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CMS EMERGENCY PREPAREDNESS
FINAL RULE

What You Need to Consider to Meet the Criteria

The Centers for Medicare and Medicaid Services, for the first time, have added an Emergency Preparedness Rule that all hospitals and healthcare facilities must meet by November 17, 2017. We have prepared a brief overview of what you should consider as part of your plan but suggest you thoroughly review the final guidelines with your team.

The core elements of the regulation are ones most hospital emergency preparedness teams will recognize:

1. Build an emergency plan
2. Develop and maintain policies and procedures
3. Develop and maintain a communication plan
4. Develop and maintain a training and testing program

The Emergency Preparedness Plan for your hospital or healthcare system is based on an all-hazards risk assessment, the plan must cover the following areas:

- Epidemic/pandemic
- Biological
- Chemical
- Nuclear/radiological
- Explosive-incendiary
- Natural incidents

In addition, the plan must take into account threats possible in the local community, for instance, wildfires in the West or blizzards in northern states. The plan must include a process for interacting with the local community groups such as police, fire, local government, and other nearby healthcare facilities, and other emergency responders.

EMERGENCY PREPAREDNESS REQUIREMENTS

Your plan must meet the following six steps to receive approval from CMS:

- Perform a risk analysis for your facility/facilities
- Establish a plan to address those risks (as listed above)
- Develop procedures and policies to protect against those risks
- Develop a communication plan to support patient, staff and community safety
- Train staff to readily implement the plan

- Test the plan with at least one full-scale exercise and one other exercise which may be another full-scale exercise or a table-top drill review

MEETING COMMUNICATIONS CRITERIA

Everbridge is working closing with several hospital systems and experts in the field to make sure your communication platform will meet the CMS guidelines. We encourage you to review the guidelines with your team, but you should consider the following (quotes are directly from the Federal Register Vol. 81, No. 180 guidelines on the CMS Final Rule):

Speed of Response

> "It is essential that hospitals have the capacity to respond in a timely and appropriate manner in the event of a natural or man-made disaster."

You must respond immediately when an incident occurs. It is important that your communications network be ready to go at the touch of a button. Things to consider are ready-made templates that can be tailored quickly to the specific incident and a communication system that can send out messages via multiple options (mobile, robocalls, text, email, etc). to ensure everyone is reached "in a timely and appropriate manner."

Tailored to Your Population

> "At-risk populations are individuals who may need additional response assistance, including … from diverse cultures, have limited English proficiency, or are non-English speaking."

The messaging you deliver needs to reflect your local population. Perhaps you have a large Hispanic community near your facility – messages may need to be in two or more languages. Again, using prepared templates that require only a few modifications tailored to the incident will ensure your community gets the message and knows how to act on it.

Coordinate with the Local Community for CMS Emergency Response

> "A hospital [must] have a process for ensuring cooperation and collaboration with local, tribal, regional, state, or federal emergency preparedness officials' efforts to ensure an integrated response during a disaster or emergency situation."

Hospitals are often at the center of their communities when it comes to the health of the local population. During a crisis, patients may appear in the Emergency Department seeking aid. The local community of police, fire, EMTs, state and local officials need to know if your hospital is available to take patients or if it needs to be evacuated. You'll likely need to work with other hospitals to be able to send or receive patients during an event.

You'll need two levels of communication in this regard:

- The ability to communicate easily with off-hospital coordinators to send and receive information
- The ability to remain HIPAA-compliant in regards to patient information as patients are incoming or being evacuated

Requirement to Track Patients and Staff

"Providers [must] develop policies and procedures regarding a system to track the location of staff and patients in the hospital's care both during and after an emergency."

Reading through the guidelines, it becomes apparent that a hospital or healthcare facility will need a database that allows contact with all staff based on their schedules, their areas of expertise and the hospital needs. Setting up groups of contacts such as clinical staff vs. facilities staff will speed coordination of aid during an event.

The guidelines specifically say you will need more than one mode of communication in case backup forms of communication are needed. Just sending an email or a text will not be enough and your team should evaluate the best ways to interact with your community.

You will need to know where on-duty staff are, if they are safe, and if they are able to care for patients. It goes without saying that you'll need to keep track of your patients specifically around safety, care, and patient transfers.

The CMS elaborates:

"We would expect the facility to include in its emergency plan a method for contacting off-duty staff during an emergency and procedures to address other contingencies in the event staff are not able to report to duty which may include

but are not limited to staff from other facilities and state or federally-designated health professionals."

Documenting Communication

"Providers and suppliers must document efforts made by the facility to cooperate and collaborate with emergency officials."

If you have an emergency preparedness communications platform that automatically archives messages, that will relieve emergency responders from worrying about manually tracking interactions.

The Deadline is Real

The CMS is quite clear the November 2017 deadline must be met: Specifically:

"We do not agree with … a provision that will allow for facilities to apply for extensions or waivers to the emergency preparedness requirements. We believe that an implementation date that is beyond 1 year after the effective date of this final rule for these requirements is inappropriate and leaves the most vulnerable facilities and patient populations without life-saving emergency preparedness plans."

Stability of Platform

While not a specific requirement, emergency planners should consider the stability of their platform to perform during an event. Severe weather and mass casualty events can knock out civilian-grade networks. During a terrorist attack, local officials may bring down civilian networks to slow terrorist coordination. The Everbridge platform is on par with FEMA, if civilian networks are down, Everbridge systems have federal clearance levels that allow our messages to still get through.

Planners have met emergency guidelines for years with the Joint Commission Accreditation Program. As a planner, you likely already have most of these elements in place. We suggest you review your current situation, find the gaps in the plan, and begin speaking to providers who can fill in those gaps.

Everbridge was born from the lessons learned in emergency communication gaps during the 9/11 tragedy. We can meet all of the needs outlined for the CMS Emergency Preparedness Final Rule and we'd be happy to talk to you about how we can get your

facility ready by that November 2017 deadline. Our goal is to partner with you and your team with smart, usable information.

About Everbridge

Everbridge provides a unified critical communication suite that helps clients be better prepared, make better decisions, and respond quickly and confidently during disruptive events. When an incident happens, whether it's a natural disaster or an IT service outage, we automate communications to ensure that the right messages get to the right people at the right time.

Widely recognized by analysts as the market leader, Everbridge solutions are trusted by clients in all major industries and government sectors to connect with over 50 million people around the world.

THE ONLY END-TO-END PLATFORM

- **Planning**: Everbridge is easy to set up, maintain, and organize, meaning that you're always ready for a quick, coordinated response. Everbridge ensures that the right messages get to the right people - with the most advanced opt-in portal on the market, streamlined integration with internal and external data sources, and simple group and contact management.

- **Assessment**: When trouble strikes, you need rich insight, presented simply - so you can quickly assess potential impact and make an informed decision to avoid loss. Everbridge offers the only solution on the market that meets these demanding requirements, with the most advanced interactive dashboard in the industry.

- **Response**: In critical situations, ease-of-use can mean the difference between an effective response and a mistake that carries serious consequences. Everbridge is engineered to be simple to use under pressure, with a user interface that accelerates time-to-message and reduces the likelihood of errors.

- **Delivery**: Even during large-scale disruptions, Everbridge stays on. The most advanced platform in the industry ensures that you reach your contacts - every time. And with worldwide coverage and capabilities, including globally local calling infrastructure and data storage, we're ready to support you wherever your people are in the world.

Visit **www.everbridge.com** to learn more.