ROAD TO CMS EMERGENCY PREPAREDNESS REQUIREMENTS: HANDS ON HVA & EOP

CONNECT CONSULTING SERVICES, INC.

FEBRUARY 28, 2017

TRAINING AGENDA

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- HCPSC Welcome and Ice Breaker

- How to Conduct an Hazard Vulnerability Analysis (HVA)
  - How to use the HVA information to create your Emergency Operations Plan (EOP)

- Hands on HVA Technical Assistance Session

- Key elements of a robust Emergency Operations Plan
  - HRSA Program Information Notices 2007- 015 and FTCA Policy Manual
  - CMS Emergency Preparedness Requirements EOP Checklist

- EOP Technical Assistance

- Debrief and Next Steps

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- **Nora O'Brien**, MPA, CEM- CEO- CPCA staffer from 2001-2009, launched CCS in 2009 to assist clients with developing emergency management plans, training and drills and exercises

- **Cathy Larsen**, MA, Director of Planning and Development- former Executive Director of Southern Trinity Health Center and years of healthcare emergency management planning

- **Paul Small**, BA, EM, Emergency Management Planner- former U.S. Air Force Emergency Manager who has been stationed throughout the world planning and conducting exercises

- **Norma Springsteen**, BA, Director of Operations- years of coordinating projects for the Yolo County Department of Public Health and CAPG

CONNECT CONSULTING SERVICES, INC. PROJECT TEAM MEMBERS

CMS.gov
Centers for Medicare & Medicaid Services

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CMS EMERGENCY PREP REQUIREMENTS

- In 2016, the Centers for Medicare and Medicaid issued final Conditions of Participation (CoP) for 17 types of Medicaid and Medicare providers @ emergency management- FQHCs, RHCs, CMHA, IHS, hospice, LTCs, etc. by November 15, 2017

- Requirements will include:
  - Conduct Risk Assessment and Planning
  - Develop Policies and Procedures
  - Create Communication Plans
  - Training and Plan Testing

  CMS Emergency Preparedness Rule Overview

HCPSC CMS PROJECT OVERVIEW

- Offering a Health Center CMS Compliance Self- Assessment Tool- January

- Hosting monthly technical assistance calls to HCPSC members get to CMS Compliance – January to June

- Conduct an emergency management training geared to supporting HCPSC members seeking to meet the CMS emergency preparedness requirements- June 27

6   2017 CMS TECHNICAL ASSISTANCE SCHEDULE

- February 28, 11am- Emergency Plan policies and procedures development and update to meet the CMS requirements

- March 28, 11am- Communication plan development and update

- April 25, 11am- Emergency training process & documentation

- May 30, 11am- Preparing for tabletop and/or functional exercises

- June 13, 11am- Developing a full-scale exercise to test your emergency plans

- June 27- 9am-3pm- An in-person training on how to conduct a full-scale drill training with an exercise at a member health center

RISK ASSESSMENT

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- CMS Requirement: All FQHCs must identify risks and vulnerabilities via a Hazard Vulnerability Analysis process annually

- A Hazard Vulnerability Analysis (HVA) created by Kaiser HVA Tool pinpoints:
  - *Hazards* and/or *vulnerabilities* that need your attention;
  - *Actions* that might be taken to reduce the impact of those hazards;
  - What *resources* are likely to be needed to *mitigate* and *prepare* for hazards.

- Best practice tips: Conduct a HVA for each CHC site annually and ask neighboring healthcare provider for their HVA - same area, same hazards!

8 HAZARD VULNERABILITY ANALYSIS (HVA) WHAT????

- **Hazard Vulnerability Analysis (HVA):**
  - Process to help Clinics evaluate their vulnerability to *specific* hazards;
  - Puts *each* hazard in perspective by using categories:
    - *Probability* of the Hazard Occurring;
    - *Impact* of the Hazard;
      - Human Impact;
      - Property Impact;
      - Business Impact.
    - *Preparedness* of your organization;
    - Ability to *Response* to the Hazard:
      - Internal Response;
      - External Response.

9   HAZARD VULNERABILITY ANALYSIS (HVA) PURPOSE

- **Purpose of HVA is to Make Risk-Based Choices:**

  - Address your Vulnerabilities;

  - Mitigate Hazards;

  - Respond to Events;

  - Recover from Events;

  - Create an Emergency Operations and Business Continuity Plans to address greatest Risks.

10 HAZARD VULNERABILITY ANALYSIS (HVA)
PLANNING RESOURCE TOOL - KAISER PERMANENTE

Probability x Severity* = RISK

HAZARD AND VULNERABILITY ASSESSMENT TOOL
NATURALLY OCCURRING EVENTS

KAISER PERMANENTE.

EVENT	PROBABILITY	SEVERITY = (MAGNITUDE - MITIGATION)						RISK
		HUMAN IMPACT	PROPERTY IMPACT	BUSINESS IMPACT	PREPARED-NESS	INTERNAL RESPONSE	EXTERNAL RESPONSE	
	Likelihood this will occur	Possibility of death or injury	Physical losses and damages	Interuption of services	Preplanning	Time, effectivness, resouces	Community/ Mutual Aid staff and supplies	Relative threat*

* SEVERITY = Magnitude (Impact) – Mitigation (Preparedness + Response)

HAZARD VULNERABILITY ANALYSIS (HVA)
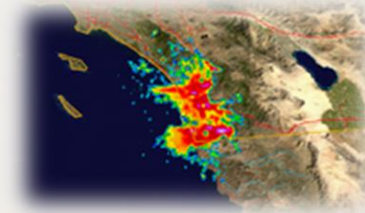## PLANNING RESOURCE TOOL - KAISER PERMANENTE

12   HAZARD VULNERABILITY ANALYSIS (HVA)
PLANNING RESOURCE TOOL - KAISER PERMANENTE

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HAZARD VULNERABILITY ANALYSIS (HVA) NATURAL HAZARDS

- Wild Fire
- Earthquake (> 5.0)
- Landslide
- Severe Thunderstorm
- Tidal Wave
- Flood, External

- Drought
- Snow Fall
- Blizzard
- Ice Storm
- Temperature Extremes
- Dam Inundation

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HAZARD VULNERABILITY ANALYSIS (HVA) TECHNOLOGICAL HAZARDS

- Information Systems Failure (> 4 hrs.)

- Communications Failure (> 4 hrs.)

- Fire, Internal (major)

- Electrical Failure

- Generator Failure

- Total Elevator Failure

- Water Failure

- Flood, Internal

- Fuel Shortage

- Sewer Failure

- Natural Gas Failure

- Fire Alarm Failure

- HVAC Failure

- Data Compromise

- Denial of Services (computer/network/website)

HAZARD VULNERABILITY ANALYSIS (HVA)
HUMAN HAZARDS

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- Epidemic/Pandemic
- Mass Casualty Incident (trauma)
- Violent Person
- Train Crash (at facility)
- Terrorism (CBERN)

- Bomb Threat
- Civil Disturbance
- Hostage Situation
- Labor Action

16 HAZARD VULNERABILITY ANALYSIS (HVA) SUMMARY

I have the HVA done, now what do I do with all this info?

Potential Disaster	Probability Rating	Average Impact Rating	Average Mitigation Rating	Brief Description of Potential Consequences & Mitigation Actions
Natural Hazards Probability: 1=Very Low to 3=High Impact: 1=Minor annoyance to 3 =Total destruction				
Technological Hazards Probability: 1=Very Low to 3=High Impact: 1=Minor annoyance to 3 =Total destruction				
Human Made Hazards Probability: 1=Very Low to 3=High Impact: 1=Minor annoyance to 3 =Total destruction				

HAZARD VULNERABILITY ANALYSIS (HVA)
Q&A

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18 KEYS TO A SUCCESSFUL EMERGENCY OPERATIONS PLAN (EOP)

- Hazard Vulnerability Assessment (HVA)

- Policies and Procedures (Annexes, Quick Reaction Checklists)

- Emergency Communications Plan (ECP)

- Training and Testing

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EOP
4 PHASES OF EMERGENCY MANAGEMENT

- Preparedness

- Response

- Recovery

- Mitigation

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EMERGENCY OPERATIONS PLAN (EOP)

- CMS Requirement: Must develop and maintain an all hazard plan based upon the risks and vulnerabilities raised in the HVA

  - Emergency Operations Plan (EOP) and Business Continuity Plan (BCP) that can guide your organization's response to both medical and non-medical disasters

  - Update EOP and BCP annually for each of your FQHC sites

  - EOP must include elements such as:

    - Incident Command System (ICS) to reflect who is in charge

    - Supplies and equipment to support effective disaster response and recovery

    - Making provisions for patient tracking and vulnerable populations health needs
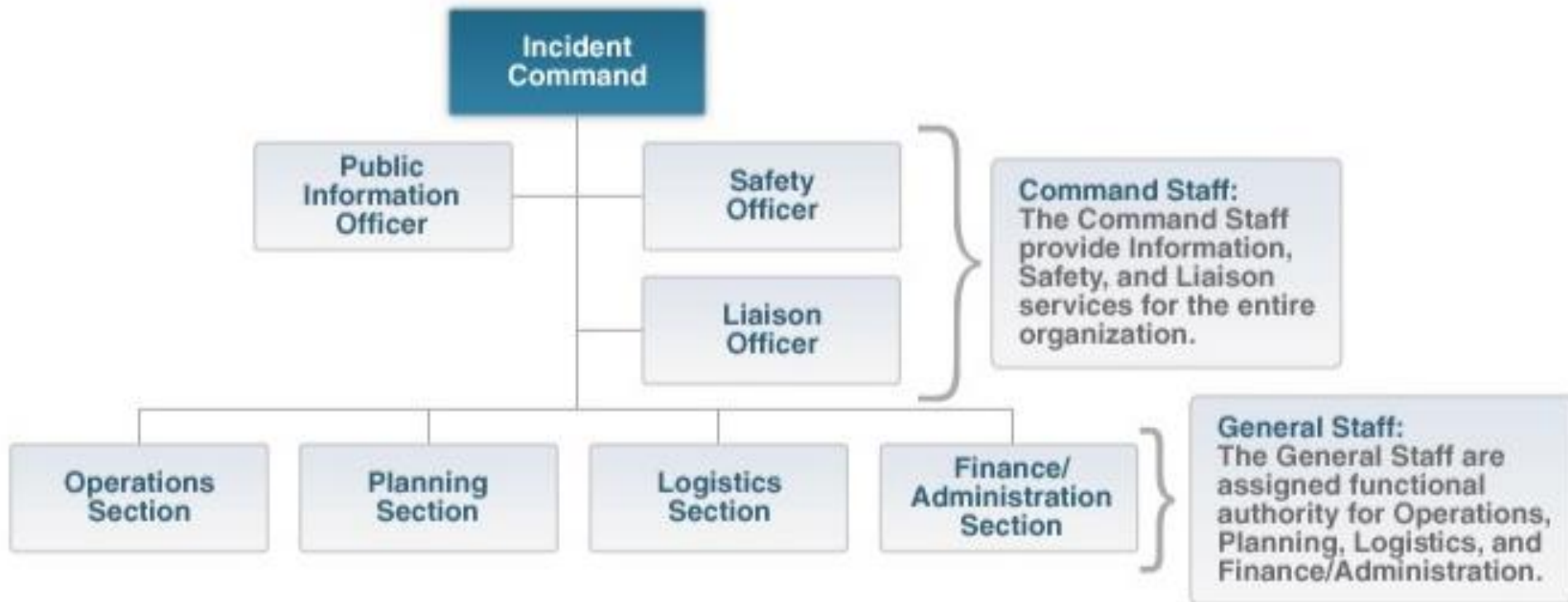
EOP CHECKLIST REVIEW

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- Industry Best Practices

- Review Annually

- Based on CMS Rule dated September 2016
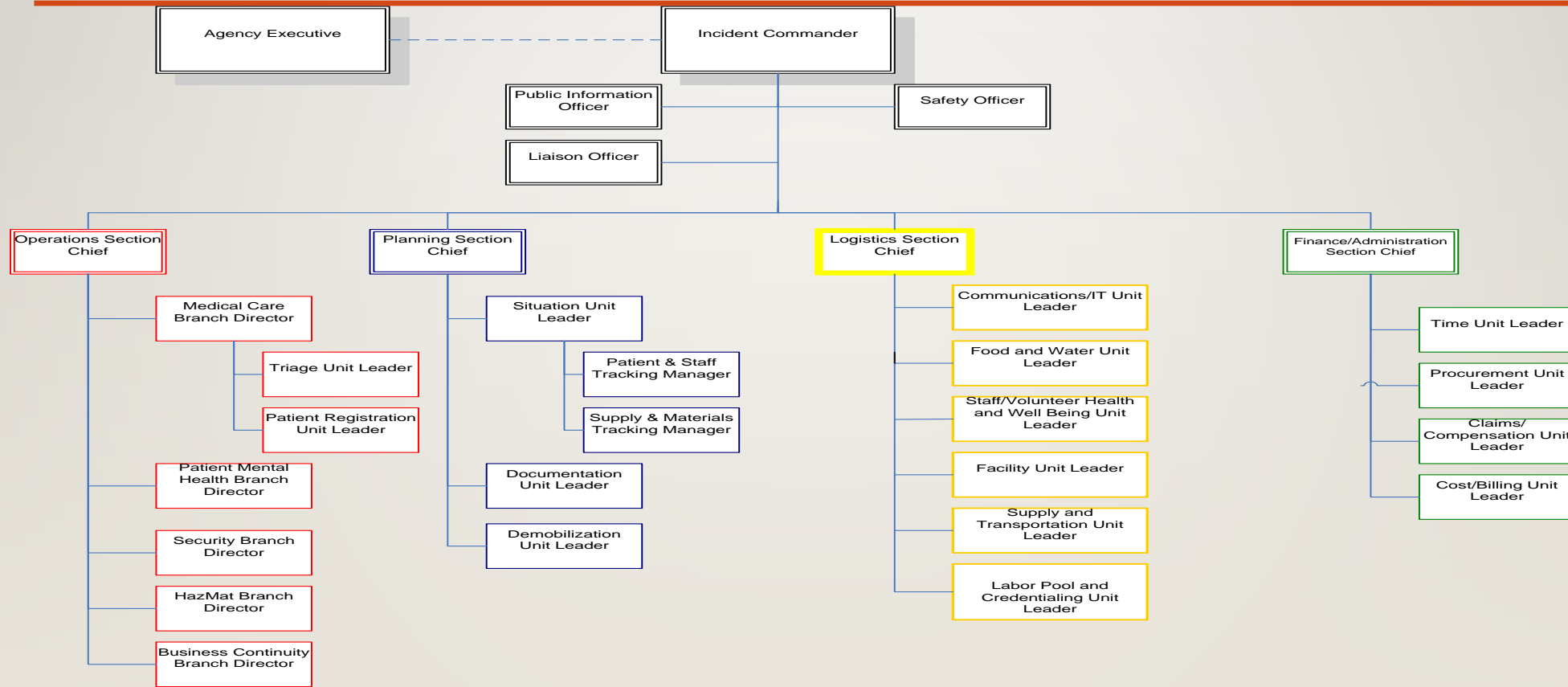
- CMS Interpretive Guidance TBD
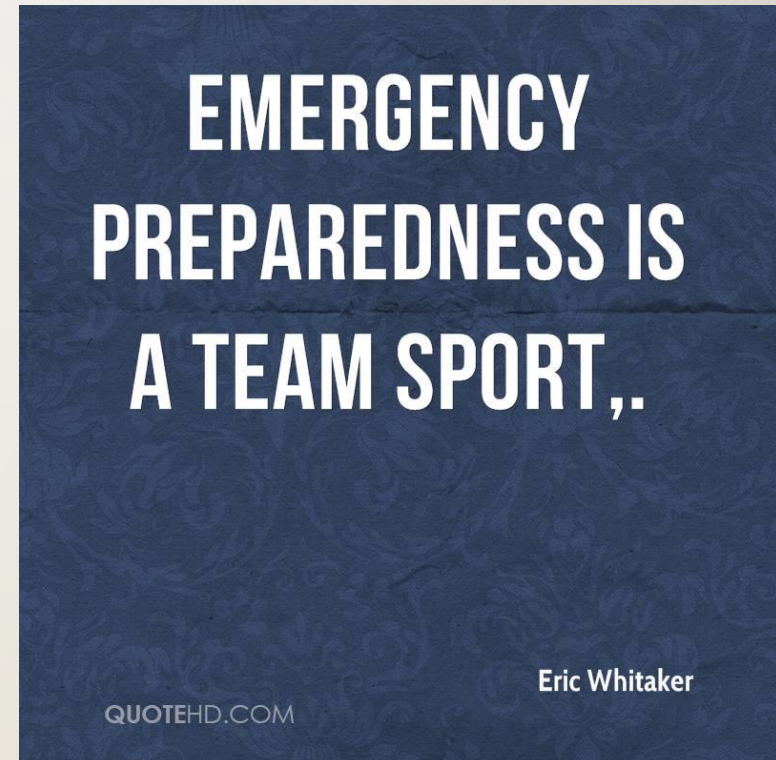
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INCIDENT COMMAND SYSTEM COMMAND & GENERAL STAFF

INCIDENT COMMAND SYSTEM

EMERGENCY COMMUNICATIONS PLAN

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- **CMS Requirement**: Must have internal and external communications plans & redundant communication systems

- **Internal**: Notify patients, staff, and Board of a disaster impacting the FQHC

- **External**: Notify external stakeholders such as federal, tribal. State, and local agencies

- **Redundant communications**: Have radios, satellite phones, ham radios, etc.

TRAINING AND PLAN TESTING

- CMS Requirement: FQHCs must conduct and document annual training and test plans with 2 exercises annually

- Training: Conduct and document annual training on your emergency preparedness policies and procedures to all staff, volunteers, and Board

- Exercises: Must conduct and document two exercises annually of EOP
  - One must be a full scale drill that can be a community or facility based exercise
  - The other exercise can be your choice can be a functional or tabletop exercise

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GOVERNMENT EMERGENCY TELECOM SERVICE (GETS)

- Provides national security and emergency preparedness personnel priority access and prioritized processing in local and long distance networks

- Intended use in emergency or crisis situation when landline network is congested

- No Cost to Subscribe

- https://www.dhs.gov/government-emergency-telecommunications-service-gets

- When applying for a GETS access users can also apply for Wireless Priority Service (WPS)

- WPS is similar to GETS the difference being WPS is for wireless networks

27 READY SAN DIEGO

San Diego County Emergency Resource App:

- Plan and Prepare;

- Emergency Disaster Info, Maps, Shelters;

- Recovery Resources, Assistance and Guidance

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MEMBER DISCUSSION

- What are your biggest take-aways about the CMS requirements?

- Which CMS EP Requirements most concern you?

- How can we best help you?

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TRAINING DEBRIEF AND NEXT STEPS

- Tell us what you liked about the training?

- What could we have done differently?

- <u>Project Next Steps</u>

- Monthly CMS EP requirement conference calls

- June 27th training on exercise design at a health center

OFFERS OF SUPPORT

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- As a member of HCPSC, Connect Consulting Services will offer a free 30 minute phone consultation regarding your CMS compliance needs.

- In addition, Connect Consulting Services will offer a 15% discount on our planning, training, and exercise services.

- Please contact Norma Springsteen at Norma@ConnectConsulting.biz to schedule a call with us to see how we can help your FQHC

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CONTACT US!

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