




The Emergency Management Continuum
 CMS EP Requirements- A "Team" Approach to Compliance
 Stan Szyptek, Fire and Life Safety, Inc. / CAHF Consultant
 Jason Belden, CAHF, Director of Emergency Preparedness and Physical Plant Services




**Stan Szyptek,
President
Fire and Life
Safety, Inc. (FLS)**




- ~ California Association of Health Facilities
 - o Life Safety / Emergency Prep
- ~ Utah Health Care Association
 - o Life Safety / Emergency Prep
- ~ Arizona Health Care Association
 - o Life Safety
 - o Disaster Ready / EPIC
- ~ Fire and Life Safety, Inc. Clients
 - o Arizona Association for Community Health Centers
 - o Arizona Ambulatory Surgery Centers Association
 - o Skilled Nursing Facilities
 - o Assisted Living Facilities
 - o In-Patient Hospice Facilities
 - o Community Health Centers
 - o Continuing Care Retirement Communities
 - o Long-Term Care Associations- Nationwide
- ~ Deputy Fire Chief / Fire Marshal
 - o 26 years- Chicago-area Fire Department
 - o Paramedic
 - o Honorably Retired- 2003






**Jason Belden,
Director of
Emergency
Preparedness &
Physical Plant
Services**



- ~ California Association of Health Facilities
 - o Directs Life Safety, EP, IP&C, Physical Plant programs
 - o Manages three disaster grants
 - o AHCA EP & LSC Committee
 - o CCPCC Board Member
 - o HBSB Board Member
 - o Incident Commander SAS-MAP
 - o ESF-8 CAL-OES Liaison
 - o CDC/HHS LTCF Program Liaison
- ~ Firefighter/EMT
 - o Volunteer and POC Vacaville Fire
 - o Retired- 2009
 - o CERT Team Member- Sacramento Fire





CMS
CENTERS FOR PROGRAMS & MEDICARE SERVICES

CMS Emergency Preparedness Rule
- E-Tags



Key Components:

- ▶ 3 Years in Development (Not new)
- ▶ Rule Issued: September 8, 2016
- ▶ Rule Published: September 16, 2016
- ▶ Rule Effective: November 16, 2016
- ▶ Implementation Required By: November 15, 2017

▶ 4 Requirements:

1. Develop Emergency Plan based on a Risk Assessment
2. Develop Policies and Procedures
3. Create Communication Plan
4. Conduct Training & Plan Testing



Image of a Hero....
Barbara Richards
Monette Manor Nursing Home




Acronyms Referenced in this Session

| | | |
|--|--|--|
| EOP – Emergency Operations Plan | HVA – Hazard Vulnerability Assessment | CMS – Center for Medicaid/Medicare Services |
| NHICS – Nursing Home Incident Command System | COOP – Continuity of Operations | EID – Emerging Infectious Disease |
| MHOAC – Medical Health Operational Area Coordinator | HPP – Hospital Preparedness Program | HCC – Health Care Coalition |


New Areas of Survey Focus

| | | |
|---|---|---|
| Expanded surveyor guidance surrounding potential deficiencies for alternate sources of energy | Added new definitions of acceptable testing exercises | Added additional considerations for EID planning and PPE |
| Added risk assessment considerations for EID | Includes planning considerations for surge and staffing | Expanded guidance on reporting and responding to bed polling requests |

 Emergency Prep Rule

Emergency Program (E-001)

"All Hazards" Emergency Management



E-001- Emergency Preparedness Program


Develop and maintain a comprehensive "program" that complies with federal, state and local EP requirements

EP program must be in writing

Program is reviewed annually (LTC requirement)


Changes to program more frequently, if required outside of update cycle

Surveyors will interview leadership to describe the EP program

 Emergency Prep Rule

Emergency Program (E-001)

"All Hazards" Emergency Management



E-001- Emergency Preparedness Program

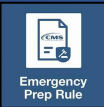
Addresses your residents' unique clinical and support need

Focuses on the facility's High Risk Threats

Reflects local Emergency Planning capabilities


Includes:

- System for Command & Control Communications
- Resources and Assets and Supply Needs
- Safety and Security
- Staff Responsibilities

 Emergency Prep Rule

Develop and Maintain Emergency Plan (E-004)

"All Hazards" Emergency Management





E-004- Emergency Plan

Elements of the Emergency Plan shall include:

- ~ Natural disasters
- ~ Man-made disasters
- ~ Facility-based disasters not limited to:
 - ~ Care-related emergencies
 - ~ Equipment / utility failures
 - ~ Interruption in communications; including cyber attack
 - ~ Loss of all or portion of a facility
 - ~ Supply chain disruption
 - ~ Staffing shortages
- ~ Emerging Infectious Diseases (EID)
 - ~ Focus on Continuity of Care

**** Medicare/Medicaid Certification date in front of plan (E-015)**





Emergency Prep Rule

Risk Analysis (E-006)


Hazard Vulnerability Assessment (HVA)


- Facility-based
- Community-based



Incident Type


- ~ Probability
 - o Likelihood of occurrence
- ~ Severity = Impact
 - o Human
 - o Property Business
- ~ Mitigation = Preparedness & Response
 - o Internal
 - o External

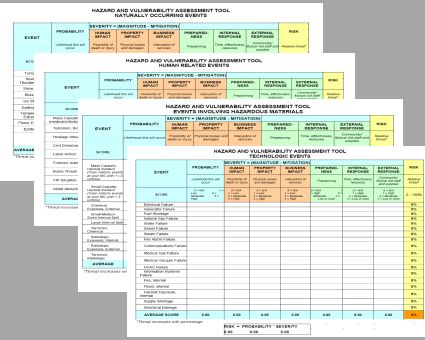




Emergency Prep Rule

Risk Analysis (E-006)

Hazard Vulnerability Assessment (HVA)









Risk Analysis (E-006)

Hazard Vulnerability Assessment (HVA)



Who should participate in the HVA Process?



Answer...

EVERYONE

Risk Analysis (E-006)
Hazard Vulnerability Assessment (HVA)

How do you think non-nursing team members rated the probability of a pandemic pre-COVID-19?

Risk Analysis (E-006)
Hazard Vulnerability Assessment (HVA)

How would your "whole team" rank the risk of a pandemic today?


Emergency Prep Rule

Incident Management Process

- "All Hazards" Approach
- Incident Command System

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graph TD
    IC[Incident Commander] --- PIO[Public Information Officer]
    IC --- LO[Liaison Officer]
    IC --- SO[Safety Officer]
    IC --- OSC[Operations Section Chief]
    IC --- PSC[Planning Section Chief]
    IC --- LSC[Logistics Section Chief]
    IC --- FSC[Finance Section Chief]
  
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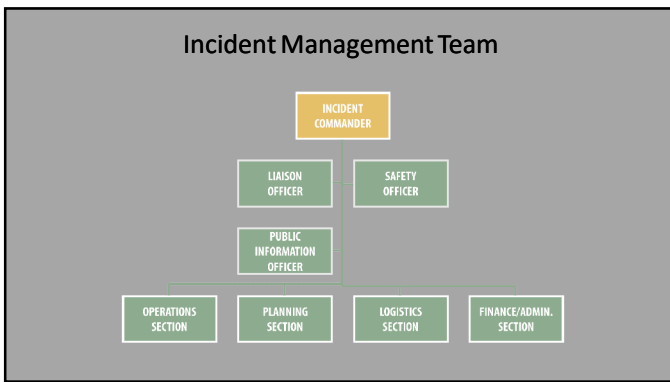
Emergency
Prep Rule

Incident Management
Process (E-006)

- "All Hazards" Approach
- Incident Command System




- ~ Common terminology
- ~ Modular organization
- ~ Management by SMART objectives
- ~ Reliance on an Incident Action Plan (IAP)
- ~ Manageable span of control
- ~ Pre-designated incident locations/facilities
- ~ Resource management
- ~ Integrated communications
- ~ Common command structure



The Incident Action Plan (IAP)

The IAP is filled out and updated throughout the duration of the emergency by the Planning Section Chief, who does the following:

- Gather the needed information from the different members of the Incident Management Team (IMT)
- Identify priorities and SMART objectives
- Monitor the situation using input from IMT
- Record the objectives the Incident Commander selects, the tasks that are assigned and to whom they are delegated

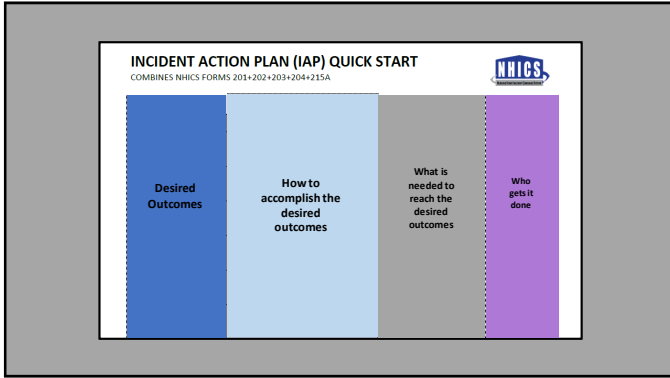



INCIDENT ACTION PLAN (IAP) QUICK START

COMBINED NHICS FORMS 2014-2014-2014-2014-2014

| | |
|------------------|-----------------------|
| 1. INCIDENT NAME | 2. OPERATIONAL PERIOD |
| DATE: FROM: TO: | DATE: FROM: TO: |
| TIME: FROM: TO: | TIME: FROM: TO: |

3. SITUATION SUMMARY - NHICS 201 -






| | |
|-----------------------|-----------------------|
| Incident Command | |
| Medical Officer | Rescue Officer |
| Public Health Officer | Public Health Officer |
| Operations Chief | Planning Chief |
| Logistics Chief | Finance/Admin Chief |

NHICS Tools:

- Job Action Sheets
- Forms- 200, 201, etc
- IPG / IRG






NHICS Tools:

“The Power of the Vest”




NHICS TOOLS


- Revised 2017
- Guidebook
- Training Modules (4 Power Points)
- Forms (18 Forms)
- Incident Planning Guide (Master)
- Incident Response Guides (11 Hazards)
- Job Action Sheets (One for 10 Positions)





Can be downloaded from:
<https://www.cahtdisasterprep.com/nhics>




Incident Management Process
 - "All Hazards" Approach
 - Incident Command System)



Should the direct care staff, & IP receive NHICS training?

Should the D.O.N., nurse leadership and IP be part of the IMT?






Incident Management Process
 - "All Hazards" Approach
 - Incident Command System)




What is the role of the D.O.N. or nurse leader on the Incident Management Team?





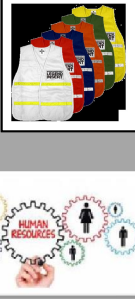

 Emergency Prep Rule


Incident Management Process
 - "All Hazards" Approach
 - Incident Command System)

 **Nursing Home**
INCIDENT COMMAND SYSTEM


Incident Dependent

- " Fire
- " Flood
- " Power Failure
- " Infectious Disease Outbreak
- " Shelter-in-Place
- " Evacuation
- " Mechanical Failure
- " Wildfire
- " Mass Casualty



 Emergency Prep Rule


Resident Population & COOP (E-007)
 - Template

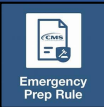
 BUSINESS CONTINUITY

E-007- Resident Population / Continuity
 Address Resident Population including but not limited to


- " Persons at Risk
- " Types of services the LTC has the ability to provide during an emergency
- " Continuity of Operations
 - o Delegations of Authority
 - o Succession Plans

Service capabilities during EID




 Emergency Prep Rule

COOP (E-007)

 BUSINESS CONTINUITY

8 Essential Functions of COOP

- " Essential Functions and Operations
- " Lines of Succession
- " Delegation of Authority
- " Alternate Care Sites
- " Vital Systems and Equipment
- " Vital Records
- " Communication Systems Supporting Essential Functions
- " Restoration and Recovery



E-009- Process for Collaboration

Process shall include cooperation and collaboration with Emergency Preparedness officials:

- ~ Local
- ~ Tribal
- ~ Regional
- ~ State
- ~ Federal

Surveyors will expect sufficient details documented to verify the process. Will interview staff to verify process.


Collaboration

- Coalition Participation
- Local First Responders
- Others

Should the D.O.N. , I.P. and direct care staff participate in coalition meetings?


- ~ Training
- ~ Drill & Exercises
- ~ Emergency Management
- ~ Infection Control
- ~ Surge
- ~ After Action / After Incident Reporting

THE ANSWER IS YES

 Emergency Prep Rule

Policies and Procedures (E-013)


“All Hazards” Emergency Management



E-013 Policies and Procedures

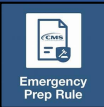
P&P must be based on:

- ~ Emergency Plan
- ~ Risk Assessment
 - o Facility-based HVA
 - o CHVA
- ~ Communication Plan
- ~ **CMS not specifying format**
 - ~ Hard copy
 - ~ Electronic
 - ~ Other systems-based Plans
- ~ **Verification Annual Review & Updating**
 - ~ LTC only




Compliance = Paperwork !

 Emergency Prep Rule

Develop and Maintain Emergency Plan (E-015)

“All Hazards” Emergency Management



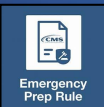
E-015 Provision of Subsistence Needs

Needs for staff and residents whether they evacuate or shelter-in-place include but no limited to the following:

- ~ Food, water, medical and pharmaceutical supplies
- ~ Alternate sources of energy to maintain the following:
 - ~ Temperatures to protect patient health and safety and for the safe and sanitary storage of provisions
 - ~ Emergency lighting
 - ~ Fire detection, extinguishing and alarm systems
 - ~ Sewage and waste disposal


Should consider subsistence needs of volunteers, visitors and others sheltering at the facility during an event

Facilities certified after 10/1/90- Temps 71 – 81 degrees F
**** Medicare/Medicaid Certification date in front of plan ****



Emergency
Prep Rule

Other E-Tags



~ E-020- Evacuation

- o Placement of signs, staff responsibilities & patients' needs
- o **Protocols for non-compliant patient refusing to evacuate**

~ E-022- Sheltering



- o Identification of safe & hardened areas in facility

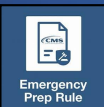
~ E-023- Medical Documentation

- o Maintain confidentiality, security & availability

~ E-024- Volunteers / Emergency Staffing Strategies


- o Surge staffing- natural disasters & EID
- o Interview leadership to explain use of volunteers & 4emergency staffing strategies if volunteers aren't utilized / **Verify P&Ps**



Emergency
Prep Rule

Other E-Tags

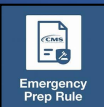


~ E-025- Arrangement with other Facilities

- o Focus on resident population
- o Ensure receiving facility is appropriate for special needs
- o Focus on continuity of care / services
- o Agreements reviewed annually


~ E-026- 1135 Waiver

- o Role in the providing of care and treatment under waiver in alternate care sites (ACS)
- o Awareness of flexibilities exercised with or without waiver
- o ACS Factors
 - o Emergency/disaster spread across a community
 - o Anticipated longevity of operating the ACS
 - o Level of the capacity the ACS can provide
 - o How the ACS correlates with the need for transfers and discharge
- o Planning for ACS is a proactive step to ensure continuity of service
- o Time limited- waives ONLY federal requirements; NOT state requirements



Emergency
Prep Rule

Communications
Plan





Multiple Comms. Requirements

~ E-029- Communication Plan

~ E-030- Names and Contact Information

~ E-031- Emergency Official Contact Information

~ E-032- Primary/Alternate Means of Communication

Should the clinical leadership and IP be part of communication planning?

Incident Management Process
- Communications

Random Question...

Example of Contingencies
- Charting

If your facility's EOP was developed without input from nurse leadership, do you think resident-care related issues and contingencies can be adequately addressed?

Emergency Prep Rule

Other E-Tags



- ~ E-033- Methods of Sharing Information
- ~ E-034- Sharing Information on Occupancy/Needs
- ~ E-035- LTC and ICF/IID Family Notification
- ~ E-036- Emergency Prep Training and Testing
 - o Annual for LTC
- ~ E-037- Emergency Prep Training Program
- ~ E-039- Emergency Prep Testing Requirements
- ~ E-041- LTC Emergency Power
- ~ E-042- Integrated Health Systems

LESSONS LEARNED

Plan Revisions

Analyze the LTC facility's response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the LTC facility's emergency plan, as needed.


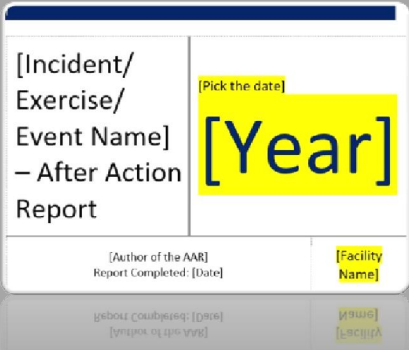
Review and Plan Revision (E-039)
- (2-B-iii)

LESSONS LEARNED

Real World Incidents

- COVID-19
- Facility Emergency
- Disaster
- Drill & Exercises

?

Emergency Planning and Management

Should your entire leadership team be part of all aspects of emergency planning and management?






Can a LTC effectively develop and utilize an "All Hazards" EOP without the whole team?

Emergency Planning and Management

Planning

CMS Memo- QSO-20-41-ALL
September 28, 2020

~ Provided clarification on exercise definitions

- o Full Scale Exercise (FSE)- multiple functions / multiple agencies
- o Functional Exercise (FE)- individual functions / capabilities
- o Mock Disaster Drill (Exercise of Choice)- validate specific function(s)
- o Tabletop Exercise (Exercise of Choice)- discussion-based exercise
- o Workshop (Exercise of Choice)- discussion focused on planning

~ COVID-19 Exemption

- o Facilities that activated the emergency plans are exempt from the next required full-scale community-based or individual, facility-based functional exercise
 - Must provide written documentation to verify that their emergency program was activated
 - o Incident Action Plans (IAP)
 - o IAP Meeting Minutes
 - o AAR or variation of an analysis of incident management

LESSONS LEARNED

Review and Plan Revision (E-039)


COVID-19 Exercise Exemption
* Additional Exemption- 6/21/21

The chart shows a timeline from January 2019 to November 2021. Key events include: Full Scale Exercise (conducted) in Jan 2019; Exercise of Choice (TX) (conducted) in Nov 2019; Full Scale Exercise (planned) in Jan 2020; Emergency Activation in March 2020; Workshop (due) in Nov 2020; Full Scale Exercise (due) in Jan 2021; and Exercise of Choice (TX) (due) in Nov 2021. A red 'X' marks the Jan 2021 Full Scale Exercise as EXEMPT.

LESSONS LEARNED

COVID-19 Lessons

Review and Plan Revision (E-039)




- “ Regulatory Changes- Evolving with Scenario
 - o Keeping P&P current and up-to-date; Draft-format
 - o 1135 Blanket Waiver considerations
 - o Regulatory references that may need to be revised in the EOP
 - o Emergency Staffing Protocols (focus of IC Surveys)
 - o P&P revisions when waivers or emergency declaration expires
- “ Add quarantine information to the EOP
 - o Typically only addresses Shelter-in-Place and Evacuation
- “ Add screening criteria to the EOP
 - o Life Safety Code considerations
- “ Adding logistical information to the EOP
 - o Emergency procurement procedures
 - o Corporate or group purchasing assistance- PPE, supplies, etc.
 - o Storage of supplies and Life Safety Code compliance

LESSONS LEARNED

COVID-19 Lessons

Review and Plan Revision (E-039)



- “ Add resident and staff testing procedures to EOP
 - o Emergent Infectious Disease (EID) section
- “ Add visitation restriction protocols to EOP
- “ Development of good relationship with...
 - o Environmental Services
 - o Maintenance / Facilities Management
 - o Corporate support
 - o Health Care Coalition
 - o Nursing Home Association
- “ Emergency Bio-Hazard Waste Protocols
- “ Protocols for protracted emergencies & disasters

Resource Guidance





Sample Policy for Emergent Infectious Diseases for Skilled Nursing

Shelter In Place: Planning Resource Guide for Nursing Homes

100%
Commitment = Readiness

- Time
- Human Resources
- Equipment
- Logistics
- Financial

COMMITMENT

COMPLIANCE

This infographic features a silhouette of a person with arms crossed and a '100%' label above it. Below is a list of resources: Time, Human Resources, Equipment, Logistics, and Financial. To the right, a hand writes 'COMMITMENT' on a green chalkboard. At the bottom, the word 'COMPLIANCE' is formed by red letters held up by many hands.

Challenges

Barriers

- Time
- Human Resources
- Equipment
- Logistics
- Financial

Staff

EMPLOYEE TURNOVER

\$

This infographic shows a person running on a path towards a sunset. Below is a list of barriers: Time, Human Resources, Equipment, Logistics, and Financial. To the right, a photo shows a busy outdoor scene with people and equipment. Below the photo are three icons: a person labeled 'Staff', a megaphone labeled 'EMPLOYEE TURNOVER', and a dollar sign labeled '\$'.

Goals

Culture

Interoperability


Continuity of Services

Culture

Prepare **Respond** **Recover**

This infographic features a target icon with a checklist labeled 'Goals'. Below is the text 'Culture', 'Interoperability', and 'Continuity of Services'. To the right, a green sign reads 'Culture'. At the bottom, three icons represent 'Prepare', 'Respond', and 'Recover'.

- ~ Communities can't control what comes their way
- ~ Understand that "It can happen to you"
- ~ Facilities can control levels of preparedness, response and recovery capabilities
- ~ Understand Human Nature = **Culture of Preparedness**
- ~ Know the Hazards and Perils = **HVA**
- ~ Command and Control = **All Hazards EM**
- ~ Plan to Recover = **Limited Service Disruption**
- ~ Know the Regulations & Trends = **Compliance**
- ~ Robust Disaster Management = **Reduced Risk Exposure**



Bottom Line




THANK YOU



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