

Emergency Preparedness

This final rule establishes national emergency preparedness requirements for Medicare- and Medicaid-participating providers and suppliers to plan adequately for both natural and man-made disasters, and coordinate with federal, state, tribal, regional, and local emergency preparedness systems. It will also assist providers and suppliers to adequately prepare to meet the needs of patients, residents, clients, and participants during disasters and emergency situations. Despite some variations, our regulations will provide consistent emergency preparedness requirements, enhance patient safety during emergencies for persons served by Medicare- and Medicaid-participating facilities, and establish a more coordinated and defined response to natural and man-made disasters.

<https://www.gpo.gov/fdsys/pkg/FR-2016-09-16/pdf/2016-21404.pdf>

Interpretative Guidelines E Tags

“These Conditions of Participation (CoP), Conditions for Coverage (CfC), Conditions for Certification and Requirements follow the standard survey protocols currently in place for each facility type and **will be assessed during initial, revalidation, recertification and complaint surveys as appropriate.** Compliance with the Emergency Preparedness requirements will be determined in conjunction with **the existing survey process** for health and safety compliance surveys or Life Safety Code (LSC) surveys for each provider and supplier type.”

CMS has identified 44 E tags related to Emergency Preparedness. There are 20 E Tags related to Rural Health Clinics and are as follows:

1. 0001 Establishment of Emergency Preparedness
2. 0004 Develop and Maintain EP Program
3. 0006 Maintain and Annual EP Updates
4. 0007 EP Program Patient Population
5. 0009 Process for EP Collaboration
6. 0013 Development of EP Policies and Procedures
7. 0020 Policies and Procedures including Evacuation
8. 0022 Policies and Procedures for Sheltering
9. 0023 Policies and Procedures for Medical Docs.
10. 0024 Policies and Procedures for Volunteers
11. 0029 Development of Communication Plan
12. 0030 Names and Contact Information
13. 0031 Emergency Officials Contact Information
14. 0032 Primary/Alternate Means for Communication
15. 0033 Methods for Sharing Information
16. 0034 Sharing Information on Occupancy/Needs
17. 0036 Emergency Prep Training and Testing
18. 0037 Emergency Prep Training Program
19. 0039 Emergency Prep Testing Requirements
20. 0042 Integrated Health Systems

<http://www.ruralhealthclinic.com/emergency-preparedness>

Emergency Preparedness

87% of organizations with an Emergency Preparedness Plan have activated it one or more times in the last five years. Active Shooter is not a Black Swan. Healthcare facilities should plan and train for an active shooter event.

The Kaiser Risk Assessment Tool has been updated. There is a 2014 version and a 2017 version that accounts for actions and training to mitigate the vulnerability to the risk. RHCs in most cases should use the 2014 version.

Healthcare Business Specialists has a web page devoted to Emergency Preparedness and RHCs. Here is the link and some sample information:

<http://www.ruralhealthclinic.com/emergency-preparedness>

Self Assessment: Where do you stand on being ready for Emergency Preparedness? Take this self assessment form to determine your readiness for compliance.

[Self Test for Emergency Preparedness.](#)

CFR and Regulatory Citations: Emergency Preparedness and related regulations

[CFR publication of the Emergency Preparation Regulations \(September 16, 2016, 186 page PDF\)](#)
[The Stafford Act requiring Mitigation Plans for States and local governments \(181 page PDF\)](#)

Definitions, Resources, Interpretative Guidelines: The language of Emergency Preparedness is very specific. CMS has provided definitions of the terms used when discussing Emergency Planning for healthcare providers. We provide the link to the definitions below:

[CMS Definitions of terms used in Emergency Preparedness](#)

[CMS Resources at your Fingertips by ASPR Tracie \(16 page PDF with a list of resources\)](#)

[CMS Interpretative Guidelines - Appendix Z released June 8, 2017](#)

[CMS Surveyor's Citations for RHCs only \(ETags\) Excel](#)

HBS has provided some sample Emergency Preparedness policies and procedures for RHCs:

[Emergency Preparedness Sample Policies and Procedures for RHCs](#)

CMS Website and Links: CMS (Centers for Medicare and Medicaid Services) has several websites dedicated to Emergency Preparedness. These links will take you to those websites and those websites have a number of links that you can explore and contain resources and requirements:

[CMS Survey & Certification Emergency Preparedness](#)

[CMS Templates and Checklists](#)