# UNITEDHEALTH GROUP®



# Enterprise Resiliency & Response Program Customer Overview

# March 1, 2020

# Table of Contents

# Section I – Enterprise Resiliency & Response Overview

## Background

The purpose of this document is to demonstrate how the Enterprise Resiliency & Response Program, with the interrelated services of event management, site emergency planning, business continuity planning, disaster recovery planning, and response to events impacting public health and pandemics, are designed to ensure we can react quickly to all forms as disasters, minimizing potential negative impacts to our operations and vital services.

UnitedHealth Group has an Enterprise Resiliency & Response Program (the Program) that minimizes customer impact from disrupted service in a significant event or disaster, while aiding compliance to published regulatory guidelines.

The Program helps prevent and/or mitigate the impact of events that could disrupt our business by containing the impact within a predictable and predetermined period of time. Effective business continuity planning establishes the basis from which business processes and operations, including service to customers, are resumed.

We have business contingency planning preventative controls, contingency resources, and procedures administered by a formal internal management organization. In addition, we have developed a contingency process that minimizes customer impact from disrupted service during an event while aiding compliance to published regulatory guidelines.

## Mission Statement

The mission of the Program is to:

- Provide for the safety of our employees in the event of a business disruption or disaster
- Demonstrate our consumer-focus and service excellence when our customers and members are vulnerable after an event
- Minimize service disruptions
- Meet customer and other stakeholder expectations
- Preserve customer information
- Protect and preserve UnitedHealth Group's organizational assets, including people, process, technology and information
- Comply with laws and regulations regarding the continuity of operations
- Enhance our competitive position, market share and reputation

This mission can only be achieved through management and control of business impact and risk; therefore, the program focuses on designated critical operations and sites. The level of business continuity safeguards are based on the business impact of the business segment's critical operations, sites, assets, and their inherent vulnerabilities.

## Policy

UnitedHealth Group recognizes and acknowledges that the protection of its assets and business operations is a major responsibility to its employees, shareholders, business associations, customers and

other communities that it services. Therefore, it is UnitedHealth Group's policy that business continuity and disaster recovery plans must be developed, tested, and maintained in order to limit losses caused by disruptions to critical business operations and to enable efficient and effective recovery. The Program include processes and controls to protect the business of UnitedHealth Group, the life and safety of workforce members, as well as to protect the image, reputation, assets, and resources of the organization.

## Objective

The objectives of the Program are to continue to serve customers, minimize financial loss to the organization, and minimize the negative effects disruptions can have on strategic plans, reputation, operations, liquidity, credit quality, market position and ability to remain in compliance with applicable laws and regulations. Changing business processes, internally to the organization and externally among interdependent vendors and partners, and new threat scenarios require UnitedHealth Group to maintain updated and viable business continuity plans.

In order to carry out the Program mission, UnitedHealth Group has adopted a business continuity strategy to address the key business interruption risks that stem from the deployment and use of our people, processes, technology and financial assets in carrying out the day-to-day business operations. This strategy focuses on our critical business functions and planning for the worst-case scenario so that we can react quickly and efficiently, adding value to our business and customers through effective risk reduction, compliance with industry, contractual or regulatory standards, and safeguarding of our operations and assets. This worst-case scenario covers all forms of events, both natural and man-made (e.g., hurricane, flood, fire, terrorism, public health emergencies, including pandemics, etc.).

## Program Strategy

The Program strategy requires that the ownership, responsibility and accountability for business continuity planning reside at the segment business operations level while providing for governance, standardization, and oversight at the enterprise level. This program encompasses a "layered" approach to continuity planning, which recognizes that risks to our business operations are inherent individually and to the environment as a whole due to the interdependent nature of our operations. Therefore, the continuity strategy is an appropriate combination of safeguards within our operations that work together to address inter-segment dependencies and meet the business continuity requirements of the segments individually, as well as UnitedHealth Group as a whole. Risk assessment, organizational accountabilities, governance and metrics are the foundational components of the Program and layered approach.

The Program integrates the appropriate levels of skills and required activities across all business operations. The level of business continuity safeguards required is based on the business impact of the critical operations, sites, assets and their inherent vulnerabilities.

Internal and external factors continually change business processes as well as risks, so the Program also includes lifecycle maintenance, testing and third-party validation.

The Program strategy integrates core planning assumptions in plan development. They are:

- The event which prompted the recovery process affects only internal business function(s) and/or site(s). Certain other public services infrastructure (fire, ambulance, police, etc.…) remain intact.
- Worst-case scenario is total disruption. If the actual event is not worse-case scenario, procedures will be modified within the appropriate strategies to only cover those critical business function(s) and processes affected by an event.
- Up to 50% of the function's staff at a particular site may be unavailable for work following an event. The event may affect multiple sites within a regional area.

- The off-site storage location is unaffected by the   event since geographical proximity  and accessibility were considered in site selection which minimizes the potential for the same event impacting both locations
- Operating efficiency will be reduced during the recovery and stabilization periods.  Processing will take longer and/or there may be greater instances of human error during survival-mode operation of the business function(s).

## The Layered Program Model

The layered Program model is focused on ensuring consistency between the organization's event management, site emergency response, corporate security, business continuity, disaster recovery and public health emergency planning efforts. These layers are interrelated and work together to provide maximum protection and risk mitigation. The model is built upon the following key components:

**Site Emergency Response**
Immediate employee
safety response

**Business Continuity**
Recovery/failover of
business operations

**Event Management**
(Enterprise & Segment)
Command and Control

"Solutions During Disasters"

**Public Health Emergency**
Response to support customers,
members, & the community

**Disaster Recovery**
Recovery/failover of IT
infrastructure & applications

## Organizational Accountabilities and Governance

The Program is implemented through an organization structure that requires active participation among all business stakeholders; including technology and business operations.  The Enterprise Resiliency & Response Office together with the Enterprise Disaster Recovery organization and  the Enterprise Resiliency & Response Steering Committee, comprised of corporate and segment executives, have the responsibility for defining the recovery project initiatives, oversight and support of the program which is in compliance with regulatory guidelines and customer expectations. Through the Program, the segments have responsibility and accountability to sustain the organization's capacity and readiness to manage an event through to resolution.
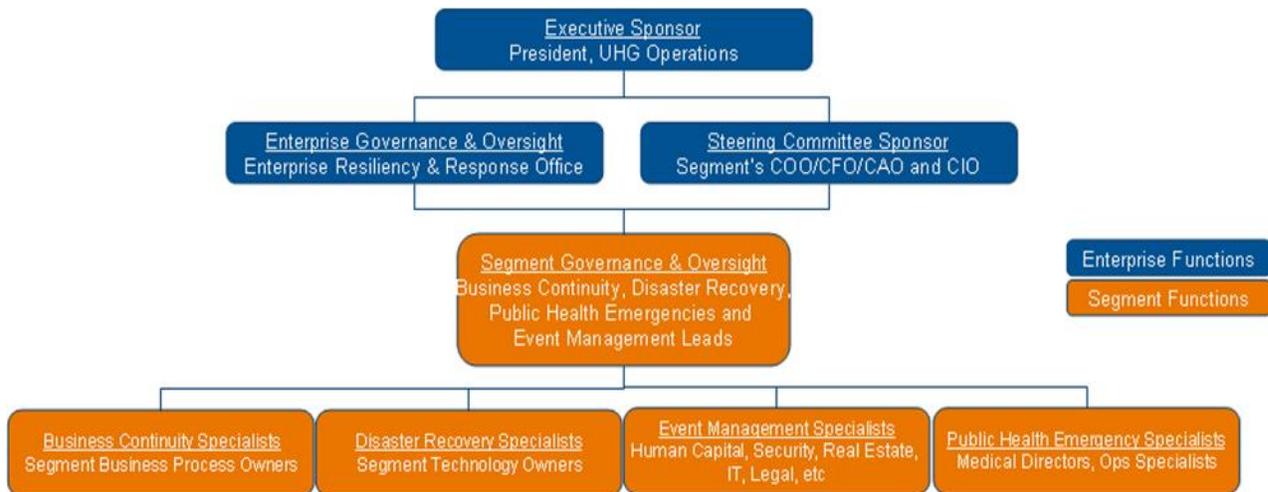
# Section II - Event Management Plan

## Event Management Strategy

Effectively managing a disruptive situation through to resolution in a large organization requires more rapid decision-making and communication process than is used for normal day-to-day business operations. As a result, the UnitedHealth Group event management plan outlines the management organization (event management team) and communication process to be utilized to facilitate a timely response to events affecting our personnel, business operations, and site locations, with the goal of avoiding or minimizing damage to the organization's ability to serve patients, members, customers and key stakeholders.

This plan identifies the event management team and outlines their key roles and responsibilities. The event management team is collectively responsible for managing the situation and making the critical decisions that drive remediation and coordination with various internal and external stakeholders as determined by the nature of the event and the short- and long-term impact on the organization. The event management team also supports execution on the event management decisions and provides central coordination of communications, resources, personnel, issues, and other information through the notification and response phases of event management.

The event management plan has been established to provide a framework to facilitate the effective response to, and recovery from an event. This plan provides the structure for:

- UnitedHealth Group's event management team;
- Event management process, including identification, escalation, notification and response channels as well as roles and responsibilities of the event management team;
- Established standards and checklist for the event management team, including, but not limited to: command center activation; damage assessment of people, information and property; risk management and safety; technology impact and response; and, employee, media and customer communications; and
- Disaster declaration standards

# Event Management Team

The primary purpose of the event management team is to provide a consistent and reliable approach for communication and engagement between all required parties necessary to manage an event. Subject matter experts, both at the corporate and segment level, continue to manage actions within their functional teams, however, will leverage the event management team as a forum to more quickly and reliably engage, communicate and make decisions between teams. The event management team:

- Consists of corporate and segment leadership with responsibility for event communication and response execution.
- Engages required executive leadership necessary to respond to the event.
- Executes on the decisions made by executive leadership and provide central coordination of communications, resources, personnel, issues, and other information through the notification and response phases of event management.
- Determines the strategy for how an event will be managed effectively and efficiently through to resolution. Responsible for facilitating the critical decisions that drive the remediation and coordination efforts with various internal and external stakeholders as determined by the nature of the event and the short- and long-term impact on the organization.
- Comprised of the following functional leaders or appropriate alternatives, as required:
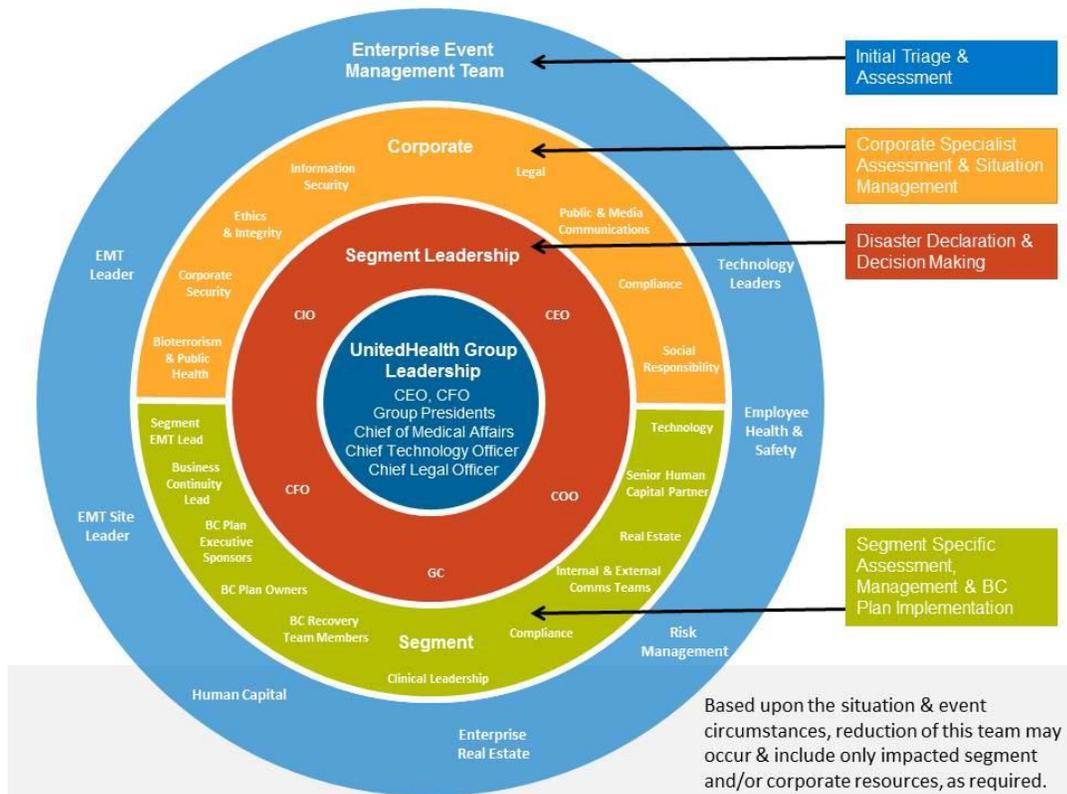
# Section III – Site Emergency Response

## Site Emergency Response Strategy

To support and facilitate a coordinated and controlled building occupant response in an emergency, UnitedHealth Group policy requires all offices with over 11 employees (over 10 in the State of California) have a site Emergency Action Plan (EAP). These plans focus on the immediate site needs during an emergency, such as employee evacuation and public services engagement. The company's emergency response team is often the first responder to a situation and help ensure that employees remain safe, sheltered and their basic life/safety needs are met.

Emergency action plans are used in conjunction with the event management process.

## Site Emergency Planning Standards

To help ensure consistency and effectiveness, the site Emergency Action Plans are developed using standard tools and templates. The following provides a high-level description of each of the sections contained within the individual site plans:

- *Purpose* – The purpose of the Emergency Action Plan.

- *Location Information* – Information pertaining to the physical location including building address and primary contact phone numbers.

- *Emergency Contact Information* – A list of key phone numbers including emergency services, Facilities Management and Security, where applicable.

- *Site Emergency Response Team Roles and Responsibilities* – Specific roles and responsibilities as defined including Event Management Team Site Lead, Emergency Response Team Site Lead, Security Crisis Response Team Lead, Floor Marshals, and Facilities Management.

- *Evacuation Maps:* Information pertaining to evacuation routes, exits, emergency shelter areas, designated areas for employees that need assistance to evacuate, location of first aid kits, etc.

- *Emergencies that may Result in Business Interruption or Office Closin*g – Procedures to engage the Event Management Team with communication procedures for domestic and international locations.

- *Reporting Procedures:*
    o Fire
    o One Breath Situations (Human Capital)
    o Workplace Fraud, Theft or Violence etc. (Corporate Security)
    o Utility Outages, Water leaks, Property Damage etc. (Facility Management/Portfolio Operations Center)
- General high level guidelines on hazard specific procedures such as medical emergencies, severe weather, fire, hazardous materials exposures or release etc.

# Lifecycle Maintenance

## Change Management and Update Process

In order to maintain an effective Program, site Emergency Action Plans are updated annually by the Emergency Response Team (ERT) Site Lead and monitored for compliance by the Enterprise Occupational Health & Safety Department

## Testing

The site Emergency Action Plans are tested at a minimum annually through drill techniques including fire, severe weather and/or earthquake. Drills may include tabletop (practical or simulated exercise), structured walk-through (functional), and/or large or full-scale (live or real-life exercise).

# Section IV - Business Continuity Planning

## Risk Assessment & Management

Business continuity planning requirements are driven by a business impact analysis, supporting the company's Enterprise Risk Management discipline as an integral part of UnitedHealth Group's culture, decision-making processes, and governance processes. The business impact analysis, combined with threat and risk assessments, helps assure that business continuity risks are appropriately prioritized and remediated by applying cost effective strategies and mechanisms to reduce risk to a tolerable level. The enterprise business impact analysis process:

- Identifies potential impact of uncontrolled, nonspecific events on UnitedHealth Group business processes and its customers;
- Considers all business segment functions; and
- Provides an estimation of maximum allowable downtime and acceptable levels of data and operational loss.

Each critical function is required to perform a risk assessment utilizing the business impact analysis, threat and vulnerability assessment, and gap analysis of business continuity mechanisms currently in place. The end result of this risk assessment is a segment commitment to reduce risk to an acceptable level within reasonable resource and budgetary constraints.

This risk-based approach further optimizes business continuity planning by creating common definitions, defining standards and best practices and using common recovery strategies to meet the business requirements.

## Business Continuity Plan Strategy

The business continuity plans are part of the overall program designed and structured to respond to disaster events, restore critical business function processes, and resume normal business function operations in a prioritized manner. The plans focus on critical business functions and planning for the worst-case scenarios so that we can react quickly and efficiently. These worst-case scenarios cover impacts from all types of events, both natural and man-made.

The following scenarios are provided as planning recovery objectives:

- **Loss of Facility** - Complete interruption of facilities without access to its equipment, local data and content. The interruption may impact a single site or multiple sites in a geographic region. Recovery from anything less than complete interruption will be achieved by using appropriate portions of the Plan.
- **Loss of Critical People** - Complete interruption with 100% loss of personnel within the first 24 hours and 50% loss of personnel long-term. The interruption may impact a single site or multiple sites in a geographic area. Recovery from anything less than complete interruption will be achieved by using appropriate portions of the Plan.
- **Loss of Critical Systems** - Complete interruption and/or access of critical systems and data located at the various UnitedHealth Group Data Centers for an extended period of time. Recovery from anything less than complete interruption will be achieved by using appropriate portions of the Plan.
- **Loss of Critical Vendors** - Complete interruption in a service or supply provided by a third-party vendor(s). Recovery from anything less than complete interruption will be achieved by using appropriate portions of the plan.

Having clearly defined the business recovery objectives, UnitedHealth Group developed recovery strategies needed to meet these objectives. These recovery strategies vary between Business Segment and the overall criticality rating of the business function or process, which in turn provides guidance on a minimum recovery time objective.

Business functions which are classified as critical generally provide for near immediate failover of core services by leveraging geographically dispersed redundant operations and maintain a recovery time objective of 72 hours or less. UnitedHealth Group's critical business functions include, but not limited to, healthcare delivery, customer and provider call services, claims processing services, clinical and pharmaceutical services, banking operations and core corporate functions.

A variety of business continuity strategies are deployed depending on the business function, criticality ranking and established recovery time objectives. These strategies include:

- **Resilient operations** - include dual site operations and continuous availability solutions. In the event of an interruption at one site the business function is transferred to one or more alternate locations at which staff and facilities are already prepared to handle it.
- **Remote working** - includes the concept of "working from home or telecommuting" and working from other non-corporate locations through secured connections.
- **Multiple shifts** – makes alternate space available to greater number of staff by dividing staff into two shifts (e.g., morning and evening).
- **Buddy up** - makes use of existing in-company accommodation such as a training facility or lunch rooms to provide recovery space or increasing the office density.
- **Off-loading** – consists of off-loading additional critical tasks to staff at available sites or staff cross-trained to perform that function. .
- **Displacement** - involves displacing workspace used by staff performing less urgent business processes with staff performing a higher priority activity.

A "do nothing" strategy may be acceptable for certain non-urgent functions identified in the business impact assessment.

## Business Continuity Program Development Standards

To help ensure consistency and effectiveness, the business continuity plans are developed using standard tools and templates. The following provides a high-level description of each of the sections contained within the individual business continuity plans:

*Plan Intro, Plan Overview and Plan Scenarios*

- Standards for document use, intended audience, plan availability and distribution.
- Life-cycle maintenance, review and updated procedures and budget guidelines.
- Plan Scenarios used in writing the plan and internal and external communication standards

*Business Recovery Overview*

- Business overview, plan objectives, regulatory timeframes, performance guarantees, service level agreements
- Defines the recovery checklist, chain of events, critical tasks and detailed steps that need to be taken to stabilize operations in survival-mode and restore the business function processes in order of their criticality.
- Establishes the process for plan evaluation and defines the detailed steps for evaluating the business continuity plan performance to learn from the experience and enhance our business function preparedness and capabilities to respond and recover more effectively and efficiently.

Remaining BC Plan Sections

- *Process Details* – Provides key impact metrics utilized during prioritization analysis
- *Worst Case Scenario/Recovery Strategies* - Uses the results of the business impact analysis to define the business process criticality and prioritization, recovery time objectives, and overall business function recovery strategy. Defines the recovery analysis for loss of critical facility, loss of critical resources, loss of critical system and loss of critical vendor.
- *Segment Interdependencies* – Defines the business function's critical dependencies on other UnitedHealth Group business functions/processes
- *Critical Applications* – Defines the business function's critical dependencies on UnitedHealth Group systems/applications
- *Recovery Teams* – Identifies team members with responsibility to execute and coordinate recovery activities defined in the BC Plan.
- *Employee Rosters* – Identifies additional team members outside of the recovery team who assist with recovery activities. Rosters also provide a list of individuals with emergency contact information to be notified of an event.
- *Locations* – Defines the main locations, alternate recovery and command center locations used by the business operations
- *Critical Customers, Regulators and Other Third Parties* – Identifies the critical external stakeholders and/or communication process to be used at the time of the event.
- *Critical Vendors* – Identifies the critical vendors and/or suppliers the business requires to sustain operations
- *Critical Resources* – Defines the business function's minimum equipment configuration needed to sustain operations
- *Essential Records* – Defines the specific essential records stored offsite, as well as their storage location and contact information to use to retrieve them during a disaster.

# Lifecycle Maintenance

## Change Management and Update Process

Change is inevitable in any organization. Applications, infrastructure, function alignments, customer, vendors, site and contacts must continually be monitored and updated. In order to maintain an effective Program, business continuity plans are updated a minimum of twice annually and monitored for compliance by the Enterprise Resiliency & Response office.

## Metrics and Measurements

The Program metrics and reporting provide status and information necessary to manage current and future efforts. Key performance indicators are used to derive the "health" of the business continuity plans. Annually, each segment is required to provide executive sign-off on the certification of the plans. This reporting is delivered and reviewed by the Program Steering Committee and the Executive Sponsor to help ensure compliance with the Program strategy.

## Testing and Certification

The business continuity plans must be tested at a minimum annually through a variety of exercises formats, using scenarios that vary annually. Exercises may include structured walk-throughs, call tree validation, tabletop event simulation, and large or full-scale simulations. The Program uses an exercise roadmap to track what scenarios have been exercised in the past to ensure each exercise introduces a new situation that challenges the recovery team.

A formal test exercise report, identifying any gaps, issues and/or enhancements identified through testing, is published and monitored for remediation. When the remediation plan is complete, the plan is certified by the appropriate Executive Leadership. This certification process is monitored by the Program Steering Committee.

# Section V - Disaster Recovery Planning

## Disaster Recovery Objectives

UnitedHealth Group relies on a diverse array of interconnected information systems to meet the needs of its clients. The goal of disaster recovery (DR) planning is to protect the organization in the event that all or key aspects of UnitedHealth Group operations are rendered unusable. Preparedness is the key. The company has instituted an Enterprise Disaster Recovery Program (the Program) to first eliminate or reduce disaster risk in critical technology areas, and then plan for facilitation and the timely and predictable restoration of key applications, data, and supporting critical infrastructure.

The mission of the Program is to minimize the aggregate risk and impact to UnitedHealth Group from the occurrence of disaster events, focused on the overall viability of UnitedHealth Group to survive an event.

Following are the objectives of the Program that are in support of the mission:
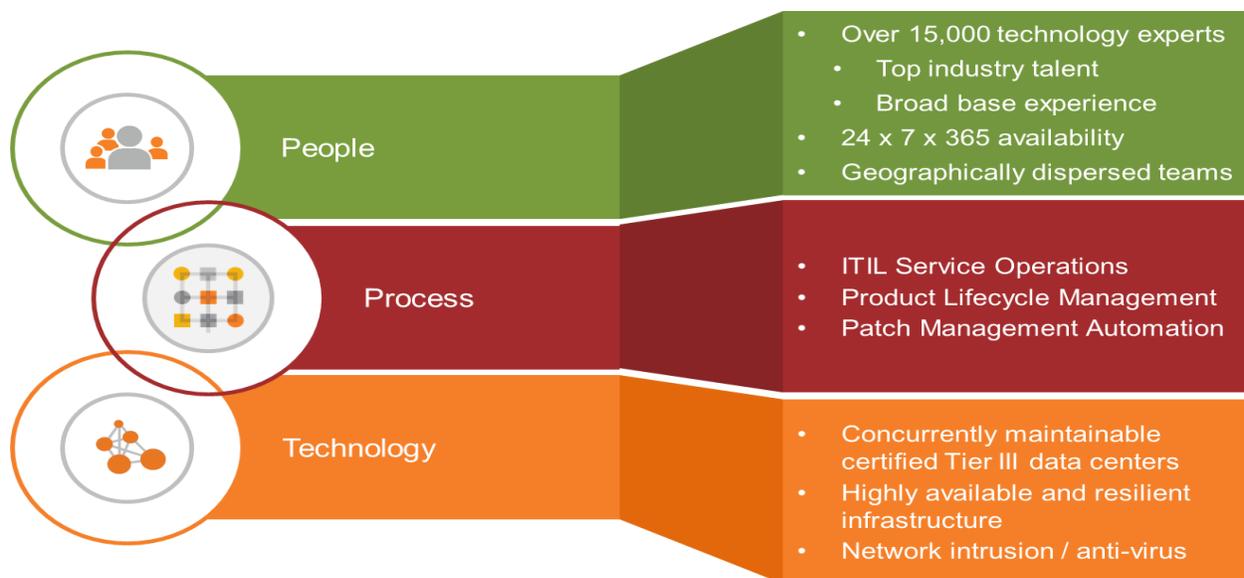- Provide a "systems solution" that accommodates the interdependencies between business processes and applications (i.e., recover the entire business transaction)
- Drive systemic and measurable improvements in DR capability (e.g., business process Recovery Time Objective (RTO))
- Recognizing funding and time constraints, evolve and improve the DR capability in a manner that provides greatest good for greatest number
- Establish DR requirements as part of UnitedHealth Group's systems architecture, delivery and operations as opposed to an after-thought once a new application goes into production
- Develop and deploy a modular, adaptive set of capabilities rather than one size fits all
- Deal with the most probable DR scenarios in addition to worst case "smoking hole"
- In addition to protecting UnitedHealth Group's on-going viability, make the DR capability a competitive strength that can be leveraged in the market.

## Disaster Recovery Strategies

UnitedHealth Group's approach to DR is based on the two fundamentals: Prevention and Protection. A focus on balancing the combination of disaster prevention and protection results in reducing both the probability and impact of a disaster. The Program first eliminates or reduces disaster risk in critical areas, and then plans for the most probable disaster scenarios.

# Prevention

For many companies, disaster recovery means minimizing downtime as they try to restore systems and get them back online. Our strategy includes focusing on items that would assist in preventing a disaster from taking down systems in the first place. The corporation has invested in creating an effective combination of people, process and technology that provides the fundamentals for a proven production method resulting in a stable, scalable environment for our applications to perform at operational excellence. This investment creates the "prevention" which is fundamental to the Program. Prevention is the proactive remediation of known technology exposures. Prevention includes removing the "accidents just waiting to happen".

**People**
- Over 15,000 technology experts
  - Top industry talent
  - Broad base experience
- 24 x 7 x 365 availability
- Geographically dispersed teams

**Process**
- ITIL Service Operations
- Product Lifecycle Management
- Patch Management Automation

**Technology**
- Concurrently maintainable certified Tier III data centers
- Highly available and resilient infrastructure
- Network intrusion / anti-virus

# Protection

Completely avoiding a technology disaster is impossible. However, the Program is based on anticipating and planning for the common types of disasters and designing solutions to address them. Disaster Protection addresses recovery from the most probable disaster scenarios and a worst case "smoking hole" scenario.

The EDR Program utilizes a variety of recovery strategies which align to the defined criticality of the application. Business critical applications, as defined by the Business Impact Analysis (BIA) and subsequent Business Continuity Plan (BCP), are given the highest priority and generally have a 72 hour or less Recovery Time Objective (RTO).

Highlights of the disaster recovery protection components include:

- Our data centers can operate in a "Lights out" mode for up to 3 days. If the Data Center continues to get fuel to run the generators, they are designed to run in this mode indefinitely.
- Operational backups are designed to use high performance disk-to-disk primary copy with physical offsite second copy to virtual tape libraries.

- DR Active and DR Standby recovery solutions employ Active-Active and/or Active-Standby components located in two geographically separate data centers where either site can fully support the production application in the event of a disaster with minimal manual intervention.
- Native Database replication technologies can be utilized depending on the related database technology in either an Active-Standby or Active-Active methodology.
- Mainframe SAN Replication recovery solution employs full asynchronous data replication between the production mainframe and a geographically dispersed hot standby DR mainframe.
- Distributed SAN Replication recovery solution employs full asynchronous data replication of production storage pools for distributed systems (UNIX and Wintel) and failover of production processing to geographically dispersed non-production systems for processing.
- Array Replicated storage in the Virtual server environment utilizes VMware Site Recovery Manager (SRM) to replicate entire Virtual Machine (VM) through full asynchronous SAN replication to an alternate data center with Virtual recovery to available capacity.
- Some distributed systems employ a recovery solution with failover of production to geographically separate non-production systems utilizing virtual tape or tape data restoration.
- Each critical application has a DR Plan that is refreshed at least once each year and tested annually.
- Metrics in the form of Key Risk Indicators (KRIs) are used to derive the "health" of the EDR program.

Our enterprise DR strategy involves identifying critical business processes and transitioning these critical applications, data, and supporting infrastructure to an alternate recovery location in a timely manner, thereby reducing the impact of a technology event to our critical business clients.

## Lifecycle Maintenance

Existing DR Plans follow standard lifecycle maintenance and are refreshed at least annually and as changes occur.  It is the responsibility of Application Owners and the Enterprise DR Team to ensure Plans are reviewed to identify:

- Equipment updates
- Employee changes (resignations and terminations)
- Changes in business requirements not reflected in specific plans
- Third party preparedness to validate against contractual obligations
- Inaccurate assumptions or oversights

Application DR Plans are approved and certified annually by the appropriate Application Owner with the organization.  Failure to complete a new DR Plan on time or complete an annual update of a DR Plan requires that a policy exception be submitted in Optum's Enterprise Governance Risk Compliance system (EGRC) by the Application Owner.

# Section VI – Public Health and Pandemic Planning

## Objectives

As a health and well-being company, we believe it is critical to plan for  events that impact  public health, including pandemics and the potential impact to our customers, members, providers and our own operations.  Natural disasters such as hurricanes, wild fires and pandemics can expand very quickly and

arrive with little or no warning; therefore companies need to be vigilant and prepared. We recognize the need to provide ongoing access to health care for our members and customers who may be impacted by these events. Pandemics can spread very quickly, so understanding what we need to address in advance, and being prepared to readily implement these actions will help sustain our operations and minimize impact to our customers during a pandemic or other public health event. .

UnitedHealth Group plans for such public health events within the Enterprise Resiliency & Response Program to ensure the availability of critical services for our customers. Individual business continuity plans require planning for a loss of 50% of personnel, loss of facilities, critical vendors and loss of or disruption to our technology. The event management plan provides the command and control structure to ensure effective monitoring, communication and decision making during the emergency. Information technology disaster recovery plans are in place to manage any impact to technology infrastructure and applications that could negatively affect our ability to serve customers, physicians, members, and others. As a national company with vast local resources, we have geographically dispersed computing, customer service facilities and health care networks that can support and supplement the work of compromised localities.

Where a pandemic involves a virulent strain, we may experience a surge in the need for our services, but may simultaneously see a reduction in our ability to provide these services. Therefore, pre-planning is critical to address any adverse impact to our services and systems from anticipated demands. During a pandemic, health services access will likely be altered from the services that are provided now. For example, demand for elective medical and surgical procedures will probably decrease; demand for acute care services in emergency departments and hospitals will likely increase. Public health officials will have the responsibility of triaging and prioritizing where, when and how health services will be provided.

We will work in collaboration with local and state health department officials to disseminate information on the availability of health services and will adhere to the public health direction on prioritization efforts for the provision of such services during public health emergencies. We will use our communication vehicles, including print and electronic media, to make information on provisions and availability of services widely accessible to our members, as well as members of the broader community where we operate.

We are committed to providing our customers, physicians who contract with us, members and others with timely clinical information. We will work to ensure that benefit designs and their interpretation will facilitate socially and medically appropriate access to clinical care, medical supplies, vaccines and pharmaceuticals. For example, we will assure that quantity limits for antiviral medications used to prevent and treat influenza are consistent with recommendations of the Centers for Disease Control and Prevention (CDC).

# Clinical Resources

With over 85,000 physicians, nurses, and clinical practitioners directly on our staff, we have the national and local resources to respond quickly and effectively during a public health crisis. The event management team serves as the vehicle to provide our customers with timely clinical information based upon CDC guidance, expert health professionals' input, and our real-time experience in serving more than 141 million people globally. This team is also responsible for reviewing and providing any information that is relevant to changes in UnitedHealth Group policies and procedures that may affect customers, members and clinical partners.

We can support federal, state, and local health department disease surveillance activities to identify and track disease outbreaks through data on emergency room usage, visits to physicians for a particular illness, and the filling of prescriptions.

As we have seen during the COVID-19 event, H1N1 pandemic, major hurricanes, flooding and wild fires, health services access may be altered in a public health crisis from the services that are provided during normal times. Public health officials will have the responsibility of triaging and prioritizing where, when

and how health services will be provided. Epidemiologically-based decisions will be made to provide critical services in appropriate places. For example, depending on the severity of the situation:

- Hospital care will probably be limited to those who are most critically ill from the pandemic and from other conditions. Services to those who are immunocompromised will not be provided in the same facilities as services for those who are critically ill with infection from a pandemic virus.

- Emergency medical services will be triaged by public health officials. We will work in collaboration with these agencies to ensure that our members, as well as all persons in the community, have access to appropriate health services. Non-pandemic-related medical care that is now delivered in the emergency room likely will be delivered in other settings

UnitedHealth Group's locally-based Market Medical Directors have established relationships with local health care providers, local medical societies, state medical licensure boards and state and local health departments. Regardless of the cause of the public health emergency, our medical directors work in collaboration with public health agencies to help ensure access to care in the event of a public health emergency. Relationships are also well-established with regulators and other government agencies, our customers, members and local community groups. Our medical directors work in collaboration with public health agencies and non-governmental organizations, such as the American Red Cross, to help ensure access to care for our members in the event of a disaster.

## Approach

UnitedHealth Group has established procedures for handling emergency management situations including: initial assessment of the severity of the situation; prioritization of actions needed to resolve the immediate care needs of our members; development of an action plan, which includes assigning resources for implementation; implementation of action plan, including continuous monitoring; documenting successful interventions; and validation of successful intervention.

Our Event Management Team monitors for impending disasters such as those caused by hurricanes and flooding and proactively mobilizes the appropriate planning and response resources to address the needs of our business, members and providers.

The Public Health Event Management Team assesses the risk and engages both enterprise-level executives and local Healthplan leadership to mobilize a complete response. Leaders engaged in the response may include Healthplan CEO's, Medical Directors, Provider Services, Member Services, Communication Specialists, Compliance Officers, and others as appropriate. The Public Health Event Management Team convenes to discuss the current situation and defines actions to be taken, resources to be deployed, and specific timeframes and touch points for monitoring to ensure continuous communication and care continuity for members and providers.

Each event is unique and our response is customized based on need and based on the services UnitedHealthcare provides to members in the impacted area. The following activities may be included as part of our overall efforts:

- Medical benefits may be temporarily modified to assist members preparing for, or responding to, the disaster in order to ease access to healthcare. These actions may include: removing prior authorization/notification requirements, allowing early refills of prescription medication, easing restrictions on use of out-of-network providers and providing early replacement of Durable Medical Equipment (DME).
- The Optum Crisis Counseling line may be made available to the community as a whole to provide mental health support to those who may need it. This service is free of charge and open to anyone impacted by the event.

- Our local clinical directors collaborate to identify members currently hospitalized or at long-term care facilities, evaluate the provider capacity within the geographic area, and where appropriate, identify reassignments and communicate this information to members and providers.

- Our Medical Directors review case management and disease management files to identify members at most risk due to disease severity or fragility. These members are a priority to contact to arrange for care continuity and determine if they need evacuation assistance.

- UnitedHealthcare and Optum's post-acute care patients are identified and our care managers ensure adequate supplies and prescriptions medication are available. In the event the member is to be evacuated, appropriate sites and resources are identified that will meet the transportation and ongoing needs of individual.

- We often provide financial support, both proactively to strengthen communities, and as part of our post-disaster community response.

- UnitedHealth Group employees and local leaders often participate in community recovery and rebuilding efforts as part of our social responsibility efforts to support the communities in which we work.

- Our compliance team proactively searches for any regulatory orders related to the event, such as state-level Executive Orders, Department of Insurance Orders or federal-level HHS or CMS orders, to ensure we are addressing all regulatory requirements.

# Section VII - Conclusion

In support of UnitedHealth Group's mission to help people live healthier lives and help the healthcare system work better for everyone, we are committed to providing vital services to our members and community during times of calm as well as crisis. The Enterprise Resiliency & Response Program, with the interrelated services of event management, site emergency planning, business continuity planning, disaster recovery planning, and response to events impacting public health and pandemics , are designed to ensure we can react quickly to all forms as disasters, minimizing potential negative impacts to our operations and vital services.

If additional information is required regarding any component of this program, please direct questions to your account executive team, or regulatory officer.