CMS Emergency Preparedness Rule:
Webinar Recording, Slides and Additional Information

Thank you to the 1,300 healthcare facilities that participated in our December 6 Hospital and Nursing Home webinars on the CMS Emergency Preparedness Rule. Below you will find links to the recorded webinars, the presentation handout, and links to access supporting information and tools. We will also be sending a short 10-question survey to solicit your feedback and to identify any specific needs or questions.

HOSPITAL SESSION

Link to Recorded Hospital Webinar

Link to Hospital Webinar Slides PDF

NURSING HOME SESSION

Link to Recorded Nursing Home Webinar

Link to Nursing Home Webinar Slides PDF

Clarifications based on Questions Received During and After the Webinars:

1. **Exercise/Drill Requirements**: Organizations that incur a true disaster event (an event that includes the activation of a Command Center and is formally documented as a disaster event, with an Improvement Plan), can utilize the event in place of 1 of the 2 required disaster exercises.

2. **November 15, 2016 CMS FAQ**: CMS has indicated that “If a facility needs a generator to meet the temperature requirement then it must provide the necessary level of generator with a capacity to run a HVAC system.”

   This is creating quite a stir. RPA is working with associations and our federal partners to review this statement. It was clearly not included in the Final EP Rule CFRs. Typically this type of situation enables inpatient healthcare facilities to come up with alternate plans for keeping staff/patients/visitors warm or cool (depending on the exterior temperatures) with the planning including a relocation or evacuation or patients when
the healthcare organization is unable to sustain appropriate building temperatures. Our recommendation is DON’T DO ANYTHING YET. MORE TO COME.

3. Q: What if our healthcare facility has multiple accreditation/licensure agencies?
   A: The final plan needs to be built to the most stringent code/standard/regulation/statute to ensure compliance.

4. Q: What date do we need to have the Hazard Vulnerability Assessment (HVA) completed by?
   A: The implementation date for the CMS EP Rule is November 15, 2017. There is no date required for completing your HVA. However, we highly recommend that the assessment be completed in early 2017 to enable the organization to address plan improvements, purchasing of equipment, training and exercising prior to November 2017.

5. Q: Can you provide the actual CMS Guideline?
   A: See below in the Links section.

6. Q: Does a Loss of Electronic Health Records count as a disaster exercise?
   A: This would likely count as a disaster exercise, as long as the healthcare organization activates their Command Center, tests multiple functions within the organization, and develops an After Action Report. This could potentially be considered a full scale exercise if conducted in conjunction with a healthcare coalition or multiple community partners. The organization could also consider tracking some patients throughout the facility both electronically and through downtime procedure documentation.

7. Q: Do Mutual Aid Plan disaster exercises count as one of our annual exercises?
   A: Yes. This is similar to what was noted above with the facility being required to activate a Command Center and invite emergency responders or other community agencies. The exercise participant must engage beyond just reporting its operational status. “Boots on the ground” activities needs to take place to test internal capabilities for surge capacity, resource deployment and evacuation depending on the scenario being utilized. The Mutual Aid Plans that and plan exercises that RPA coordinates will be evolving in 2017 to ensure that they meet the baseline accreditation, licensure and certification requirements.

Links


2. Federal Register: Medicare and Medicaid Programs; Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers

4. Assistant Secretary of Preparedness and Response (ASPR) TRACIE: Home page for EP resources

5. ASPR TRACIE – Guide that directs providers to available resources: Resources at Your Fingertips

6. Hazard Vulnerability Assessment (HVA): Tool Options

7. California Association of Health Facilities: SNF Emergency Preparedness Crosswalk

8. ASHE Resources: Implications of the CMS Emergency Preparedness Rule


Please feel free to reach out to Caitlin Casey at RPA (ccasey@phillipsllc.com / 860-793-8600) to discuss any support your facility or healthcare system may need for developing an updated HVA, designing full building evacuation and catastrophic surge plans, or implementing technology systems to enhance organizational response capabilities.

Best regards,

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