



HEALTH CENTER
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of Southern California

CMS.gov
Centers for Medicare & Medicaid Services

Centers for Medicare & Medicaid Services Emergency Preparedness Requirements

CMS Emergency Preparedness Compliance
Technical Assistance Call- #1
Assessing Your FQHC's Risks and CMS EP Readiness

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Technical Assistance Call Agenda

- ▶ Welcome - Jill Webber, HCPSC
- ▶ Center for Medicare and Medicaid Services (CMS) Project Overview
- ▶ CMS Emergency Preparedness Requirement Review
- ▶ Assessing your FQHCs' risks with a Hazard Vulnerability Analysis (HVA)
- ▶ Assessing your CMS Emergency Preparedness Compliance Readiness
- ▶ Q & A

Why Plan for Disasters?

- ▶ According to the Federal Emergency Management Agency (FEMA), more than 40% of businesses never reopen after a disaster, and for those that do, only 29% were still operating after two years.
- ▶ Those businesses that lost their information technology for nine days or more after a disaster? Bankruptcy within a year.
- ▶ Not good odds for any business or government agency

HCPSC CMS Project Overview

- ▶ Offering a Health Center CMS Compliance Self- Assessment tool
- ▶ Hosting monthly technical assistance calls to HCPSC members get to CMS Compliance
- ▶ Conduct an emergency management training geared to supporting HCPSC members seeking to meet the CMS emergency preparedness requirements



HCPSC CMS EP TA Call #1- Risks & Readiness



1/24/2017

2017 CMS Technical Assistance Schedule

- ▶ **January 24, 11am-** CMS Requirement Review, Hazard Vulnerability Assessments and CMS Emergency Preparedness Self- Assessment
- ▶ **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

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, hospitals, hospice, LTCs, etc.
- ▶ Requirements will include:
 - ▶ Conduct Risk Assessment and Planning
 - ▶ Develop Policies and Procedures
 - ▶ Create Communication Plans
 - ▶ Training and Plan Testing



CMS Emergency Preparedness Rule Overview



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Discussion

- ▶ What are your biggest take-aways about the CMS requirements so far?
- ▶ Which CMS EP Requirements most concern you?

Hazard Vulnerability Analysis (HVA)

- ▶ A Hazard Vulnerability Analysis (HVA) pinpoints the hazards and/or vulnerabilities that need your special attention, the actions that might be taken to reduce the impact of those hazards, and what resources are likely to be needed to mitigate and prepare for hazards
- ▶ Uses a mathematical formula to assess a hazard such as wildfire against the probability it will likely happen to your business- higher the # the greater the likelihood it can impact your FQHC
- ▶ San Diego County modified the Kaiser Permanente HVA formula filled Excel formatted tool- [Kaiser HVA Tool](#)

HVA Screenshot

HAZARD VULNERABILITY ASSESSMENT TOOL HUMAN RELATED EVENTS

EVENT	PROBABILITY	SEVERITY = (MAGNITUDE - MITIGATION)						RISK
		HUMAN IMPACT	PROPERTY IMPACT	BUSINESS IMPACT	PREPARED-NESS	INTERNAL RESPONSE	EXTERNAL RESPONSE	
	<i>Likelihood this will occur</i>	<i>Possibility of death or injury</i>	<i>Physical losses and damages</i>	<i>Interruption of services</i>	<i>Preplanning</i>	<i>Time, effectiveness, resources</i>	<i>Community/ Mutual Aid staff and supplies</i>	<i>Relative threat*</i>
SCORE	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 - 100%
Epidemic/Pandemic								0%
Mass Casualty Incident (trauma)								0%
Violent Person								0%
Train Crash (at facility)								0%
Terrorism (CBERN)								0%
Bomb Threat								0%
Civil Disturbance								0%
Hostage Situation								0%
Labor Action								0%
AVERAGE	0.00	0.00	0.00	0.00		0.00	0.00	0%

*Threat increases with percentage.

RISK = PROBABILITY * SEVERITY		
0.00	0.00	0.00

HVA Tips

- ▶ Ask your healthcare planning partners and county office of emergency services for their HVA- same region, same hazards
- ▶ Conduct a HVA for every clinic site- possible different internal and external hazards and threats
- ▶ Review FQHC safety reports to highlight internal hazards such as IT, power or sewer failures
- ▶ Update an HVA after major business process updates such as adding new office sites or an upgraded computer system

CMS EM Compliance Readiness Self Assessment Tool

- ▶ Assign a value between 5 - 0 to determine your CMS compliance readiness level with 5 being most complete and 0 not complete at all.
- ▶ The scoring rubric will identify your emergency planning, training, and exercise gaps.
- ▶ Designed for you to assess your FQHC's:
 - ▶ Emergency Planning gaps
 - ▶ Communication Planning gaps
 - ▶ Training and Testing gaps

CMS EP Self Assessment Tool



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CMS Emergency Preparedness Compliance Self-Assessment Tool

By completing this Self-Assessment Tool, it will allow you to determine how your organization can meet the Centers for Medicare and Medicaid (CMS) emergency preparedness requirements. The scoring rubric will also identify your emergency planning, training, and exercise gaps.

To answer the questions below, please assign a value between 5-0 to determine your CMS compliance readiness level with 5 being most complete and 0 not complete at all.

CMS Emergency Preparedness Requirement Element	Score 5-0	Notes
Emergency Plan Requirements		
Do you have staff assigned to keep the emergency management program current that represents each of your Health Center's (HC) departments such as administration and clinical?		
Have you identified internal and external risks to your organization by completing a Hazard Vulnerability Assessment (HVA) for each of your practice sites?		
Does your organization have an all hazards emergency Operations Plan (EOP) for each of your practice sites that can guide your disaster response process for both medical and non-medical disasters?		
Does your HC have a business continuity plan (BCP) to address continuity of patient care?		
Does your EOP contain orders of succession? (If decision makers are unavailable, who is in charge?) with an Incident Command System (ICS)?		
Do you review and update EOP and BCP plans annually based upon risks identified in the HVA?		
Do you review and update the HVA annually?		
Do your plans address cyber security for all HC patient and operations data?		
Emergency Plan Requirement Section Subtotal		
Communications Plan Requirements		
Does your HC have a communication plan with policies and procedures for communicating with internal stakeholders such as patients, Board, and staff?		

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CMS Self Assessment Scoring Rubric

- ▶ Conduct this self assessment with your FQHC safety committee and leadership?
 - ▶ **115- 80-** You are on your way to CMS compliance! You most likely answered 4 or 5s for most questions
 - ▶ **79- 50-** There are gaps in your emergency management program- you answered 4s and 3s
 - ▶ **49- 22-** You have a long way to go to get to CMS compliance - you answered 2s and 1s
 - ▶ **21-0** - You are just getting started



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Discussion

- ▶ Have you conducted an HVA before?
- ▶ Which CMS EP Requirements are you unclear about?

Offers of 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 to schedule a call with us to see how we can help your FQHC



Contact Us!



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