

EMERGENCY PREPAREDNESS

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CMS Releases New Information On Emergency Preparedness Requirements

The Centers for Medicare & Medicaid Services has issued new information on the training and testing [requirements](#) for its emergency preparedness final rule. The [rule](#) went into effect last year, and all applicable facilities must be in full compliance with the rules by Wednesday, Nov. 15.

“In order to meet these requirements, we strongly encourage providers and suppliers to seek out and to participate in a full scale, community-based exercise with their local and/or state emergency agencies and health care coalitions and to have completed a tabletop exercise by the implementation date,” the agency wrote. “We realize that some providers and suppliers are waiting for the release of the interpretive guidance to begin planning these exercises, but that is not necessary nor is it advised. Providers and suppliers that are found to have not completed these exercises, or any other requirements of the final rule upon their survey, will be cited for noncompliance.”

The rule requires health care facilities to meet the following four standards:

1. **Emergency plan:** Based on a risk assessment, develop an emergency plan using an all-hazards approach focusing on capacities and capabilities that are critical to preparedness for a full spectrum of emergencies or disasters specific to the location of a provider or supplier.
2. **Policies and procedures:** Develop and implement policies and procedures based on the plan and risk assessment.
3. **Communication plan:** Develop and maintain a communication plan that complies with both federal and state law. Patient care must be well coordinated within the facility, across health care providers, and with state and local public health departments and emergency systems.
4. **Training and testing program:** Develop and maintain training and testing programs, including initial and annual trainings, and conduct drills and exercises or participate in an actual incident that tests the plan. Facilities unable to complete a full scale community exercise by the deadline will have to finish an individual facility-based exercise and give proof as to why the full scale exercise couldn't be done. For those having trouble meeting the new rule, CMS has provided related resources.

Recently, CMS posted a [table](#) outlining requirements by each of the 17 provider types affected. In addition, FAQs from training sessions [round one](#), [round two](#), [round three](#) and [round four](#) are posted. MHA continues working with local and national agencies to clarify regulatory questions surrounding

compliance, as well as provide materials for its hospitals to use in their compliance efforts.

CMS is hosting a telephone conference at 1:30 p.m. Thursday, April 27, to discuss implementation of the [final rule](#), including an overview of the regulation, and training and testing requirements. A Q&A session will follow. More information and the registration link is available on CMS' [website](#).

MHA continues to update [MHANet](#) with timely and related CMS resources.

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