DEVELOPING AN EFFECTIVE AND COMPLIANT EMERGENCY PREPAREDNESS PROGRAM
FOR LONG TERM CARE
SESSION #4

RUSSELL PHILLIPS & ASSOCIATES
Fire and Emergency Management for Healthcare Facilities

AGENDA: TRAINING & TESTING

► Training: requirements for all staff
► Exercises: requirements, types
► Documentation of Training and Exercises

► Summary
► Questions & Answers

“THIS IS WHY → THIS IS HOW”
Who

When

What

TRAINING: REQUIREMENTS

Training Programs

TRAINING: REQUIREMENTS

Training Programs - WHO

Initial training for new and existing staff, individuals providing services under arrangement, and volunteers consistent with their expected role
**TRAINING: REQUIREMENTS**

**Training Programs - WHEN**

- Provide training at least annually
- Maintain documentation of training
- Demonstrate staff knowledge of emergency procedures

**TRAINING: REQUIREMENTS**

**Training Programs - WHAT**

- Develop and maintain an emergency preparedness training and testing program based on the emergency plan
  - Not prescriptive
  - Variety of mechanisms
  - Variety of topics
TRAINING: REQUIREMENTS

Training Programs - WHAT

- Emergency Operations Plan
  - Activation protocols
  - Plan contents
  - Accessing key information
  - Immediate actions

TRAINING: REQUIREMENTS

Training Programs - WHAT

- Understand personal emergency preparedness
- Become familiar with the tools available for personal and professional readiness
  - Emergency Kit
  - Family Emergency Communication Plan
  - Family Preparedness Skills
TRAINING: REQUIREMENTS

Training Programs - WHAT

- Specific Procedures
- Specialized Equipment

TRAINING: REQUIREMENTS

Training Programs - WHAT

- Incident Command Training
  - ICS / NHICS
  - National Incident Management System (NIMS)

Welcome to IS-700.A:
National Incident Management System (NIMS), An Introduction

NursingHome INCIDENT COMMAND SYSTEM

NHICS GUIDE
FEMA NIMS COURSE LIST
Consider a training matrix by staff types or expected roles.
TRAINING: REQUIREMENTS

Training Programs

Survey Procedures

- Ask for copies of the facility’s initial emergency preparedness training and annual emergency preparedness training offerings.

- Interview various staff and ask questions regarding the facility’s initial and annual training course, to verify staff knowledge of emergency procedures.

- Review a sample of staff training files to verify staff have received initial and annual emergency preparedness training.

TRAINING: REQUIREMENTS

Information Sharing

- Method for sharing information from the emergency plan that the facility has determined appropriate for residents and families/responsible parties

  - Could include in family orientation and/or a newsletter
  - No frequency requirement by CMS – COMMUNICATIONS PLAN
**EXERCISES: REQUIREMENTS, TYPES**

**Exercise Types**

- Seminar
- Workshop
- Games
- Drill – *If you activate your Command Center, etc.*
- Tabletop Exercise (TTX)
- Functional Exercise (FE)
- Full-Scale Exercises (FSE)

---

Homeland Security Exercise and Evaluation Program (HSEEP)

---

**EXERCISES: REQUIREMENTS, TYPES**

**Center for Clinical Standards and Quality/Survey & Certification Group**

**DATE:** March 24, 2017  
**TO:** State Survey Agency Directors  
**FROM:** Director, Survey and Certification Group  
**SUBJECT:** Information to Assist Providers and Suppliers in Meeting the New Training and Testing Requirements of the Emergency Preparedness Requirements for Medicare & Medicaid Participating Providers and Suppliers Final Rule

**Memorandum Summary**

Information for Implementation: The Centers for Medicare & Medicaid Services (CMS) is providing information to assist providers and suppliers in meeting the Training and Testing requirements of the new Emergency Preparedness Final Rule that was published on September 16, 2016 (81 FR 63860) and became effective on November 15, 2016.

**Background**

The Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers Final Rule became effective on November 15, 2016 with an implementation date of November 15, 2017. A correction notice was published on November 15, 2016 (81 FR 80594).
EXERCISES: REQUIREMENTS, TYPES

Exercise Types

- Seminar
- Workshop
- Games

NOT Acceptable

Effective Training!

EXERCISES: REQUIREMENTS, TYPES

Exercise Types

- Drill – “unannounced staff drills”

(2) Testing. The LTC facility must conduct exercises to test the emergency plan at least annually, including unannounced staff drills using the emergency procedures.
**Exercise Types**

- **Drill** – *If you activate your Command Center, etc.*

---

**Table-top exercise (TTX)**

CMS DEFINITION: A table-top exercise is a group discussion led by a facilitator, using narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan. It involves key personnel discussing simulated scenarios, including computer-simulated exercises, in an informal setting. TTXs can be used to assess plans, policies, and procedures.
Exercise Types

- Full-Scale Exercises (FSE) {Functional Exercise (FE)}

“For the purposes of this requirement, a full-scale exercise is defined and accepted as any operations-based exercise (drill, functional, or full-scale exercise) that assesses a facility’s functional capabilities by simulating a response to an emergency that would impact the facility’s operations and their given community.”

Testing Programs

- The LTC Facility must conduct at least two (2) exercises to test the emergency plan at least annually.
- Actual activations – if documented properly, can count as one (1) exercise.
Testing Programs

EXERCISES: REQUIREMENTS, TYPES

Exercise #1

- Participate in a “full-scale exercise” that is community-based, or when a community-based exercise is not available, an individual, facility-based one.

- Document attempts to engage your community! You must try.
Exercise #2

Conduct an additional exercise that may include, but is not limited to:

- A second “full-scale exercise” that is community-based, or individual facility-based
- A tabletop exercise that includes a group discussion, a narrated clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.
EXERCISES: REQUIREMENTS, TYPES

Testing Programs

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

U.S. DEPARTMENT OF HEALTH HUMAN SERVICES
CENTERS FOR MEDICARE & MEDICAID SERVICES

Health Care Provider After Action Report/Improvement Plan
Survey & Certification
Emergency Preparedness & Response

Enter Organization Name

Health Care Provider
After Action Report/Improvement Plan

Enter Full Name of Exercise or Event
EXERCISES: REQUIREMENTS, TYPES

Testing Programs

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

- Executive Summary
- Exercise Overview
- Objectives of the Exercise
- Successes & Areas for Improvement
- Improvement Plans

Emergency Preparedness

Sunnydale Nursing & Rehab EPP Team

Meeting Agenda
June 1, 2017
9:00 AM

1) Review of any recent events
   a) Developing an After Action Report & any Improvement Plans
2) Review of existing or drafts of new plan:
   a) Communications Plan Updates
   b) Active Shooter Plans – Local PD attending
3) Upcoming or scheduled training or exercises
4) Review of ongoing improvement plans:
   a) From Mitigation Plans
   b) From Event & Exercise After Action Improvement Plans
5) Other issues from the group
EXERCISES: REQUIREMENTS, TYPES

Training & Testing Summary

- Initial training for new and existing staff, individuals providing services under arrangement, and volunteers consistent with their expected role.
- Provide training at least annually, include unannounced drills.
- Demonstrate staff knowledge of emergency procedures.
- Conduct at least two (2) exercises to test the emergency plan at least annually – one must involve the community.
- Actual activations – if documented properly, can count as one (1) exercise.
- Maintain Documentation of Training and Exercises.

STEMS 6 - 9: CMS Final Rule Assessment

2016 CMS Final Rule on Emergency Preparedness Assessment
FACILITY NAME / DATE REVIEWED

PART 483—REQUIREMENTS FOR STATES AND LONG TERM CARE FACILITIES

<table>
<thead>
<tr>
<th>Compliance</th>
<th>Notes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>C = Compliant</td>
<td>Provide description on how you met or partially met compliance.</td>
</tr>
<tr>
<td>P = Partial</td>
<td>Provide action steps to meet compliance where currently Non-Compliant.</td>
</tr>
<tr>
<td>N = Non-Compliant</td>
<td></td>
</tr>
</tbody>
</table>

(6) Training and Testing. The LTC facility 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.

1. Training program. The LTC facility 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.

2. Testing. The LTC facility must conduct exercises to test the emergency plan at least annually, including unannounced staff drills using the emergency procedures. The LTC facility 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 exercise. If the LTC facility experiences an actual natural or man-made emergency that requires activation of the emergency plan, the LTC facility 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.

3. Conduct an additional exercise that may include, but is not limited to the 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, a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.
   (c) 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.
### EPP COMPLIANCE CALENDAR

<table>
<thead>
<tr>
<th>Task</th>
<th>Responsible</th>
<th>Frequency</th>
<th>Date</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Hazard Vulnerability Analysis</td>
<td>EPP Team Leader &amp; EPP Team</td>
<td>Annually</td>
<td>January</td>
<td>Multiplying teams will constitute the external U.H.</td>
</tr>
<tr>
<td>Annual Mitigation Plans</td>
<td>EPP Team Leader &amp; EPP Team</td>
<td>Annually</td>
<td>January</td>
<td>Based on RHA determines higher risk areas and consider mitigation steps</td>
</tr>
<tr>
<td>Annual Compliance Calendar</td>
<td>EPP Team Leader &amp; EPP Team</td>
<td>Annually</td>
<td>February</td>
<td>Circles operation is reviewing past year's compliance</td>
</tr>
<tr>
<td>Quarterly EPP Team Meetings</td>
<td>EPP Team Leader &amp; EPP Team</td>
<td>Quarterly Meetings</td>
<td>March, June, September, December</td>
<td>Review risk assessments</td>
</tr>
<tr>
<td>EOP Annual Review</td>
<td>EPP Team Leader &amp; EPP Team</td>
<td>Annually</td>
<td>April, May</td>
<td>Working groups to review plans and provide training to June EPP Team meeting</td>
</tr>
<tr>
<td>EOP Annual Review:</td>
<td>EPP Team Leader &amp; EPP Team</td>
<td>Annually</td>
<td>July, August</td>
<td>Working groups to review EU plans per year and provide reviews; September EPP Team meeting</td>
</tr>
<tr>
<td>EOP Annual Review: Emergency Response Plans</td>
<td>EPP Team Leader &amp; EPP Team</td>
<td>Annually</td>
<td>October</td>
<td>Review all incident response plans per year; Updated annually with major revisions done on the EU basis</td>
</tr>
<tr>
<td>EOP Annual Review: Emergency Operations Plans</td>
<td>EPP Team Leader &amp; EPP Team</td>
<td>Annually</td>
<td>October</td>
<td>Review all incident response plans per year; Updated annually with major revisions done on the EU basis</td>
</tr>
</tbody>
</table>

**Annual Hazard Vulnerability Analysis**

**Annual Mitigation Plans**

**Annual Compliance Calendar**

**Quarterly / Monthly EPP Team Meetings**

**EOP Annual Review - BREAK IT DOWN!**
EPP COMPLIANCE CALENDAR

Training Plans:
- New Employees
- Annual for All Employees
- Leadership ICS / NHICS / NIMS training
- Any “special” training based on responsibilities (evacuation equipment, building lockdown, etc.)

Exercise Plans:
- Two (2) exercises to test the emergency plan at least annually – one must involve the community
- After Action Reports / Improvement Plans: ongoing attention during EPP Team Meetings

Yes, actual events – IF DOCUMENTED – can take the place of one of these. But don’t plan on that!

Resources: Will be emailed to you!
THANK YOU

Nick Gabriele  
Vice President

David Hood  
Principal