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Revised Emergency Preparedness Standards for Federally Qualified Health Centers

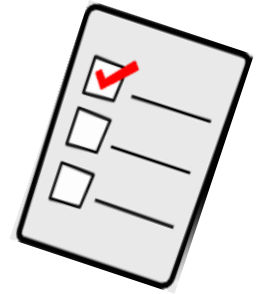
March 2020

Focus:

- 1.** Provide an overview of recent regulatory changes for FQHCs related to emergency preparedness
- 2.** Discuss related Joint Commission standards changes
- 3.** Describe changes to onsite survey process related to emergency preparedness

Regulatory Changes

- In September 2019, CMS issued its Burden Reduction Rule
- Goal = reducing burden on healthcare organizations by removing “obsolete and unnecessary” regulations
- Changes streamline regulations and allow increased flexibility



Regulatory Changes

- ✓ The changes apply to FQHCs
- ✓ Joint Commission standards and survey process changes were made to EM requirements for FQHCs to align with the regulatory changes
- ✓ The standards changes are effective **March 15, 2020**



Emergency Management: What has changed?

Emergency plan review:

- Timeframe for review of the FQHC's emergency preparedness plan was revised
- The requirement for annual review of the plan was changed from annually to biennially, **or every 2 years**

Emergency Management: What has changed?

Collaboration with local EM officials:

- ✓ Eliminated the requirement that the emergency plan include **documentation** of efforts to contact local, tribal, regional, State, and federal emergency preparedness officials and a facility's participation in collaborative and cooperative planning efforts.

Emergency Management: What has changed?

Instead...

- ✓ Now requires FQHCs to have a **plan** for cooperation and collaboration with local, tribal, regional, State, and Federal emergency preparedness officials' efforts to maintain an integrated response during a disaster or emergency situation.

Emergency Management: What has changed?

EM policies and procedures

- ✓ Timeframe for review of EM policies changed
- ✓ The timeframe for review and update of emergency preparedness policies and procedures was changed from annually to biennially, or **every 2 years**

Emergency Management: What has changed?

EM communication plan

- ✓ Must develop and maintain an emergency preparedness communication plan that complies with Federal, State, and local laws
- ✓ and must be reviewed and updated **at least every 2 years**

Emergency Management: What has changed?

Staff training on EM policy and procedures

FQHCs must conduct emergency preparedness **training**:

- ✓ upon initial hire and,
- ✓ thereafter biennially, (or **every 2 years**) and,
- ✓ whenever the emergency preparedness policies and procedures are significantly updated



Emergency Management: What has changed?

Conducting EM exercises

- ✓ Previously required FQHCs to test the emergency preparedness plan twice a year
- ✓ Requirement has changed –must now conduct a least one emergency preparedness exercise annually
- ✓ More flexibility is now allowed regarding the *type* of testing conducted...



Emergency Management: What has changed?

Types of emergency preparedness exercises:

- ✓ Must test the emergency plan ***annually*** – however, the type of testing must alternate between:
- ✓ A community-based, full scale exercise, if available or a facility-based, functional exercise

And in the opposite year,

- ✓ A full-scale, community-based exercise or a facility-based, functional exercise, mock disaster drill, or tabletop exercise

Related **Joint Commission** Standards Changes:

Revisions were made to several standards that apply to FQHCs to align with regulatory changes.

EM.02.01.01 EP 20 *(revised)*

- For rural health clinics and **federally qualified health centers**: The Emergency Management Plan, including the communication plan, must be reviewed and updated at least **every two years**

Related **Joint Commission** Standards Changes:

EM.02.02.01 EP 34 *(revised)*

- For rural health clinics and **federally qualified health centers**: The organization **has a process** for cooperation and collaboration with the local, state, tribal, regional, and federal emergency preparedness officials' efforts to maintain an integrated response during a disaster or emergency situation.

Related **Joint Commission** Standards Changes:

EM.02.02.07 EP 20 *(revised)*

- For rural health clinics and federally qualified health centers: The organization provides emergency preparedness training to staff, volunteers, and individuals providing on-site services under arrangement at the following intervals:
- **Initial training**;
- At least **every two years**
- when **roles or responsibilities change**
- when **policies and procedures are significantly updated**

This training is documented.

Related **Joint Commission Standards Changes:**

Note added to **EM.02.02.07 EP 20:**

- Staff demonstrate knowledge of emergency procedures through participation in drills and exercises, as well as post-training tests, participation in instructor-led feedback (for example, questions and answers), or other methods determined and documented by the organization.

Related **Joint Commission** Standards Changes:

EM.03.01.03 EP 20 (*new*)

- For rural health clinics and **federally qualified health centers**:
- The organization conducts an exercise to test the emergency plan **at least annually**.
- The organization is required to conduct **either one** community-based, full-scale exercise, if available,
- **or** a facility-based, functional exercise, **every other year**.

Related **Joint Commission** Standards Changes:

EM.03.01.03 EP 20 (cont'd)

- In the opposite year, the annual exercise includes, but is not limited to, one of the following:
- A second full-scale, community-based exercise;
- A second facility-based, functional exercise
- Mock disaster drill
- **Tabletop exercise** or workshop, led by a facilitator, includes a group discussion using a narrated, clinically relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.

Related **Joint Commission** Standards Changes:

EM.03.01.03 EP 20: *(notes)*

- **Note 1:** If the organization experiences an actual emergency (natural or man-made) that requires activation of the emergency plan, the organization is exempt from engaging in its next required full-scale, community-based exercise or facility-based, functional exercise following the onset of the emergency event.
- **Note 2:** See the **Glossary** for the definitions of *community-based exercise, full-scale exercise, and functional exercise*.

Related **Joint Commission** Standards Changes:

EM.04.01.01 EP 1 (*revised*)

- For rural health clinics and federally qualified health centers: The organization demonstrates its participation in the development of its system's integrated emergency preparedness program through the following:

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- Documentation that the organization participates in a review **at least every two years** of the system's integrated program

Glossary definitions:

Community-Based Exercise:

- The goal of this exercise is that health care organizations collaborate with state and local entities within their community to promote an integrated emergency response.
- Conducting integrated planning with state and local entities could identify potential gaps in their capabilities that can then be addressed in advance of an emergency.

Glossary definitions:

Full-Scale Exercise:

- An operations-based exercise that tests many facets of preparedness.
- Involves planning and response partners (for example, state and local agencies) and takes place at the health care organization's location using, as much as possible, the individuals and equipment that would be called upon in a real event.
- The emergency operations plan and integration of operational elements are tested in scripted emergency scenarios intended to mimic realistic situations.
- Through this exercise, participants utilize rapid problem solving in high-stress situations.

Glossary definitions:

Functional Exercise:

- An exercise that validates the coordination of the emergency response activities within the organization, including collaboration with planning and response partners.
- It is an operations-based exercise that is action-oriented and designed to validate plans, policies, agreements, and procedures; clarify roles and responsibilities; and identify resource gaps in an operational environment.

Survey process changes related to emergency preparedness:

During the onsite survey session focused on emergency preparedness, surveyors will:

- ✓ Ask to see your EM and communication plans, and check to see if they have been reviewed and updated at least every two years
- ✓ Inquire about your processes to ensure cooperation and collaboration with local, regional, state, and federal emergency preparedness officials
- ✓ Assess whether your EM policies and procedures have been reviewed at least every two years

Survey process changes related to emergency preparedness: (cont'd)

During the onsite survey session focused on emergency preparedness, surveyors will also:

- Assess whether the FQHC has provided emergency preparedness training according to the following intervals:
- Upon initial hire and,
- At least every two years,
- When staff roles or responsibilities change, and
- When emergency preparedness policies and procedures are significantly updated.
- Check for related documentation.

Survey process changes related to emergency preparedness: (cont'd)

During the onsite survey session focused on emergency preparedness, surveyors will also:

- ✓ Ask about the FQHC's process and schedule for **testing** its emergency management plan
- ✓ Check to see if the EM plan is tested at least annually.
- ✓ Assess whether the type of testing conducted alternates each year between:
 - a community-based, full-scale exercise (if available), or a facility-based, functional exercise,
 - And in the opposite year: a full-scale, community-based exercise or facility-based functional exercise, mock disaster drill, or tabletop exercise

- ✓ The standards changes are effective on **March 15, 2020**
- ✓ They are currently posted on our website on the **prepublication standards** page. You can access them via the link below:

<https://www.jointcommission.org/standards/prepublication-standards/revisions-related-to-cms-final-rules/>

- ✓ For more background on **CMS' EM changes** go to:

<https://www.cms.gov/newsroom/fact-sheets/omnibus-burden-reduction-conditions-participation-final-rule-cms-3346-f>

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