement, accordingly. HCPF will also determine if the agencies need to be issued a CAP to become compliant with the requirement.

The HCPF reviewer must clearly document the logic and reason why a status is marked incomplete. Clearly reference why a specific document(s) did not meet the requirement and why. This activity will assist with the Corrective Action Plan development, which is described in the next section.

Corrective Action Plan Process

Agencies are required to complete Corrective Action Plans (CAPs) for deficiencies identified in the BCP Tool. CAPs are divided up by deficiency, with each deficiency requiring a separate CAP tool. The HCPF Team will populate each CAP template with items that are marked as Pending or Incomplete in the Tool. Agencies will be monitored for the completion of the CAP, and once the deficiency is addressed, the CAP will be closed. If CAPs are not completed within the provided timeframe, this will impact the agency's ability to enact upon the service offerings outlined in their BCP.

Next Steps

After internal review and discussions, the HCPF Reviewer will contact the agency to discuss the results of the documentation review and inform the agency of the next steps in the process. If agencies did not meet the requirements or there are risk areas identified, the HCPF Team will establish a CAP with the agency and work to address the issues.

BCP approval is not a contract or a commitment by the HCPF to enter into a contract on these or other findings. It is not to be construed as creating a contract, or a property right or interest, or an expectation that HCPF will enter into a contract with any agency. HCPF reserves the right to add, alter, change and/or delete any or all terms and provisions of this document at any time.