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How to Avoid the Top 10 Emergency Preparedness Deficiencies Cited in Texas – FY 2018

**2019 Emergency Preparedness Coalition Symposium
Galveston, TX
October 9 – 11, 2019**

Objectives

- Become aware of the top 10 Emergency Preparedness Deficiencies cited in Fiscal Year 2018 – HHSC Regulatory Services in Texas
- Meet the Conditions of Participation as per the State Operations Manual, Appendix Z; effective 03/04/2019
- Analyze your facility's current level of Emergency Preparedness Plan (EPP)
- Learn opportunities for improvement in your EPP



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Role of Regulatory Services

- Mission
- Vision
- Oversight



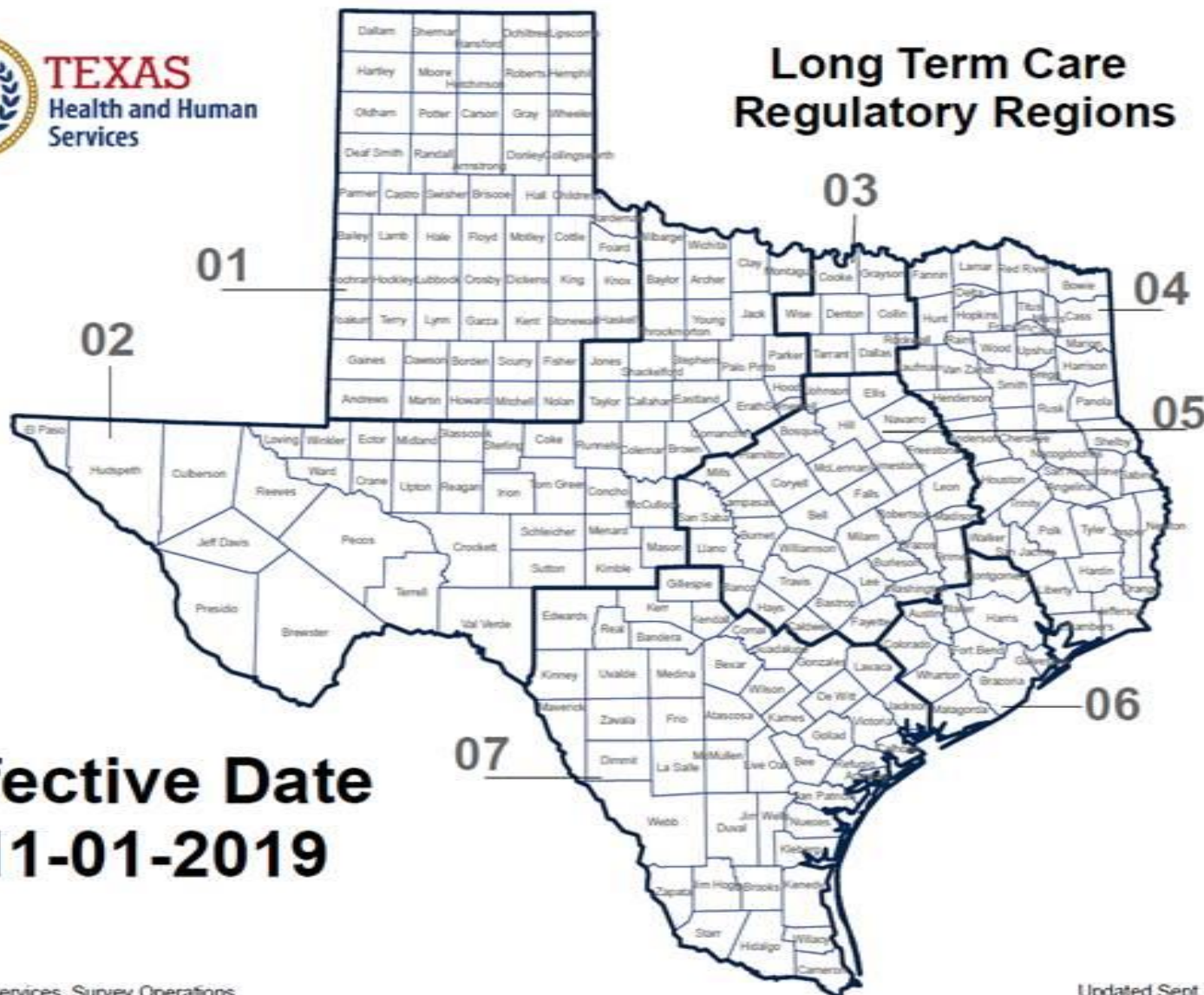
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Long Term Care Regulatory Regions



Data Source:
HHS Regulatory Services, Survey Operations

Updated Sept. 14, 2019



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Federal Regulations



- The federal regulations governing NFs on Emergency Preparedness are found in 42 Code of Federal Regulations, Part 483.
- The Centers for Medicare and Medicaid Services (CMS) provide the regulations, along with guidance in the State Operations Manual, Appendix Z- Emergency Preparedness for All Provider and Certified Supplier Types, Interpretive Guidance, Table of Contents,
(Rev.186, Issued: 03-04-19)

https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107a_p_z_emergprep.pdf



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National Nursing Home Top 10 for Emergency Preparedness Surveys

2018	Description for most recent year	# Cites	% Cited
E-0039	EP Testing Requirements	1068	6.70%
E-0015	Subsistence Needs for Staff and Patients	842	5.30%
E-0026	Roles Under a Waiver Declared by Secretary	746	4.70%
E-0036	EP Training and Testing	646	4.10%
E-0024	Policies/Procedures-Volunteers and Staffing	618	3.90%
E-0001	Establishment of the Emergency Program (EP)	515	3.20%
E-0035	LTC and ICF/IID Sharing Plan with Patients	477	3.00%
E-0041	Hospital CAH and LTC Emergency Power	473	3.00%
E-0037	EP Training Program	468	3.00%
E-0013	Development of EP Policies and Procedures	442	2.80%

Report run date 01/07/2019

*Emergency Preparedness regulations went into effect on 11/16/2016. However, surveys started on 11/15/2017.

% Cited = % of providers surveyed that were cited



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Texas Nursing Home Top 10 for Emergency Preparedness Surveys

2018	Description for most recent year	# Cites
E-0039	EP Testing Requirements	272
E-0004	Develop EP Plan, Review and Update Annually	135
E-0009	Local, State, Tribal Collaboration Process	132
E-0006	Plan Based on All Hazards Risk Assessment	114
E-0036	EP Training and Testing	106
E-0001	Establishment of the Emergency Program (EP)	103
E-0007	EP Program Patient Population	72
E-0015	Subsistence Needs for Staff and Patients	70
E-0024	Policies/Procedures-Volunteers and Staffing	66
E-0013	Development of EP Policies and Procedures	65

Report run date 09/27/2019

*In FY2018, Texas LTCR cited 1,713 E-Tags across the entire state.

588 unique nursing facilities received at least one E-Tag deficiency.



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Houston Nursing Home Top 10 for Emergency Preparedness Surveys (Region 06)



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2018	Description for most recent year	# Cites
E-0039	EP Testing Requirements	60
E-0006	Plan Based on All Hazards Risk Assessment	43
E-0004	Develop EP Plan, Review and Update Annually	33
E-0036	EP Training and Testing	31
E-0037	Emergency Preparedness (EP) Training Program	20
E-0031	Emergency Officials Contact Information	8
E-0025	Arrangement with Other Facilities	6
E-0030	Patients Names and Contact Information	4
E-0009	Local, State, Tribal Collaboration	2
E-0001	Establishment of the Emergency Program	2
Report run date 09/27/2019		
*In FY2018, Texas LTCR cited 1,713 E-Tags across the entire state.		
588 unique nursing facilities received at least one E-Tag deficiency.		

Emergency Preparedness Testing Requirements | 1st

42 CFR §483.73(D) (2)

TAG E-0039

The LTC facility must do the following:

- Participate in a full scale exercise that is community based or an individual facility based
- Conduct an additional exercise
 - A full scale exercise or
 - A tabletop exercise

Analyze & Document with an After Action Report
Revise the Emergency Plan as needed.

Exception: Activation of the EP due to actual emergency exempts the facility from the full scale exercise.



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How to avoid E-0039

Emergency Preparedness Testing Requirements

- Join the Regional Health Care Coalition (RHCC) to participate in exercises.
 - Some RHCC Corridor meetings host tabletop exercises.
 - The RHCC hosts tabletop & full scale exercises annually
- Check with the following to request participation in their exercises
 - Local Health Department, Local Office of Emergency Management
 - Oil Refineries, Nuclear Power Plants
- Participate with sister facilities in other regions/the same city in their exercises.
- DIY exercises: Learn how to host tabletop exercises, invite community partners.
- Check with your local police department regarding Active Shooter training/table top/full scale exercises.
- Check with your local fire department for Fire Safety training/table tops/full scale exercises



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Nursing Home in a Table Top Emergency Drill Scenario

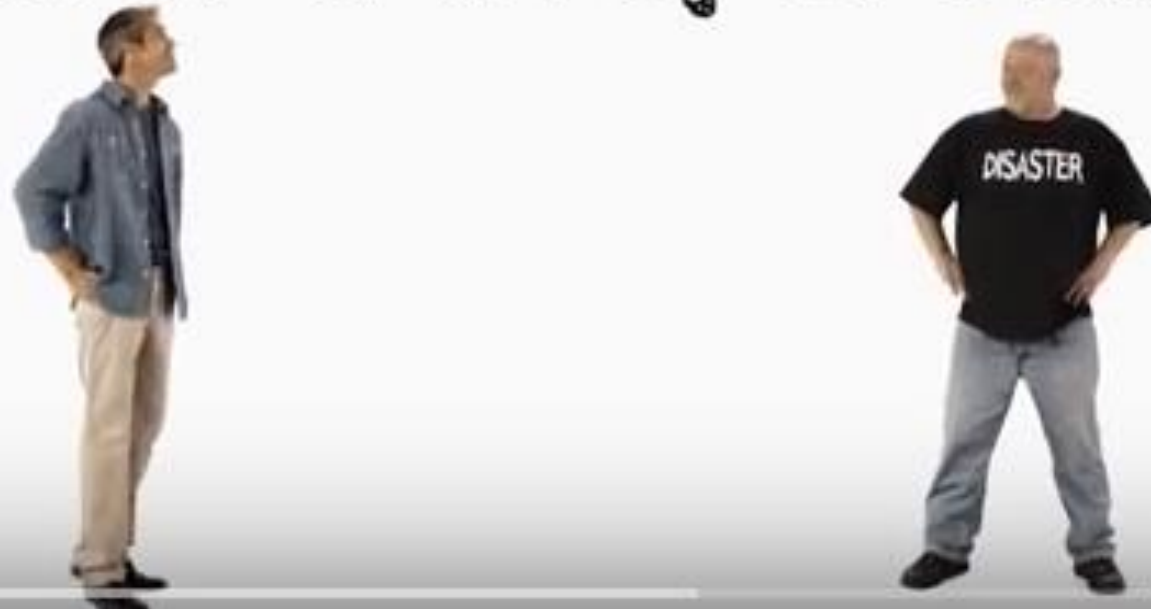


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Meet Disaster & Preparedness

a tale of
Disaster & Preparedness



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<https://www.bing.com/videos/search?q=emergency+preparedness+videos+fre&&view=detail&mid=D40190591BF9E44BDF8BD40190591BF9E44BDF8B&&FORM=VRDGAR>

Plan Based on All Hazards Risk Assessment | 2nd

42 CFR §483.73(A) (1)- (2)

TAG E-0006

[(a) Emergency Plan. The [facility] must develop and maintain an emergency preparedness plan that must be reviewed, and updated at least annually. The plan must do the following:]

(1) Be based on and include a documented, facility-based and community-based risk assessment, utilizing an all-hazards approach.*

***[For LTC facilities at §483.73(a)(1):] (1) Be based on and include a documented, facility-based and community-based risk assessment, utilizing an all-hazards approach, including missing residents.**

(2) Include strategies for addressing emergency events identified by the risk assessment



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All Hazards/Risks



Hurricane



Flood/Flash Flood



Tornado



Winter Storm



Drought



Hazmat/Chemical



Oil Spill



Urban Fire



Water Shortage



Utility Outages



Civil Disturbance



Power Outage



Rail Accident



Disease



Economic Loss



Communications



Mass Fatality



Subsidence



Terrorism



Wildfire



Earthquake



Building Collapse



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How to avoid E-0006

Plan Based on All Hazards Risk Assessment (HVA)

BEST PRACTICES:

- Use computerized all hazard risk assessment aka Hazard Vulnerability Assessment (HVA's), but remember the Texas Emergency Preparedness regulations require a printed copy of your disaster plan, which includes the risk assessment in your disaster plan.
- Regional Health Care Coalitions can provide templates for Risk Assessments
- Check with your Office of Emergency Management (OEM) for the risks in your geographic area (See the next slide for an example)



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Office of Emergency Management – City of Houston

NATURAL HAZARDS

- [Extreme Heat](#)
- [Cold Weather](#)
- [Flooding](#)
- [Hurricanes & Tropical Storms](#)
- [Severe Thunderstorms](#)
- [Tornadoes](#)
- [Wildfires](#)



MAN MADE HAZARDS

- [Active Shooters](#)
- [Hazardous Materials & Chemical Emergencies](#)
- [Public Health Emergencies](#)
- Radiological Emergencies
- [Structure Fires](#)
- [Terrorism](#)
- [Utility Outages](#)

<https://www.houstonoem.org/houstons-hazards/>



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Risk Assessment aka Hazard Vulnerability Assessment (HVA)

Hazards - Enter name of hospital

Hazard and Vulnerability Assessment Tool

Naturally Occurring Events

[illegible]

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NFPA 99 Systems Risk Assessment Tool



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Category Legend			Chapter 5				Chapter 6				Chapter 7				Chapter 8								Chapter 9			Chapters 10 and 11	Chapter 12
Room Name	Room #	Space	Oxygen	Medical Air	Vacuum	WAGD	Electrical Systems				Data	Phone	Nurse Call	Cable TV	Potable Water	Non-Potable Water	Water Heating	Water Conditioning	Non-Medical Compressed Air	Black Waste Water	Gray Waste Water	Clear Waste Water	Heating	Ventilation	Air-Conditioning	Equipment (See Equipment tab.)	Emergency Management (See Emergency Management tab.)
REHABILITATION			3	na	na	na	4	4	4	2	4	4	4	4	4	4	4	na	na	na	na	na	3	3	3		
DEMENTIA / ALZHEIMER'S			3	na	na	na	4	4	4	2	4	4	4	4	4	4	4	na	na	na	na	na	3	3	3		
RESPIRATORY			2	na	na	na	2	4	4	2	4	4	4	4	4	4	4	na	na	na	na	na	2	2	2		
WOUND CARE			4	na	na	na	4	4	4	2	4	4	4	4	4	4	4	na	na	na	na	na	3	3	3		
BEHAVIOR / MENTAL HEALTH			4	na	na	na	4	4	4	2	4	4	4	4	4	4	4	na	na	na	na	na	3	3	3		

Example of E-0006 Citation

Plan Based on All Hazard Risk Assessment

Based on record review of the facility Emergency Preparedness Plan (EPP) and interview on (date/time) with the administrator, it was determined that the facility failed to include a potential for missing residents within the documented, facility-based and community-based risk assessment.

This deficient practice was evidenced by:

1. A review of the facility's EPP revealed that the plan included a documented facility based and community-based risk assessment, utilizing an all- hazards approach.
2. The risk assessment did not include a risk assessment for missing residents.
3. In an interview at (date/time), the administrator was notified of the missing information.



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All Hazards Risk Assessment – definition revised 03/04/2019

1. CMS has added emerging infectious diseases (EID) to the definition of all hazards approach, effective 03/04/2019.
- Examples of EID are:
 - Ebola Virus
 - Zika Virus
 - Influenza



Zika Virus is spread by daytime-active Aedes mosquitoes

Ebola Virus is a hemorrhagic fever of humans & primates caused by ebolaviruses.

"Planning for using an all hazards approach should also include emerging infectious disease threats".

Reference:

State Operations Manual, Appendix Z- Emergency Preparedness for All Provider and Certified Supplier Types, Interpretive Guidance, Table of Contents, Issued 03-04-2019 - Definitions



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Develop EP Plan, Review & Update Annually | 3rd

42 CFR §483.73(D)

TAG E-0004

The facility must comply with all applicable **Federal**, **State**, and **local** emergency preparedness requirements. The facility must develop, establish and maintain a comprehensive emergency preparedness program that meets the requirements of this section.

- (a) Emergency Plan. The facility must develop and maintain an emergency plan that must be reviewed, and updated at least annually.



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Texas Emergency Preparedness and Response Requirements

8 Core Elements

- (1) Direction and control
- (2) Warning.
- (3) Communication
- (4) Sheltering Arrangements
- (5) Evacuation
- (6) Transportation
- (7) Health and Medical Needs
- (8) Resource Management

40 Texas Administrative Code §19.1914 Nursing Facility Requirements for Licensure and Medicaid Certification – Subchapter T – Emergency Preparedness and Response Requirements

[https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=40&pt=1&ch=19&rl=1914](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=40&pt=1&ch=19&rl=1914)



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How to avoid E-0004

Develop EP Plan, Review & Update Annually

BEST PRACTICE:

- Revise the plan within 30 days after information in the plan changes as per the state regulations at 40 TAC RULE §19.1914 (b) (4) of the Nursing Facility Requirements for Licensure and Medicaid Certification. *
- Designate a facility staff member to review/update the contacts: family/responsible party, staff, etc., with changes a scheduled basis and as needed and document

BEST PRACTICE:

- Have a policy and procedure attached to each identified facility risk.

BEST PRACTICE:

- Update/Review the plan after each tabletop and full scale exercise, complete an after action report (AAR), document, in-service staff on changes.

*Nursing Facility Requirements for Licensure and Medicaid Certification

[https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=40&pt=1&ch=19&rl=1914](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=40&pt=1&ch=19&rl=1914)



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EP Training and Testing | 4th

42 CFR §483.73(D)

TAG 0036

The 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 © of this section. The training and testing program must **be reviewed and updated at least annually**.



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How to avoid E-0036

EP Training and Testing

1. *BEST PRACTICES*: For example, a facility that identifies **flooding** in the **facility risk assessment** should also include **policies and procedures** in their emergency plan for closing or evacuating their facility and include this in their training and testing program.

a. Include:

- a. How to **communicate** the facility closure/evacuation to required individuals/agencies
- b. Testing resident tracking systems
- c. Testing transportation procedures for safe evacuation
- d. Drills to identify gaps in knowledge



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Emergency Preparedness (EP) Training Program | 5th

42 CFR §483.73(d)(1),

E-0037

Training Program. The facility must do all of the following:

- (1) 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 role.
- (2) Provide emergency preparedness training at least annually.
- (3) Maintain documentation of all emergency preparedness training
- (4) Demonstrate staff knowledge of emergency preparedness



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How to avoid E-0037

Emergency Preparedness Training Program

BEST PRACTICE: Modify the annual training each year to incorporate any lessons learned from the most recent exercises, real life emergencies that occurred in the last year, and during the annual review of the facility's emergency program.

- a. For example: Annual training could include training staff on new evacuation procedures that were identified as a best practice and documented in the facility After Action Report.



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Emergency Officials Contact Information | 6th

42 CFR §483.73 (c) (2)

E-0031



The facility 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 annually.

The communication plan must include all of the following:

- (1) Federal, State, tribal, regional, and local emergency preparedness staff
- (2) The State Licensing and Certification Agency
- (3) The Office of the State Long-Term Care Ombudsman
- (4) Other sources of assistance



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Sheltering in Danger



This photo of residents at the La Vita Bella Assisted Living Facility in waist-deep water drew widespread attention to the plight of senior citizens after the 2017 landfall of Hurricane Harvey in Texas. Photo: Trudy Lampson, Source:

<http://www.twincities.com/2017/08/28/residents-in-viral-photo-of-flooded-houston-nursing-home-are-doing-fine>



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Sheltering in Danger



Sheltering in Danger – An Investigative Report by the Minority Staff of the U.S. Senate Committee on Finance - How Poor Emergency Planning and Response Put Nursing Home Residents at Risk During Hurricane Harvey and Irma – November 2018

[https://www.finance.senate.gov/imo/media/doc/Sheltering%20in%20Danger%20Report%20\(2%20Nov%202018\).pdf](https://www.finance.senate.gov/imo/media/doc/Sheltering%20in%20Danger%20Report%20(2%20Nov%202018).pdf)



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How to avoid E-0031

Names and Contact information

Best practices: Here's the information.

1. **Federal:** CMS Regional Office - Region 06 (Dallas)
 - a. Fred Schuster, Regional Director (effective: 12/17/2018)
 - Phone: 214-767-3301
2. **Local:** Office of Emergency Preparedness for your county/city
 - a. Name and contact information for the local emergency management coordinator (EMC)
3. **Regional:** Register your facility with EM Resource
 - a. Hilal Salami; SETRAC Preparedness Coordinator, Special Populations
 - Phone/E-mail: (281) 822-4443 | hilal.salami@setrac.org
 - Main number: [Office: \(281\) 822-4444](tel:(281)822-4444)
4. **State Licensing and Certification Agency:**
 - a. Mark Kendall, HHSC Regional Director, Regional 06 (Houston)
 - Phone/E-mail: 713-767-2291 | mark.kendall@hhsc.state.tx.us
 - Main number: 713-767-2200 to contact assigned Program Manager if unknown
5. **Office of the State LTC Ombudsman**
 - Patty Duceyet
(512) 438-4356 | Patricia.Ducayet@hhsc.state.tx.us
 - Local Ombudsman:
 - Call 1-800-252-2412 for contact information



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Arrangements with Other Facilities | 7th

42 CFR §483.73 (B)

E-0025

The facility must develop arrangements with other facilities and other providers to receive patients in the event of limitations or cessation of operations to maintain the continuity of services to facility patients.



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How to avoid E-0025

Arrangements with other Facilities

1. *BEST PRACTICE:* Have written contracts
 - a. Review and/or renew at least annually, especially with a new administrator.
2. *BEST PRACTICE:* Find out how many other facilities have contracts with the same facility.
3. *BEST PRACTICE:* Have a back up plan to the back up plan.
4. *BEST PRACTICE:* Have short-term and long-term evacuation destinations.
4. *BEST PRACTICE:* Become a member of the Regional Healthcare Coalition. Register with EMResource, which lists all facilities in Region 06 along with their bed availability. (See next slide for registration details)



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How to avoid E-0025

Arrangements with other Facilities

Best Practice: Register with EMResource

EMResource is an interoperable day to day and Emergency system that streamlines communications and notifications required to prepare for, respond to, and recover from individual and large-scale disasters for the entire emergency services and healthcare spectrum.

Benefits of EMResource for your Facility

1. Ability to update facility status (including resources) and provide a bed report online
2. Ability to view the status of other long-term facilities, hospitals region wide
3. Ability to view type and availability of beds in LTC facilities during disaster
4. Available via mobile app
- 5. FREE** for your facility



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How to avoid E-0025

Arrangements with other Facilities

Best Practice: Register with EMResource

Long Term Care																
show map print excel refresh help																
+	Assisted Living Facility	Status	Licensed Beds	Female (semi)	Male (semi)	Either (semi)	Private	SNF Female (semi)	SNF Male (semi)	SNF Either (semi)	SNF Private	Secured Female (semi)	Secured Male (semi)	Secured Either (semi)	Secured Private	Comment
+	ICF/IID	Status	Licensed Beds	Female (semi)	Male (semi)	Either (semi)	Private	Secured Female (semi)	Secured Male (semi)	Secured Either (semi)	Secured Private	Comment				
-	Nursing Homes		Status	Licensed Beds	Female (semi)	Male (semi)	Either (semi)	Private	SNF Female (semi)	SNF Male (semi)	SNF Either (semi)	SNF Private	Secured Female (semi)	Secured Male (semi)	Secured Either (semi)	Secured Private
	VIBRALIFE OF KATY - SNF		Open	70	0	0	30	10	0	0	41	22	0	0	0	0
	ACCEL AT HERMANN PARK-676354		--	--	--	--	--	--	--	--	--	--	--	--	--	--
	AFTON OAKS NURSING CENTER-455682		Open	169	7	8	169	10	84	85	169	10	0	0	0	0
	ALLENBROOK HEALTHCARE CENTER-675079		--	--	--	--	--	--	--	--	--	--	--	--	--	--
	ASHFORD GARDENS-675423		--	--	--	--	--	--	--	--	--	--	--	--	--	--
	AVALON PLACE WHARTON-455699		--	--	--	--	--	--	--	--	--	--	--	--	--	--
	BAY VILLA HEALTHCARE CENTER-455582		--	--	--	--	--	--	--	--	--	--	--	--	--	--
	BAYOU MANOR-676282		Open	37	1	1	0	2	0	0	10	0	0	0	0	0

EMResource User request:

<https://form.jotform.us/70684513640152>



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View of facility in EMResource

 CLAREWOOD HOUSE EXTENDED CARE CTR-676021

[back to view](#) 

Type: Nursing Homes

Address: 7400 CLAREWOOD DR
HOUSTON, TX 77036

County: Harris

Lat/Longitude: 29.710642 / -95.514638

**EMResource/AHA
ID:** 134722 /

Website: www.clarewoodhouse.com (opens new window)

Contact: Patrick Pheifer

Contact Title: Executive Director

Phone 1: 8325499387

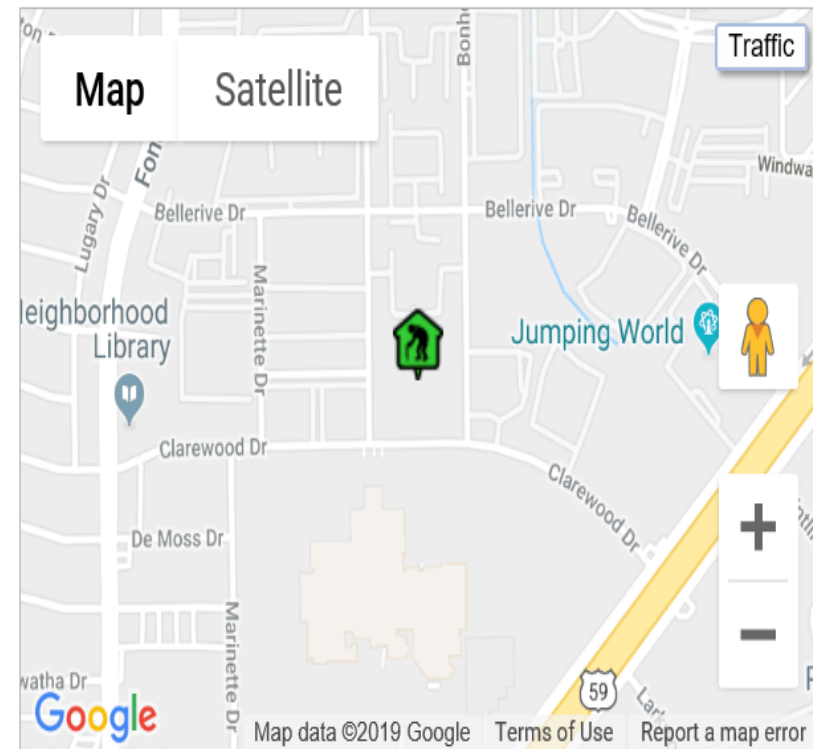
Phone 2: 713-774-5821 ext 211

Fax: 713-778-8503

Email: patrick@clarewoodhouse.com

Notes:

 [larger map / driving directions](#) (opens new window)



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Names and Contact Information | 8th

42 CFR §483.73 (c) (1)

E-0030

The facility failed to ensure the communication plan included all of the following: Names and contact information for Staff. Entities providing services under arrangement. Patients' physicians, other facilities and Volunteers.



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How to avoid E-0030

Names and Contact information

Have a procedure (designee/frequency) for maintaining current information.

Current list of:

- Telephone numbers for residents' responsible parties
- Current list of telephone numbers for pre-arranged receiving facilities
- Current list of telephone numbers for facility staff

Identify the location of the lists described above



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Local, State, Tribal Collaboration Process | 9th

42 CFR §483.73 (a) (4)

E-0009

– The facility, failed to include a process 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, including documentation of the facility's efforts to contact such officials and when applicable of its participation in collaborative and cooperative planning efforts.



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How to avoid E-0009

Local/State/Tribal Collaboration Process

1. Local: Office of Emergency Management
2. Regional: Joint your Regional Advisory Council
 - a. SETRAC CMOC (Catastrophic Medical Operations Center)
On Duty Call officer: 281- 822-4444, option 2
(Facility Request for Activation)
3. State: Complete Form 1085 – (STEAR) annually
State of TX Emergency Assistance Registry
<https://hhs.texas.gov/sites/default/files/documents/laws-regulations/forms/1085/1085.pdf>
4. Federal: Have the contact information
 - a. CMS Regional Office - Region 06 (Dallas)
 - Includes:
 - Arkansas, Louisiana,
 - New Mexico, Oklahoma, **Texas**

CMS Regional Office E-mail RODALDSC@cms.hhs.gov

Form 1085
March 2013.0

Texas Department of Aging
and Disability Services

State of Texas Emergency Assistance Registry (STEAR)

Contact Information for Data Collector

Organization:	Contact Name:
Contact Area Code and Telephone No.	Contact Email:

STEAR Facility Registration Form – For use by assisted living facilities, nursing homes, etc.
One form should be completed for each facility.

1. Name of the facility	
2. Street address	Apt/Suite No.
3. City	
4. ZIP code	
5. County	
6. Contact area code and telephone	
7. Estimated daily average census	
8. Do you have an evacuation plan for your facility residents if there is an emergency? <input type="checkbox"/> Yes <input type="checkbox"/> No	
9. Are there any additional comments or notes I should enter into your record?	

Fac completed form to 888-857-1074

Forms can be filed electronically using Adobe Reader or Acrobat and saved as uniquely named PDF files.

Provider Letter 13-08 – Registration with the State of Texas Emergency Assistance Registry (**Replaces Provider Letter 09-20**)

- a. <https://apps.hhs.texas.gov/providers/communications/2013/letters/PL2013-08.pdf>



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Establishment of the Emergency Program | 10th

42 CFR §483.73 E-0001

The [facility, except for Transplant Center] must comply with all applicable Federal, State and local emergency preparedness requirements. The [facility] must establish and maintain a [comprehensive] emergency preparedness program that meets the requirements of this section.* The emergency preparedness program must include, but not be limited to, the following elements:

Risk Assessment and Planning
Policies and Procedures
Communication Plan
Testing and Training

Four Provisions for All Provider Types



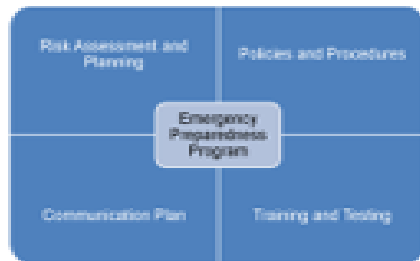
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Why It's Different Program versus Plan

Emergency Preparedness Program E-0001

A program is a group of related projects managed in a coordinated way to obtain benefits..."**

An emergency preparedness program develops, implements, and maintains plans to provide for the health, safety, and welfare of residents in an emergency or disaster.



Emergency Preparedness Plan E-0004

A plan is defined as a strategy, a proposal, a blueprint

An emergency preparedness plan is a comprehensive all hazard plan that addresses emergencies identified by a risk assessment.

It *has not* been activated



**Dequire, M. (2012). In the eyes of the beholder. Paper presented at, Canada. Newtown Square, PA: Project Management Institute® Global Congress 2012—North America, Vancouver, British Columbia.

In Summary....

Key Ingredients for Avoiding the Top 10 Emergency Preparedness Citations

- Join your Regional Healthcare Coalition
- Compliance with the 4 core elements of the CMS Disaster Plan requirements
- Compliance with the 8 core elements as described in the TX state emergency preparedness regulations.
- Maintain a robust training plan for staff.
- Stay current with changes to the regulatory requirements



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In Summary....

Key Ingredients for Avoiding the Top 10 Emergency Preparedness Citations

Joint Training – Free & provides CEU's

Emergency Preparedness: This course provides guidance that a registered nurse, a licensed vocational nurse, a social worker, and other staff members can use to develop a disaster plan. You will learn the basic steps of emergency preparedness (including risk assessment and plan development) and the eight core functions of a disaster plan. You will also learn the federal requirements for emergency preparedness. The course applies to nursing homes, assisted living facilities, intermediate care facilities for persons with an intellectual disability or related conditions, day activity and health services providers, PPECCs, and HCSSAs.

To request, contact: JointEd.Services@hhsc.state.tx.us.



In Summary....

Key Ingredients for Avoiding the Top 10 Emergency Preparedness Citations

Joint Training – Free & provides CEU's

NF Course - Life Safety Code and Maintenance of Nursing Facilities: This course helps participants maintain their fire alarm, sprinkler, and HVAC systems. While many of the facility staff can gain from this class, the information is especially suited for the maintenance staff. Other modules discuss the maintenance of a building's construction type, smoke barriers, and corridor doors. Commercial cooking equipment, medical gas, and exit requirements are also discussed.

To request, contact: JointEd.Services@hhsc.state.tx.us.



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Key Ingredients for Avoiding the Top 10 Emergency Preparedness Citations

CDC Training: Emergency Preparedness and Response

The purpose of Clinician Outreach and Communication Activity (COCA) Calls/Webinars is to increase clinicians' knowledge and competencies of threats to the public's health, their effects on human populations, and evaluation and management strategies of these threats. COCA continuing education is free.

https://emergency.cdc.gov/coca/calls/2019/callinfo_102419.asp

CDC Train – Zika Training Activities

<https://www.train.org/cdctrain/search?type=course&query=Zika,%20Dengue,%20chikungunya,%20malaria>



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Questions & Answers





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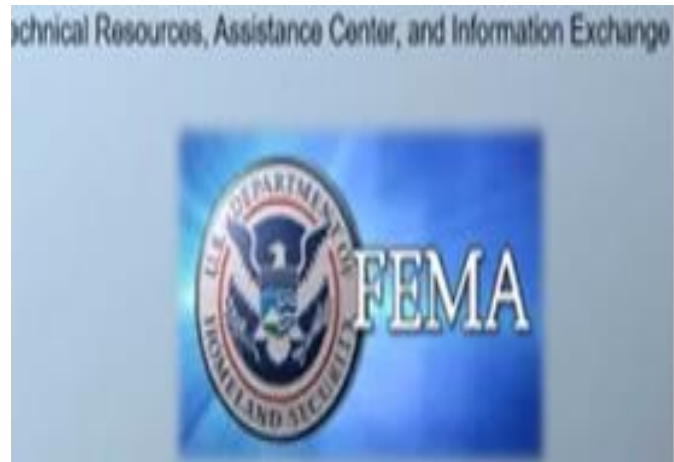
Special Thanks to the following contributors

- Mark Kendall, HHS Regional Director, Regulatory Services Division (RSD), Region 06
- Mark Smith, HHS Life Safety Code Program Manager, RSD, Region 06
- Brian Beeson, Manager, Data Management and Analysis, RSD, Austin, TX
- Dario Connors, Program Specialist, Data Management and Analysis RSD, Austin, TX

Resources



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Emergency Preparedness References

1. New York Should Improve Its Oversight of Selected Nursing Homes' Compliance with Federal Requirements for Life Safety and Emergency Preparedness. August 2019, JoAnne M. Chiedi, Acting Inspector General. Inquiries regarding this report may be addressed to

Public_Affairs@oig.hhs.gov

2. State Operations Manual, Appendix Z- Emergency Preparedness for All Provider and Certified Supplier Types, Interpretive Guidance, Table of Contents, Issued 03-04-2019

https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_z_emergprep.pdf



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3. Sheltering in Danger – An Investigative Report by the Minority Staff of the U.S. Senate Committee on Finance- How Poor Emergency Planning and Response Put Nursing Home Residents at Risk During Hurricane Harvey and Irma – November 2018

[https://www.finance.senate.gov/imo/media/doc/Sheltering%20in%20Danger%20Report%20\(2%20Nov%202018\).pdf](https://www.finance.senate.gov/imo/media/doc/Sheltering%20in%20Danger%20Report%20(2%20Nov%202018).pdf)

4. Nursing Home Incident Command System from California Association of Health Facilities Disaster Preparedness Program

<https://www.cahfdisasterprep.com/nhics>

5. MLN Connects - National Provider Call Program- Centers for Medicare and Medicaid Services-2017-04-27 – Understanding the Emergency Preparedness Final Rule and Testing and Training Requirements

<https://www.cms.gov/Outreach-and-Education/NPC>



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Centers for Medicare and Medicaid Services. (2013). Emergency Preparedness Checklist: Recommended Tool for Effective Health Care Facility Planning.

<https://asprtracie.hhs.gov/technical-resources/resource/552/emncy-preparedness-checklist-recommended-tool-for-effective-health-care-facility-planning>

This document is an emergency preparedness checklist intended for all healthcare facilities. It can help these facilities, including long-term care facilities, determine their level of preparedness and action steps. (Note: this resource pre-dates the final Emergency Preparedness Rule.)



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Healthcare System Readiness for Highly Pathogenic Infectious Diseases

<https://files.asprtracie.hhs.gov/documents/netec-aspr-tracie-highly-infectious-disease-webinar-12june2018-508.pdf>

ASPR TRACIE: <https://asprtracie.hhs.gov>

Deguire, M. (2012). In the eyes of the beholder. Paper presented at PMI® Global Congress 2012—North America, Vancouver, British Columbia, Canada. Newtown Square, PA: Project Management Institute.

Kaiser Permanente's interactive HVA tool revised January 2017 available at:

<https://www.calhospitalprepare.org/hazard-vulnerability-analysis>



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Federal Emergency Management Agency. (2018).
**Comprehensive Preparedness Guide (CPG) 201: Threat
and Hazard Identification and Risk Assessment (THIRA)
and Stakeholder Preparedness Review (SPR) Guide.**
(Third Edition.)

<https://www.fema.gov/media-library-data/1527613746699-fa31d9ade55988da1293192f1b18f4e3/CPG201Final20180525508c.pdf>

ASHE Risk Assessment Tool

<http://www.ashe.org/resources/riskassessmenttool.shtml>



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Emergency Preparedness References

Meet "Disaster" and "Preparedness" YouTube Video

Produced by the Metropolitan Emergency Managers Committee of Greater Kansas City

- The video was created in cooperation with the Regional Homeland Security Coordinating Committee and funded by the U.S. Department of Homeland Security Urban Area Security Initiative

<https://www.bing.com/videos/search?q=emergency+preparedness+videos+free&&view=detail&mid=D40190591BF9E44BDF8BD40190591BF9E44BDF8B&&FORM=VRDGAR>

40 Texas Administrative Code §19.1914 Nursing Facility Requirements for Licensure and Medicaid Certification – Subchapter T – Emergency Preparedness and Response Requirements

[https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=40&pt=1&ch=19&rl=1914](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=40&pt=1&ch=19&rl=1914)



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Thank You!

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