



New CMS Emergency Preparedness Final Rule

The Centers for Medicare and Medicaid Services (CMS) issued a final rule that went into effect on November 16, 2016 requiring any long-term care facility registered with Medicare and Medicaid to be in compliance with federal emergency regulatory preparedness requirements within one year, or by **November 15, 2017**. Compliance is required for participation in Medicare and Medicaid programs.

Medicare and Medicaid participating long-term care facilities are required to meet four key elements:

- **Emergency Plan:** Develop an emergency plan based on a risk assessment utilizing an “all-hazards” approach. The emergency plan must be reviewed and updated at least annually.
- **Policies and Procedures:** Develop and implement policies and procedures based on the emergency plan and risk assessment that are reviewed and updated at least annually. Policies and procedures must address the provision of subsistence needs for staff and patients, the tracking of staff and patients, evacuation, sheltering in place, medical documentation, the use of volunteers, arrangements with other facilities and roles under a waiver declared by the Secretary.
- **Communications Plan:** Develop and maintain a communications plan that complies with federal, state and local laws. The communications plan must be reviewed and updated at least annually. The facility must coordinate patient care within the facility, across healthcare providers, and with state and local public health departments and emergency management agencies.
- **Training and Testing Program:** Develop and maintain emergency preparedness training and testing programs, including initial training in policies and procedures. The training program must demonstrate staff knowledge of emergency procedures and provide emergency preparedness training at least annually. The facility must also conduct drills and exercises to test the emergency plan at least annually.

Additional facility-related elements addressed in the CMS emergency preparedness rule include emergency and standby power system implementation, inspection, testing and maintenance requirements; generator location requirements; and a plan for facilities that maintain an onsite fuel source to power emergency generators.

Karste Consulting Services

Karste Consulting Inc. is an emergency and disaster preparedness consulting firm that specializes in emergency management planning and training services for cities, schools and large and small organizations in and around the San Francisco Bay Area. We consider each client's unique circumstances to develop an emergency preparedness program that meets the needs of its organization and provide leadership and staff with the tools and resources to reduce the threat to life and property during an emergency or a disaster. Our Mission is to help your facility implement the new Medicare and Medicaid emergency preparedness requirements and meet the compliance deadline of **November 15, 2017**.

Our Approach

Karste Consulting Inc. offers a full suite of [Emergency Management Planning and Training Services](#) designed to help your facility implement the new Medicare and Medicaid emergency preparedness requirements and provide leadership and staff with the tools and resources to reduce the threat to life and property during an emergency or a disaster. We will work with your staff to do the following:

- Perform a risk assessment for all areas of your facility utilizing an “all-hazards” approach.
- Determine CMS emergency preparedness compliance gaps.
- Develop an emergency plan based on the risk assessment and/or review your current plan and make recommendations for updates.
- Develop and implement policies and procedures based on the emergency plan and risk assessment and/or review your current policies and procedures and make recommendations for updates.
- Develop a communications plan and/or review your current plan and make recommendations for updates.
- Conduct on-site training for new and existing staff in order to review key elements of the emergency plan, policies and procedures and communications plan.
- Conduct an on-site Tabletop Exercise with new and existing staff in order to test and evaluate the effectiveness of the emergency plan.
- Provide your facility with additional tools and resources to maintain full compliance.

For more information, please contact Karste Consulting's Independent Consultant Nick Zubel for a Free Phone Consultation at 510 529-5631 or via email at nzubel@gmail.com

CMS Resource List

Centers for Medicare and Medicaid Services (CMS) Final Rule: [“Medicare and Medicaid Programs; Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers”](#)

[The CMS Emergency Preparedness Survey and Certification Page](#)

Association of Healthcare Emergency Preparedness Professionals (AHEPP): [AHEPP CMS Emergency Preparedness Rule Resources](#)

[CMS Emergency Preparedness Acronym and Glossary List](#)

HHS Assistant Secretary for Preparedness and Response (ASPR) Technical Resources, Assistance Center, and Information Exchange (TRACIE): [Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers](#)