

TUFTS HEALTH PLAN CORPORATE CONTINUITY STRATEGY

OVERVIEW

The intent of this document is to provide external customers and auditors with a high-level overview of the Tufts Health Plan Corporate Continuity Program (CCP). The document answers the most commonly asked questions about the program, explaining the program's governance, structure, and key features.

This overview emphasizes Tufts Health Plan's commitment to provide for the availability of its systems and services through a comprehensive management program that incorporates incident prevention, preparedness, and response.

CORPORATE CONTINUITY PROGRAM

The CCP promotes Tufts Health Plan's ability to prepare for, and successfully recover from, any business services interruptions. The CCP incorporates industry best practices to manage availability risks, prepare contingency plans, and respond to actual emergencies.

Risks and events anticipated by the CCP include natural disasters, critical technological emergencies, events affecting our facilities, workforce interruptions, and any other incidents that could severely affect corporate operations.

The program is structured into three focus areas:

- Business Continuity
- Disaster Recovery
- Workforce Continuity

Program Structure

- Business Continuity
- Disaster Recovery
- Workforce Continuity



BUSINESS CONTINUITY

Business Continuity (BC) refers to the process of developing continuity strategies that will enable Tufts Health Plan to prevent and mitigate interruptions of business services. There are four key activities in this process:

- Impact analysis of potential adverse events
- Classification of business systems and functions
- Establishment of service-level thresholds and recovery time objectives for systems and functions

- Related procedures for maintaining this information in a changing environment



BC also includes the development of strategies and procedures to manage and mitigate continuity risks. Examples of these include

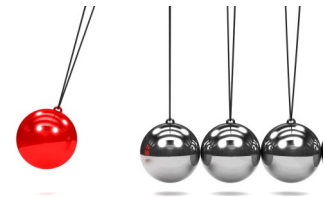
secured operation strategies, data backup and offsite storage provisions, system redundancy/failover strategies, and contingency arrangements with key vendors and individual system recovery provisions not requiring a full disaster declaration.

Business Impact Analysis

Tufts Health Plan prioritizes its various business functions using a comprehensive Business Impact Analysis (BIA) methodology. This analysis examines financial, operational, contractual, regulatory, and service reputation considerations that are the

basis for Tufts Health Plan's *Corporate Continuity Policy*.

The BIA is referenced when significant changes are introduced into the Tufts Health Plan environment and routinely reviewed over the course of the year.



Business Unit Recovery Plans

Each department maintains a formal business recovery plan that outlines the critical business functions that will be recovered, and the time frame for and method of recovery in compliance with the findings of the BIA. These plans also identify any system, personnel, documentation or supply dependencies related to these critical operations. All department business recovery

plans are maintained in a centralized and secured continuity software program that is stored offsite and accessible through the intranet.



Tufts Health Plan's recovery plans are tested regularly, and include end-user groups as part of the testing protocol to evaluate restored systems. Manual work-around procedures are also used where appropriate and efficient.

Secured Operations

Tufts Health Plan’s critical applications and servers run in a secured Tier 3 data center staffed 24x7x365 by Tufts Health Plan personnel.

Access to the data is controlled by using proximity cards, biometrics readers, and digitally-recorded closed-circuit television cameras. Visitors to the data center must be escorted by authorized Tufts Health Plan personnel, and are required to sign in and out when entering and leaving the facility.



All computer systems and related equipment are initially supported by two Uninterrupted Power Supplies (UPS), and then by two backup diesel generators that are located onsite.

The data center is constructed with floor-to-ceiling walls and is protected by a fire suppression system that includes addressable/intelligent ionization and photoelectric smoke detectors located on the ceiling and beneath the raised access floor.

Data Backup and Offsite Storage

Tufts Health Plan contracts with an industry-leading vendor to provide offsite storage for critical records and recovery media. Media is encrypted and transported in locked bar-coded containers. Media that is transported offsite is tracked in logs, which are reviewed periodically.

Wherever possible Tufts Health Plan uses data replication from its main data center in Watertown, MA to our contracted secure disaster recovery mega center. This includes data at rest from our backup infrastructure, as well as live data replication, where

applicable. Backups of all mid-range platforms and LAN systems are performed daily, and copies are replicated offsite.



Backups are performed daily for the purposes of maintaining historical data and file-based recovery. Tapes that exceed our data retention periods are automatically recalled to our

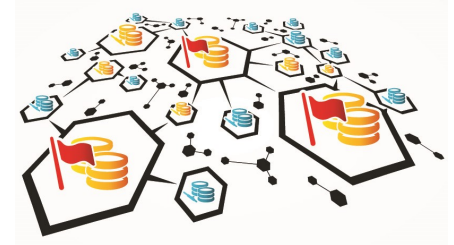
data center for re-use (overwritten) or disposal.

By combining industry best practices with leading edge technologies, Tufts Health Plan is able to reduce or eliminate both recovery times and the risk of data loss, across multiple platforms and applications.

DISASTER RECOVERY

Disaster Recovery (DR) refers to the process of recovering key business systems and services if Tufts Health Plan's primary site becomes severely damaged or otherwise unavailable. Key activities within DR (for both on-site and cloud-based systems) include the development of recovery

strategies, the documentation and maintenance of recovery procedures, and the continuous improvement of these services through regular testing and review.



Recovery Services Contract

As a key component of the DR strategy, Tufts Health Plan has contracted with an industry-leading recovery services vendor to provide backup computer systems, hardware, and facilities for Tufts Health Plan's use for a large-scale systems recovery.

The contract provides Tufts Health Plan with the use of a mega center for the recovery of critical information systems and a metro center for business workspace. The location of these facilities is flexible to

accommodate regional incidents.

Recovery plans for each Information Systems department include procedures for the recovery of systems at the vendor's facilities. The plans include these elements:

- Defined recovery roles and responsibilities
- Systems backup and recovery procedures, including offsite media storage retrieval information

- Detailed production system hardware and software configurations/specifications
- Emergency and critical business contact information

All departments maintain a continuity plan for both primary and extended recovery periods.

Recovery Time Objective

Tufts Health Plan has a target Recovery Time Objective (RTO) of 48 hours from the point of disaster declaration for all business critical systems.



Recovery Testing

Tufts Health Plan conducts regular tests of the corporate recovery plans. This test is conducted over a four-day time period at the recovery services facilities, and includes end-user groups as part of the testing protocol to evaluate restored systems.

All systems designated for test recovery are restored using the actual plans maintained by each department. A formal test report is documented that

identifies issues and lessons learned for use in continuous improvement. The Tufts Health Plan Internal Audit department may audit recovery exercises as they deem necessary. Departmental observers are also invited to observe the activities. Tufts Health Plan’s last recovery test was conducted in June 2019. The next test is scheduled for June 2020.



Workforce Continuity

Workforce Continuity is the process of putting in place the appropriate telecommuting and collaborative tools and policies in the event employees are unable to meet in the office for any reason.

Support of Tufts Health Plan workforce continuity includes:

Emergency Communications

- Mass communication tool: Crisis communication and employee well being
- Updated lists of contact information: Stored in web-based continuity management tool that can be accessed 24/7/365 – also source of record for mass communication tool

Alternate Work Locations

- Remote connectivity

Pandemic Preparedness

- WHO/CDC guidelines, best practices
- Departmental pandemic policies
- Mission critical absenteeism plans
- Surveillance & response planning
- Collaboration with CDC, Nedrix, AHIP

Employee Awareness

- Plan, test, maintain, and communicate



For additional information, contact Diana White at ext. 52182 or diana_white@tufts-health.com.