



**CMS.gov**  
Centers for Medicare & Medicaid Services

# Road to CMS EP Compliance:

## Training and Training Planning



# Training Agenda

- ▶ HCPSC Welcome and Overview
- ▶ CMS Training Requirements
- ▶ Who you need to train
- ▶ How to document your training
- ▶ Next Steps

- ▶ **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
- ▶ **Alisha King, CEM, MEPP Director of Training and Exercises**, years of public health and local government training and exercises
- ▶ **Norma Springsteen, BA, Director of Operations**- years of coordinating projects for the Yolo County Department of Public Health and CAPG
- ▶ **Rich Wakeman, B.A. Accounting Manager**- years of technical support and accounting
- ▶ **Kristina Freas, RN, MHS, CEM, DK Freas LLC**, Advisor, Healthcare SME Expert -

## Connect Consulting Services, Inc. Project Team Members



Centers for Medicare & Medicaid Services

## 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 16, 2017](#)
- ▶ Requirements will include:
  - ▶ Conduct [Risk Assessment](#) and Planning
  - ▶ Develop [Policies](#) and [Procedures](#)
  - ▶ Create [Communication Plan](#)
  - ▶ Training and Plan Testing

### CMS Emergency Preparedness Rule Overview



#### FEDERAL REGISTER

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Part II

Department of Health and Human Services

Centers for Medicare & Medicaid Services  
42 CFR Parts 403, 416, 418, et al.  
Medicare and Medicaid Programs; Emergency Preparedness Requirements  
for Medicare and Medicaid Participating Providers and Suppliers; Final  
Rule



- ▶ CMS makes assumptions that all FQHCs are training staff on emergency plans based upon the [HRSA 2007-015 PIN](#)
  - ▶ Health centers should provide ongoing training on emergency management and the implementation of the EMP to employees at all levels of the organization. The FQHC/RHC must train their staff on the emergency policies and procedures annually
- ▶ **CMS Section 491.12(d)** will require RHCs/ FQHCs to develop and maintain emergency preparedness training and testing programs and review and update these programs at least annually

# Benefits of Training, Disaster Drills and Exercises to your FQHC

- ▶ Meet CMS Compliance
- ▶ Test all or part of your existing plans
- ▶ Staff gets to practice your emergency policies and procedures w/o the stress of an actual disaster
- ▶ Highlights deficiencies in your plans that you can correct by implementing your improvement plan
- ▶ Planning for the drill or exercise will be another opportunity to review your existing plan

# Training and Exercise Benefits to Your Community

- ▶ Meet CMS Compliance
- ▶ Determine your response coordination and logistics with your healthcare partners pre-event
- ▶ Clarifies the response roles all the partners will play
- ▶ Maintain/strengthen relationships with disaster planning partners- hospitals, PH, public safety agencies, CBOs
- ▶ Learn local and state emergency management protocol and procedures- i.e., resource requesting

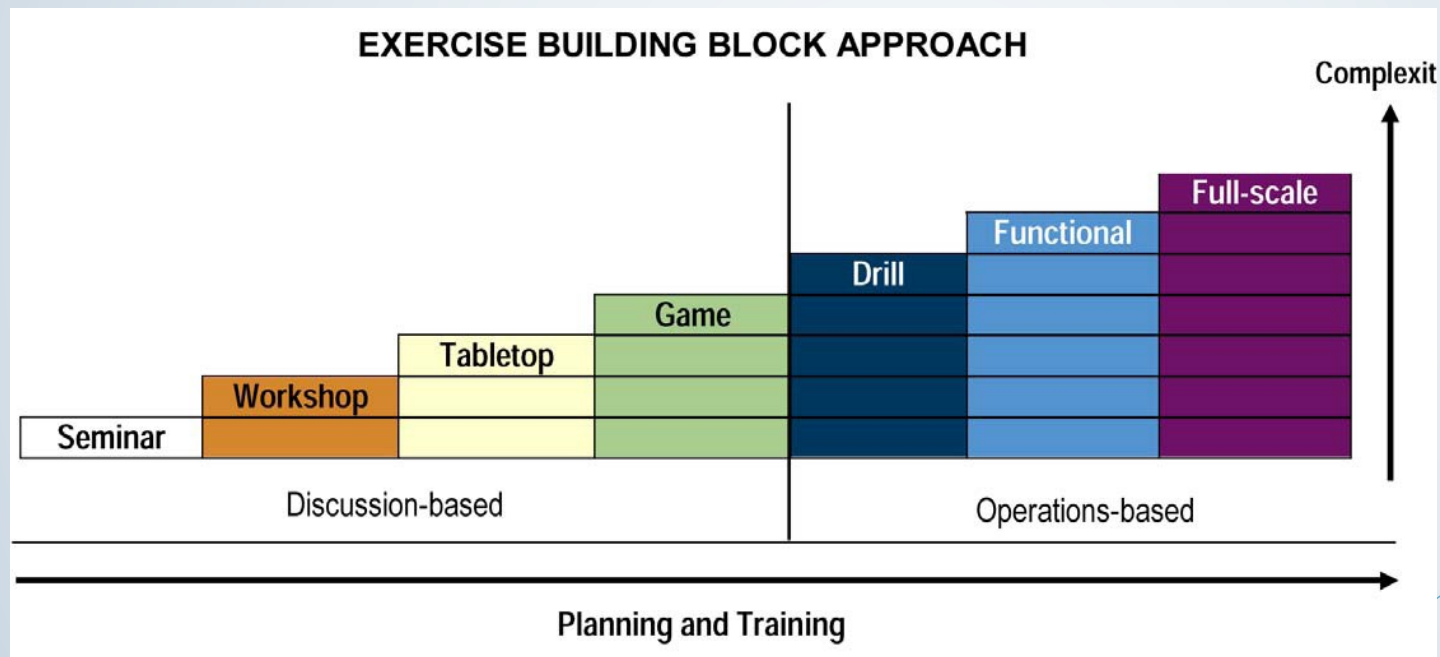


# CMS Requirement: Whom You Need to Train

- ▶ Section 491.12(d)(1) will require each RHC and FQHC to annually:
  - ▶ Provide initial training in emergency preparedness policies and procedures to all **new and existing staff**
  - ▶ Individuals providing services under arrangement (**contractors**)
  - ▶ **Volunteers**, consistent with their expected EM roles
  - ▶ Maintain **documentation** of that training. Each RHC and FQHC will also have to ensure that its staff could **demonstrate knowledge of those emergency procedures.**



# Drills and Exercise Types



# Training Topics and Documentation

- ▶ What do we train our staff, contractors and volunteers?
  - ▶ Incident Command System
  - ▶ Evacuation procedures and shelter in place procedures
  - ▶ Incident Action Planning
  - ▶ Business continuity plan
  - ▶ Disaster Drills and Exercises
- ▶ When do we train our staff, contractors and volunteers?
  - ▶ New staff orientation
  - ▶ Annually
- ▶ How do we document our training?
  - ▶ Sign in sheets, training certificates
  - ▶ Waiting on the CMS Interpretative Guidance for documentation requirements
  - ▶ After Action Report



# Developing a Training/Exercise Plan

Training/Drill	Timeline	Task
Drill	Monthly	Communication systems- radios
Drill	Quarterly	Staff notification
Functional/Tabletop Exercise	Annually- alternate every 6 months with FE	Emergency or business continuity plan
All Staff Training	Annually	Emergency procedures
Full Scale Exercise	Annually	Facility, Community, regional, state exercise



## COASTAL WARRIOR San Diego County Multidisciplinary / Multi-jurisdictional Full-Scale Exercise June 8, 2017



- ▶ If your FQHC would like to participate in San Diego County's Full Scale Exercise Coastal Warrior on June 8<sup>th</sup>, please contact If you could please complete the forms and send **Friday April 28, 2017** we would appreciate it. As previously discussed facilities objectives should be focused on/around the following key objective items:
- ▶ Incident Command Center (HCC) Activation
- ▶ Communications
- ▶ Security
- ▶ Cybersecurity
- ▶ Family Reunifications
- ▶ **Patrick Buttron**, EMS Coordinator, EMT, TLO  
Public Health Preparedness and Response (PHPR) Branch, County of San Diego Health & Human Services Agency [Patrick.Buttron@sdcounty.ca.gov](mailto:Patrick.Buttron@sdcounty.ca.gov)

# Resources and Upcoming Trainings

- ▶ Free Riverside County Preparedness Summit- Reach Beyond Recovery-Workshop April 26<sup>th</sup>-  
<http://www.rivcoemd.org/Programs>
- ▶ Free CMS MLN Webinar April 27<sup>th</sup>- Emergency Preparedness Requirements Final Rule Webinar Re Training & Exercise Requirements  
<https://blh.ier.intercall.com/details/3fffe92ff39341f4935586d18895c3d3> - limited availability
- ▶ <http://hcpsocal.org/emergencypreparedness2017> all slides, webinars, tools and templates from the calls and trainings
- ▶ HHS Assistant Secretary for Preparedness and Response (ASPR) Technical Resources, Assistance Center, and Information Exchange (TRACIE) <https://asprtracie.hhs.gov/>

# Training Debrief and Next Steps

- ▶ Tell us what you liked about the training?
- ▶ What could we have done differently?
- ▶ Project Next Steps
- ▶ Where are We?? - Check-In?
- ▶ **Monthly** CMS EP requirement conference calls
- ▶ **June 27<sup>th</sup> training** on exercise design at a health center



# 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 23, 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

## Additional Support

- ▶ 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](mailto:Norma@ConnectConsulting.biz) to schedule a call with us to see how we can help your FQHC





## Contact Us!



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