

POINT32HEALTH CORPORATE CONTINUITY STRATEGY

OVERVIEW

The intent of this document is to provide external customers and auditors with a high-level overview of the Point32Health Corporate Continuity Program (CCP). The document answers the most commonly asked questions about the program, explaining the program's governance, structure, and key features for Harvard Pilgrim Health Care, a Point32Health company.

This overview emphasizes Point32Health's commitment to provide for the availability of its systems and services through a comprehensive management program that incorporates incident prevention, preparedness, and response.

Program Structure

- Business Continuity
- Disaster Recovery
- Workforce Continuity

CORPORATE CONTINUITY PROGRAM

The CCP promotes Harvard Pilgrim Health Care'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



BUSINESS CONTINUITY

Business Continuity (BC) refers to the process of developing continuity strategies that will enable Harvard Pilgrim Health Care 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

Harvard Pilgrim Health Care 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 Point32Health's *Corporate Continuity Policy*.

The BIA is referenced when significant changes are introduced into the Harvard Pilgrim Health

Care 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 is always accessible.

Harvard Pilgrim Health Care'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

Harvard Pilgrim Health Care’s critical applications and servers run in a secured data center staffed 24x7x365 by Harvard Pilgrim Health Care’s strategic Partner NTT DATA.

Access to the data center is controlled by using proximity cards and digitally recorded closed-circuit television cameras. Visitors to the data center must be escorted by authorized Harvard Pilgrim Health Care and/or data center provider personnel, and are required to preregister and sign in/out when entering and leaving the facility.



All computer systems and related equipment are supported by a fully redundant 2N power system, including Uninterrupted Power Supplies (UPS) and backup diesel generators that are located onsite.

Multiple solutions provide cooling and hot air removal, a building-

wide redundant system delivers cooling to all mission critical sections of the building, as well as protection by advanced fire suppression systems.

Data Backup and Offsite Storage

Harvard Pilgrim Health Care contracts with an industry-leading vendor to provide offsite storage for critical records and recovery media. Media is encrypted and transported securely in bar-coded containers with locking zip ties. Media that is transported offsite is tracked in logs, which are reviewed periodically.

Wherever possible, Harvard Pilgrim Health Care uses data replication from its main data center in Quincy, MA to our strategic partner NTT DATA’s secure Plano Technology Center.

This secondary site provides geographic isolation from our primary site and mitigates operational risks by distributing Harvard Pilgrim’s IT assets

between a production data center and a development data center. Harvard Pilgrim’s robust Pathway to Production pre-production



environments have the capability to host production operations in the event of a disaster. This includes data at rest from our replicated backup infrastructure, as well as live data replication, where applicable. Backups of all mid-range platforms and LAN systems are performed, 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, Harvard Pilgrim Health Care reduces or eliminates 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 Harvard Pilgrim Health Care’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, Harvard Pilgrim Health Care contracts with NTT DATA for its development and disaster recovery facilities in NTT DATA’s world class Plano Technology Data Center. Harvard Pilgrim’s robust Pathway to Production pre-production environments host pre-

production versions. Multiple exercises have confirmed that a remote recovery is achievable.



Technical Recovery Plans

Recovery plans include:

- 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



Recovery Time Objective

Harvard Pilgrim Health Care has a target Recovery Time Objective (RTO) of 24 hours from the point of disaster declaration for all business critical systems.



Recovery Testing

Harvard Pilgrim Health Care conducts regular tests of the corporate data recovery plans by updating and validating our pathway to production environments two to three times annually. These updates are conducted at our development data center facilities and include automated and manual testing protocols to evaluate the integrity and coherence of restored environments.

All systems designated for test recovery are restored using the actual plans maintained by our environments team in conjunction with the IT/Business owner in each department. A formal test report is documented that identifies issues and lessons learned for use in continuous improvement.

The Harvard Pilgrim Health Care Internal Audit department may audit recovery exercises as they deem necessary.

Harvard Pilgrim Health Care's last recovery test was conducted in February 2023. The next environmental refresh exercise will be conducted in Q1 of 2024.



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 congregate in the office for any reason.

Support of Harvard Pilgrim Health Care workforce continuity includes:

Emergency Communications

- Mass communication tool for crisis communication and employee well-being

Alternate Work Locations

- Remote connectivity with redundant VPN connectivity to primary and alternate data centers

Pandemic Preparedness

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

Employee Awareness

- Plan, test, maintain, and communicate



For additional information, contact the [Corporate Continuity Program Mailbox@point32health.org](mailto:Corporate_Continuity_Program_Mailbox@point32health.org).