

Road to CMS EP Compliance:

Exercise Terms, Concepts & CMS Interpretative Guidance

Connect Consulting Services, Inc.

June 13, 2017



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Engage | Prepare | Recover



Training Agenda

- ▶ HCP Welcome and Overview
- ▶ Disaster Exercise Terms and Concepts
- ▶ CMS Interpretative Guidance
- ▶ Questions?
- ▶ Next Steps...



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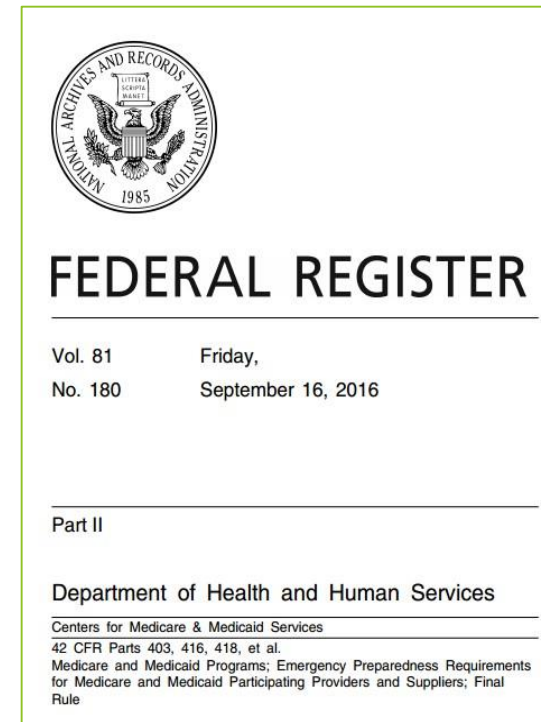


- ▶ Nora O'Brien, MPA, CEM, Chief Executive Officer
 - ❖ CPCA Staffer from 2001-2009, launched CCS in 2009 to assist clients with developing emergency management plans, training and drills and exercises
- ▶ Cathy Larsen, MA, Director of Planning and Development
 - ❖ Former Executive Director of Southern Trinity Health Center and years of healthcare emergency management planning
- ▶ Karen Garrison, B.A. Aging Services Advisor,
 - ❖ 20+ years of working as an aging services provider and program design and delivery
- ▶ Norma Springsteen, BA, Director of Operations
 - ❖ Previous experience coordinating projects for the Yolo County Department of Public Health and CAPG

CMS Emergency Prep Requirements

- ▶ In September 2016, the Centers for Medicare and Medicaid Services (CMS) issued final Conditions of Participation (CoP) for 17 types of Medicaid and Medicare providers, including FQHCs and RHCs. Must meet compliance by: **November 15, 2017**
- ▶ Requirements include:
 - ✓ ~~Conduct Risk Assessment and Planning~~
 - ✓ ~~Develop Policies and Procedures~~
 - ✓ ~~Create Communication Plan~~
 - ➔ **Training and Plan Testing**

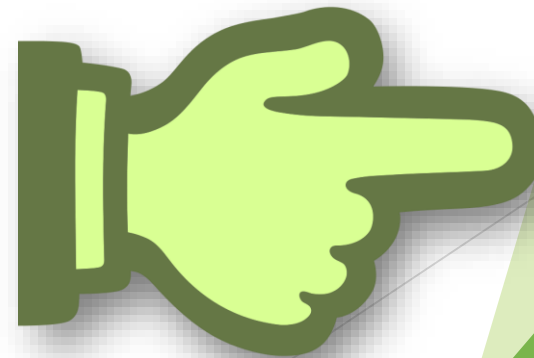
[CMS Emergency Preparedness Rule Overview](#)



Training & Testing

CMS Requirement §491.12(d)

The RHC/FQHC must develop and maintain an emergency preparedness training and testing program that is based on the emergency plan set forth in paragraph (a) of this section, risk assessment at paragraph (a)(1) of this section, policies and procedures at paragraph (b) of this section, and the communication plan at paragraph (c) of this section. The training and testing program must be reviewed and updated at least annually:



Training

CMS Requirement §491.12(d)(1)

(1) **Training Program**. The RHC/FQHC must do all of the following:

- (i) Initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing services under arrangement, and volunteers, consistent with their expected roles,
- (ii) Provide emergency preparedness training at least annually.
- (iii) Maintain documentation of the training.
- (iv) Demonstrate staff knowledge of emergency procedures.



Testing *aka* “EXERCISES”

CMS Requirement §491.12(d)(2)

(2) **Testing**. The RHC/FQHC must conduct exercises to test the emergency plan at least annually. The RHC/FQHC must do the following:

(i) Participate in a full-scale exercise that is community-based or when a community-based exercise is not accessible, an individual, facility-based. If the RHC/FQHC experiences an actual natural or man-made emergency that requires activation of the emergency plan, the RHC/FQHC is exempt from engaging in a community-based or individual, facility-based full-scale exercise for 1 year following the onset of the actual event.



Testing *aka* “EXERCISES”

CMS Requirement §491.12(d)(2)

(ii) Conduct an additional exercise that may include, but is not limited to following:

(A) A second full-scale exercise that is community-based or individual, facility-based.

(B) A tabletop exercise that includes a group discussion led by a facilitator, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.

(iii) Analyze the RHC/FQHC's response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the RHC/FQHC's emergency plan, as needed.

Disaster Drill Ground Rules

- ▶ Test YOUR plan, not the people;
- ▶ Relax -there are no right or wrong answers;
- ▶ Respond based on your current CHC capability;
- ▶ Allow for artificialities of the scenario -it's a tool;
- ▶ Feel free to improvise -think outside the box;
- ▶ It is a safe environment, a chance to propose and test solutions;
- ▶ The more you contribute, the more successful you will be at exercising the plan and procedures.



Drills Definitions

- ▶ Drills are activities that test, develop, or maintain skills in a single emergency response procedure. The focus is limited;
- ▶ Supervised activity to test a procedure which is a *component* of the overall Emergency Management Plan:
 - ▶ Evacuation plan;
 - ▶ Fire drill;
 - ▶ Staff contact list notification drill.

Types of Exercises

- ▶ **Table Top Exercise:** uses *paper and verbal scenarios* to evaluate the Emergency Management Plan and procedures effectiveness with a minimum amount of stress.
- ▶ **Functional Exercise:** is one in which the entire “community’s response” is evaluated. The community means the hospital or health care facility. This will involve the activation and simulated activity of *all sections of the ICS*.
- ▶ **Full Scale Exercise:** also commonly referred to as a “field exercise” is often the culmination of previous drills and exercises. It will test the mobilization of all or as many as possible or the response component’s.

Scenario Definition

- ▶ A narrative of events that have occurred immediately prior to the exercise, including:
 - ▶ Time of day
 - ▶ Temperature
 - ▶ Location
 - ▶ Number of people involved
 - ▶ Other relevant information that will give the player enough facts make decisions

Exercise Roles

- ▶ **Controller** - Facilitates the exercise;
- ▶ **Participants** - (Players) Key Staff & Decision Makers;
- ▶ **External Agencies** - Elected / Appointed Officials;
- ▶ **Evaluators:**
 - ▶ Observe behavior in relation to plans & procedures;
 - ▶ Record Information without leading Players;
 - ▶ Report observations.
- ▶ **Observers:**
 - ▶ Observe exercise; No interaction in exercise play

Exercise Hotwash



- ▶ A debrief or “hotwash” held immediately following the exercise with participants, the exercise planning team, controllers & evaluators;
- ▶ Allows controllers and evaluators to collect observations and thoughts about the exercise which leads to the development of preliminary analyses of exercise observations.

Setting Drill/Exercise Objectives

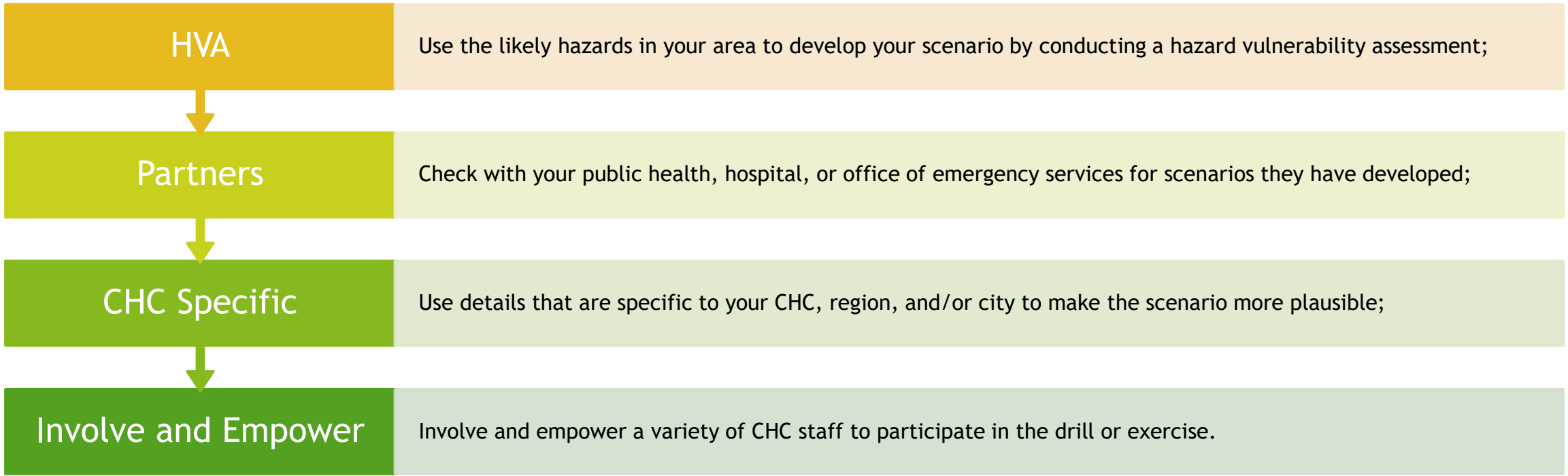
- ▶ Drill or Exercise objective considerations:
 - ▶ Setting achievable OBJECTIVES that can be met during the exercise;
 - ▶ Determine WHAT you want to test of your plan- single function or multiple functionalities;
 - ▶ TEST the plan more than once - practice;
 - ▶ INVOLVE different type/department staff;
 - ▶ Write your After Action Report using the objectives as performance benchmarks.

After Action Report (AAR)

- ★ Written Chronological Report for each objective & associated activities;
- ★ Highlight both strengths and areas for improvement;
- ★ Identify discussion points relevant to your site's ability to carry out the activities;
- ★ Demonstrate the capabilities being exercised.

Improvement Plan (IP)

- ▶ The improvement plan outlines concrete, actionable steps to address preparedness gaps identified in the AAR;
- ▶ Used to improve the Emergency Management Plan;
- ▶ Also known as a Corrective Action Plan.



Customizing your Scenario

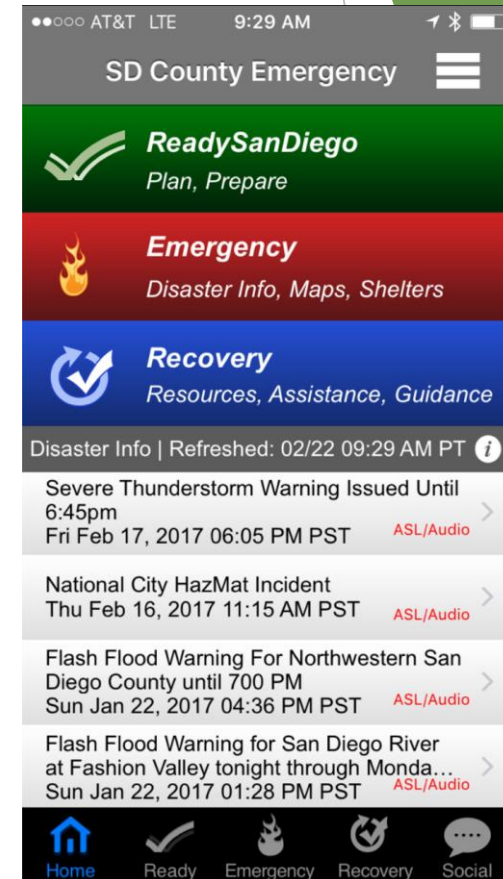
Scenario Development Tips

- ▶ Make it a plausible, known threat either for a man-made or natural disaster event your community could face
- ▶ Modularize your exercise to include several timeframes of emergency response and recovery, i.e., at the time of the event, 6 hours later, the next day, the next week, etc.;
- ▶ Once comfortable with conducting internal exercises, invite local stakeholders to join you the next time - CHC Board members, public health, hospital, office of emergency services, community organizations, etc.

Ready San Diego

San Diego County Emergency Resource App:

- Plan and Prepare;
- Emergency Disaster Info, Maps, Shelters;
- Recovery Resources, Assistance and Guidance



Emergency Preparedness Health Care Coalitions (HCC)

- ▶ Came out of the US Department of Health and Human Services Office of the Assistant Secretary for Preparedness & Response (ASPR);
- ▶ Previously, the Hospital Preparedness Program (HPP);
- ▶ HCCs work with local partners within each region to prepare hospitals, emergency medical services, and supporting healthcare organizations to deliver coordinated and effective care to victims of terrorism and other public health/healthcare emergencies.
- ▶ In San Diego County - San Diego Health Disaster Council

Drill and Exercise Resources

- ▶ National Incident Management System & ICS - [FEMA Training](#)
- ▶ Business Continuity Plan Template - [NACHC](#)
- ▶ Emergency Operations Plan Template - [Kansas Department of Health](#)
- ▶ Emergency Operations Plan Template - [Colorado Community Health Network](#)
- ▶ Incident Response Guides - [California EMS Authority](#)
- ▶ HICS Job Action Sheets - [California EMS Authority](#)
- ▶ HSS ASPR “Exercise in a Box” - [2017-2022 Health Care Preparedness and Response Capabilities guidance](#)
- ▶ [Greater New York Hospital Assoc Exercise Guide](#)
- ▶ [WV Department of Homeland Security Exercise Guide](#)
- ▶ **Drill and exercise definitions-** [ARES](#)
- ▶ [Greater New York Hospital Association's](#) **Drill and Exercise Scenario and Evaluation-** O’Neill
- ▶ [WV Department of Homeland Security](#)
- ▶ [AAR Template](#)

Post-Training Check-In

- ▶ What was helpful?
- ▶ Did we find any gaps?



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



Contact Us!



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