#### **Emergency Management Chapter Revisions**

Jim Kendig, MS, CHSP, HEM Field Director, Surveyor Management and Support The Joint Commission

Angela Murray, MSN, RN Project Director, Healthcare Standards Development The Joint Commission



#### Objectives

At the conclusion of this webinar, participants will be able to:

- Understand standards development process
- Describe new EM chapter outline and reference guide
- Describe new and revised EM chapter standards
- Understand revised survey process
- Identify EM chapter resources available



# Standards Development Process

Standards Development Process

Research

- Search Literature & Regulations
- Draft Standards

**Advisory Panels** 

- Surge Planning Subject matter experts
- 50+ Standards Review Panel

**Field Review** 

- Public Field Review
- Analyzed & revised standards

Field notification

- CMS approval of EM chapter
- Published in *Perspectives*



#### New & Revised EM Standards

- 22 New & 38 revised EPs
- 49 out of 60 EPs require written documentation (~82%)
- Establishes comprehensive EM program
- Greater emphasis on the development and use of a hazard-vulnerability analysis
- Increased focus on leadership participation & oversight



Streamlined 124 elements of performance down to 60!



#### **Implementation**

July 1, 2022 for Hospital & Critical Access Hospital Programs



### New EM Chapter Structure

#### New EM CH Structure for HAP/CAH

	GINS EMP
••/	

<b>Emergency Management Program</b>	EM.09.01.01			
<b>Emergency Management Leadership</b>	EM.10.01.01			
Hazard Vulnerability Analysis	EM.11.01.01			
<b>Emergency Operations Plan</b>				
- Planning	EM.12.01.01			
-Six Critical Areas	EM.12.02.01-EM.12.02.11			
<b>Continuity of Operations</b>	EM.13.01.01			
Disaster Recovery	EM.14.01.01			
Staff Education and Training	EM.15.01.01			
Testing the EOP	EM.16.01.01			
<b>Evaluation of the EM Program</b>	EM.17.01.01			





#### New Reference Guide: EM Standards

#### Reference Guide: Emergency Management Standards

Effective July 1, 2022, for Hospitals (HAP) & Critical Access Hospitals (CAH) Only

Lyseline only 1, 2022, yet 120sprints (1212) at critical recess 120sprints (1212) only						
New EM				Apply		Prior EM
Standards EP	EP	Area	Emergency Management Topic	САН	HAP	Standards
EM.09.01.01	1	EM Program	Written EM Program w/all-hazards approach	Х	Х	N/A
EM.09.01.01	2	EM Program	Separately certified Hospitals (unified/integrated EM Program)	x	х	04.01.01/1,2,3
EM.09.01.01	3	EM Program	Complies with laws and regulations	X	X	N/A
EM.09.01.01	4	EM Program	Transplant program (inclusion in the EM Program)	n/a	Х	02.01.01/13
EM.10.01.01	1	EM Leadership	Senior leaders provide oversight & support	x	x	01.01.01/1; 02.01.01/1
EM.10.01.01	2	EM Leadership	Qualified individual to lead the EM Program	X	X	N/A
EM.10.01.01	3	EM Leadership	Multidisciplinary committee oversees EM Program	Х	Х	N/A
EM.10.01.01	4	EM Leadership	Multidisciplinary committee provides input	X	X	N/A



### New & Revised Standards

# EM.09.01.01 Emergency Management Program

#### **Emergency Management Program**

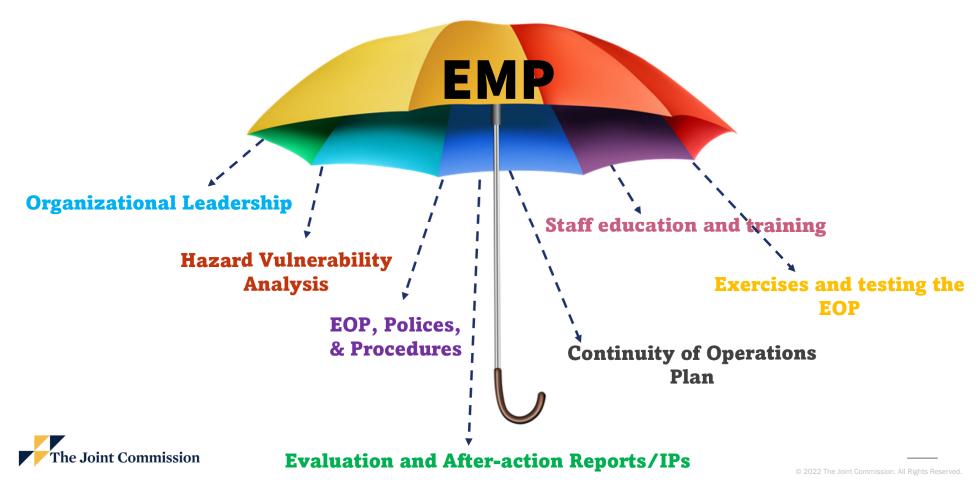


**Standard EM.09.01.01:** The hospital has a comprehensive emergency management program that utilizes an all-hazards approach.

- **EP 1-** Written Comprehensive Emergency Management Program
- **EP 2-** Unified and integrated EM program
- **EP 3-** Compliance with all applicable federal, state, and local EM laws and regulations
- **EP 4-** Addresses organ transplant programs (n/a CAH)



#### **Emergency Management Program**



#### EM.10.01.01

### **Emergency Management Leadership**

#### **EM** Leadership



**Standard EM.10.01.01:** Hospital leadership provides oversight and support of the emergency management program.

- **EP 1-** Responsibilities of senior leaders
- **EP 2-** Selecting a qualified individual to lead the EM program
- EP 3- Multidisciplinary committee with objectives for EM
- EP 4- Activities and actions the multidisciplinary committee is responsible for managing



## EM.11.01.01 Hazard Vulnerability Analysis

#### Hazard Vulnerability Analysis (HVA)

**Standard EM.11.01.01:** The hospital conducts a hazard vulnerability analysis using an all-hazards approach

- **EP 1-** Conduct a facility-based HVA, includes community-based risk assessment
- EP 2- HVA must includes Natural & Human-caused,
   Technological, Hazardous Materials & Emerging Infectious
   Diseases
- EP 3 HVA must be evaluated and prioritized
- **EP 4-** Mitigation and preparedness actions based on the HVA





#### EM.12.01.01

#### **Emergency Operations Plan**

#### **Emergency Operations Plan (EOP)**



**Standard EM.12.01.01:** The hospital develops an emergency operations plan based on an all-hazards approach.

- **EP 1-** Written, All-Hazards EOP − guidance for staff, volunteers, physicians, and other licensed practitioners
- **EP 2-** Identifies patient populations, including at-risk populations and the types of services it will provide during an event
- **EP 3-** Procedures for shelter-in-place vs. evacuation
- **EP 4-** Providing essential needs to staff and patients



#### **Emergency Operations Plan (EOP)**



#### **Standard EM.12.01.01 (cont.)**

- EP 5- Incident Command (IC) structure including operations, roles, responsibilities
- **EP 6** Cooperating and collaborating with other health care facilities, coalitions, EM officials
- **EP** 7- Identify who has authority to activate EOP/ICS
- **EP 8** Identify primary and alternate sites for IC operations
- **EP 9-** 1135 waiver process

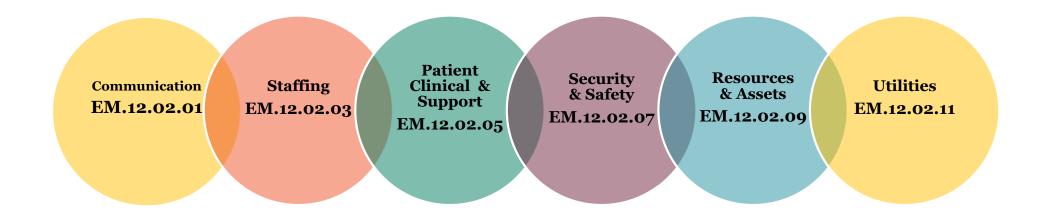


## EM.12.02.01-12.02.11 The Six Critical Areas

#### **Emergency Operations Plan (EOP)**

**Standards EM.12.02.01** – **12.02.11**- The hospital has a plan for...

Includes addressing the six critical areas





#### Communications Plan

- **EP 1-** Maintain a contact list (staff, physician, relevant authorities, other healthcare organizations)
- EP 2- Must establish and maintain communications
- **EP 3-** Reporting organizational needs, occupancy, & ability to provide assistance to relevant authorities
- **EP 4** EM warning and notification alerts
- EP5- Sharing and/or releasing information
- **EP 6-** Primary and alternate communication methods



#### Staffing Plan

- **EP 1** Staffing plan for managing all staff and volunteers
- **EP 2-** Reporting process, roles & responsibilities, & integrating staffing agencies, volunteer staffing, deployed medical assist teams
- **EP 4** Managing volunteer licensed practitioners (verifies identify, primary source verification of licensures, & monitoring)
- **EP 5** Disaster privileging procedures and authority
- EP 6- Supporting staff needs during emergencies or disaster incidents



#### Patient Clinical & Support

- **EP 1-** Sharing patient care & medical documentation, and transfer arrangements with other hospitals
- **EP 2** Managing individuals that present who are not in need of medical care (such as visitors, worried-well persons)
- EP 3- Coordinating with local medical examiner, local mortuary, or other local, regional, state services for surge of unidentified or deceased patients



#### Safety & Security

- **EP 1-** Plan for safety and security measures & coordinating security activities with external agencies
- **EP 2** -Systems to track and/or locate on-duty staff and patients when sheltering-in-place, relocating, or evacuating & document relocation



#### **Resources & Assets**

- **EP 1-** Plan for *how* resources & assets are documented, tracked, monitored, and *how* to locate more resources
- Note: Emergency inventory list & annual review of list not required
- **EP 2-** *How* resources & assets are obtained, allocated, mobilized, replenished and conserved (coordinating within the health care system, vendors/supply chains, health care coalitions)
- EP 3- 96-hour Sustainability Plan (not a checklist of items) –
   Based on resource consumption, calculations & monitoring

#### **Utilities**

- **EP 1** Plan for managing essential or critical utility systems (may include emergency power; heating, ventilating, air conditioning)
- **EP 2-** Maintaining essential or critical utility systems
- **EP 3** Alternative means for providing essential or critical utilities (such as water supply, emergency power, fuel storage tanks, emergency generators)
- EP 4- Alternate sources of energy to maintain temperatures, emergency lighting, fire detection & alarms, sewage & waste disposal



# EM.13.01.01 Continuity of Operations Plan (COOP)

### Continuity of Operations Plan (COOP)



**Standard EM.13.01.01**: The hospital has a continuity of operations plan.

- **EP 1-** Written COOP developed with key executive leaders, business and finance leaders, and other departments
- **EP 2-** How and where will continue to provide essential business functions
- EP 3- Written order of succession plan
- **EP 4-** Delegation of Authority plan (legal authorizations)



### EM.14.01.01 Disaster Recovery Plan

#### Disaster Recovery

**Standard EM.14.01.01**: The hospital has a disaster recovery plan.

 EP 1- Written disaster recovery plan including damage assessments, restoring critical systems and returning to full operations

- **EP 2-** Addresses family reunification and coordinating with local

Recovery

community partners



## EM.15.01.01 EM Education & Training

#### Staff Education & Training



**Standard EM.15.01.01:** The hospital has an emergency management education and training program

- **EP 1-** Written education and training program
- **EP 2-** Initial EM education and training to all staff
- **EP 3** Ongoing education that defines frequency/time frames
- EP 4- Specific education and training for incident command roles



# EM.16.01.01 EM Exercises & Testing

#### **Exercises and Testing**

**Standard EM.16.01.01:** The hospital plans and conducts exercises to test its emergency operations plan and response procedures

- **EP 1-** Written plan for conducting annual testing/exercises
- **EP 2-** Hospital conducts two (2) exercises per year One operations-based exercise
  - Full-scale community-based exercise
  - Functional, facility-based

Other annual exercise operations or discussion based-exercise (seminar, workshop, tabletop)

EP 3- Outpatient care buildings conduct one (1) exercise per year

The Joint Commission

# EM.17.01.01 EM Program Evaluation

### **Program Evaluation**



**Standard EM.17.01.01:** The hospital evaluates its emergency management program, emergency operations plan, and continuity of operations plans.

- **EP 1-** Committee reviews and evaluates all exercises/emergencies after-action report /improvement plans (AAR/IPs)
- EP 2- Senior leadership review all AAR/IPs
- **EP 3-** Reviews & updates **every two (2) years** (HVA, EM program, EOP, P&Ps, communications plan, COOP, education and training, exercises)



# Survey Process

### Focus discussion areas ...

- COOP plan plans
  - Not a separate plan per se ...
- Emerging Infection Diseases
  - Added in 2019 preface statement (see QSO19-06-ALL)
- Why focus on evacuations?
  - Impromptu evacuations wildfires
  - Impromptu evacuations generator failure in FL Sept
     2017; San Diego 2011; CT 2011; NYC Oct 2012 and more!
- 1135 Waivers...



### Reminder: QSO Memo from CMS 5/26/22

#### **Memorandum Summary**

Emergency Preparedness Training and Testing Program Exemption - CMS regulations for Emergency Preparedness (EP) require facilities to conduct exercises to test the facility's EP plan to ensure that it works and that staff are trained appropriately about their roles and the facility's processes. During or after an actual emergency, the regulations allow for a one-year exemption from the requirement that the facility perform testing exercises.

This worksheet presents guidance for surveyors, as well as providers and suppliers, with assessing a facility's compliance with the EP requirements, in light of many of the response activities associated with the COVID-19 Public Health Emergency (PHE).

As the PHE continues, many facilities continue to operate under their respective activated emergency plans. Therefore, CMS is providing additional guidance related to the exercise requirements (full-scale/functional drills and exercises) for inpatient and outpatient providers/suppliers.

This exemption only applies to the next required full-scale exercise (not the exercise of choice), based on the facility's 12-month exercise cycle. The cycle is determined by the facility (e.g. calendar, fiscal or another 12-month timeframe).



DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850



#### Center for Clinical Standards and Quality/Quality, Safety & Oversight Group

DATE: September 28, 2020

Ref: QSO-20-41-AL REVISED 06.21.202 REVISED 05.26.2022

TO: State Survey Agency Directors

Director

FROM:

Quality, Safety & Oversight Group

SUBJECT: Guidance related to Emergency Preparedness- Exercise Exemption based on A Facility's Activation of their Emergency Plan

\*\*\* Revised to provide additional guidance and clarifications due to the ongoing COVID-19 public health emergency (PHE) \*\*\*

#### Memorandum Summary

- Emergency Preparedness Training and Testing Program Exemption CMS
  regulations for Emergency Preparedness (EP) require facilities to conduct exercises to
  test the facility's EP plan to ensure that it works and that staff are trained
  appropriately about their roles and the facility's processes. During or after an actual
  emergency, the regulations allow for a one-year exemption from the requirement that
  the facility perform testing exercises.
- This worksheet presents guidance for surveyors, as well as providers and suppliers, with assessing a facility's compliance with the EP requirements, in light of many of the response activities associated with the COVID-19 Public Health Emergency (PHE).
- As the PHE continues, many facilities continue to operate under their respective
  activated emergency plans. Therefore, CMS is providing additional guidance related
  to the exercise requirements (full-scale/functional drills and exercises) for inpatient
  and outpatient providers/suppliers.
- This exemption only applies to the next required full-scale exercise (not the exercise
  of choice), based on the facility's 12-month exercise cycle. The cycle is determined by
  the facility (e.g. calendar, fiscal or another 12-month timeframe).

#### Background

On September 30, 2019, the Centers for Medicare & Medicaid Services (CMS) published the Medicare and Medicaid Programs; Regulatory Provisions To Promote Program Efficiency, Transparency, and Burden Reduction, Fire Seight Requirements for Certain Dialysis Facilities; Hospital and Critical Access Hospital (CAH) Changes To Promote Innovation, Flexibility, and Improvement in Patient Care Final Rule (84 FR 51732) which revised the requirements for emergency preparedness. Revisions in the Final Rule include:

### Voice Of Customer Survey Process

### Voice of Customer & Survey Process

#### **Conducted 4 Voice of Customer Sessions**

- ✓ SMEs from DSSM project team
- ✓ Critical Access Hospital representation
- ✓ International Assoc. for Healthcare Security & Safety (IAHSS)
- ✓ American Society for Health Care Engineering (ASHE)
- VOC feedback "surveyors were very inconsistent!" & "prefer clinician and LSCS to co-facilitate EM session"
- Implemented interim process June 2021 to July 2022
- Formally adopted new process July 2022



### Updated Survey Activity Guide-July 2022

**#1 Priority-**Provide consistent and systematic review for all HAP/CAH surveyors

#### Provide Consistent review:

- o HAP/CAH's EM Program
- o HAP/CAH's EOP, policies & procedures



### Revised EM Session

Change #1− Added a LSCS and Clinical surveyor to coconduct the EM session together when LSCS ≥ 3 days.

Also, LSCS will conduct EM session for all HAP Psych, CAHs, and ASCs.

### **Participants**

One surveyor

NOTE: A Life Safety Code surveyor will conduct this session on surveys with a hospital clinical surveyor team complement\* of 6 or fewer surveyor days, and of all psychiatric hospitals.

\*This is core hospital team only and does not include any AMB add-on or tailored program surveyor days.



### **Revised EM Session**

Change #2- Consistency when conducting the EM session

- Four distinct discussion topics
  - Part 1: "Actual" emergencies or disaster incidents
  - Part 2: Emergency exercises
  - Part 3: Training and education
  - Part 4: Evaluation, After-action and improvement
  - plans, and review & approval process
- Hospitals should be prepared to discuss recent events, exercises, education & training, program improvements



### Customer Feedback EM Standards & Survey Process

### Feedback on new/revised EM Standards

- "These are the most clearly written standards and elements of performance I have seen in my 24 years of reading and interpreting standards."
- "Much better organization for the chapter."
- "Well written and should be very clear to the organizations what their responsibilities are in this chapter"



# Feedback when LSCS and Clinician conduct EM session...

All I can say is thank you!!! The surveyors were great, and they did a great job! I really liked the new approach as it wasn't focused on documents but on the overall program and it was actually a great discussion where I felt like we were really able to collaboratively speak about not only the standard but what we have done, are doing, and will be doing. I really appreciate this new process not being a check in the box (HVA done and shared – check.....next...). How is your overall program, how involved is leadership and senior leadership and do they support it, collaboration with others, talking about nation wide issues in EM, etc. I also appreciated having two surveyors in the session as it added a new different and challenging dynamic (two people, two thought processes, two different focus areas and conversations). All I can say is great job and thank you so much for taking EM seriously and helping others hospitals understanding the programs importance! Thank you for listening, making changes, and including me through the process!

The Joint Commission

### Workplace Violence Standards & Survey Process

### Workplace Violence & OQPS

### New & revised WPV standards effective-Jan 1, 2022

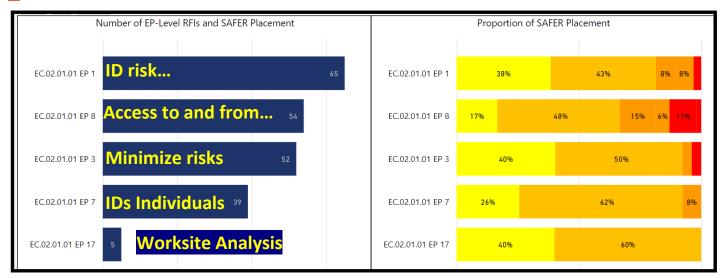
### Office of Quality & Patient Safety (OQPS)

Purpose: triage and review complaints received from a variety of sources

• Since release of WPV standards – 407 total surveys & **51** (13%) included an allegation associated with Workplace Violence - 1/1/2022-7/25/2022



### Workplace Violence & OQPS



**Top 5** most cited WPV standards (1/1/22 - 6/8/22):

• EC.02.01.01, EPs 1, 8, 3, 7, & 17 (above)

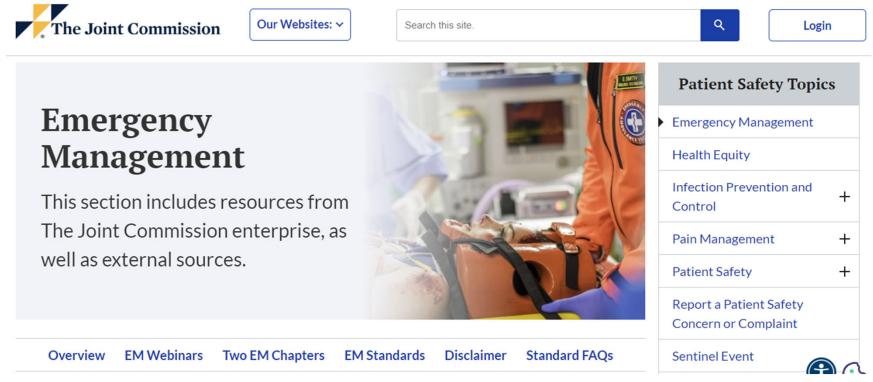
### **Others:**

The Joint Commission

LD.04.01.05, EP 4 & HR.01.05.03, EP 29 (lack of training)

## Resources

### **Emergency Management Website**



https://www.jointcommission.org/resources/patient-safety-topics/emergency-management/



### **EM Reference Guide**

### Two EM Chapters

As of July 1, 2022, there will be two distinct emergency management chapters. For hospitals (HAP) and critical access hospitals (CAH) those programs will follow the new EM chapter standards/EPS and new EM chapter outline that begin with EM.09.01.01- EM.17.01.01. For non-hospital programs (all other program manuals) will continue to follow the current EM standards EM.01.01.01-EM.04.01.01.

A reference guide for hospitals has been developed to assist in cross-referencing the new and revised EM chapter standards to the current standards.

Download the reference guide





### **On-Demand Webinars**



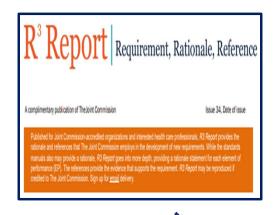
#### Details of the on-demand webinars include:

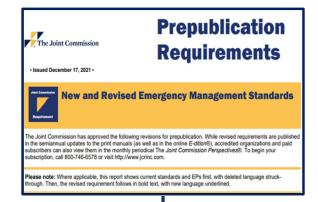
- 1. One Full EM-Chapter overview (20 min)
- 2. Each section of the EM chapter (5-10 min)
- 3. Provides the EM standard/EPs
- 4. Provides implementation strategies
- 5. Select topics of interest

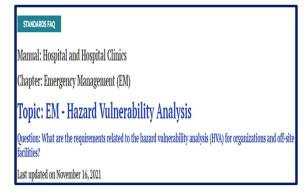
https://www.jointcommission.org/resources/patient-safetytopics/emergency-management/



### **Supporting Resources**







https://www.jointcommission.org/resources/patient -safety-topics/emergency-management/



### Thank you

For more information, please contact the Department of Standards and Survey Methods (DSSM) using the form located at <u>dssminquiries.jointcommission.org</u>





# Questions



### Contact

Jim Kendig, MS, CHSP, HEM
Field Director, Surveyor Management and Support
The Joint Commission
<a href="mailto:Jkendig@jointcommission.org">Jkendig@jointcommission.org</a>

Angela Murray, MSN, RN
Project Director, Healthcare Standards Development
The Joint Commission
<a href="mailto:Amurray@jointcommission.org">Amurray@jointcommission.org</a>



### Joint Commission Disclaimer

The Joint Commission

- These slides are current as of September 13, 2022. The Joint Commission reserves the right to change the content of the information, as appropriate.
- These slides are only meant to be cue points, which were expounded upon verbally by the original presenter and are not meant to be comprehensive statements of standards interpretation or represent all the content of the presentation. Thus, care should be exercised in interpreting Joint Commission requirements based solely on the content of these slides.
- These slides are copyrighted and may not be further used, shared or distributed without permission of the original presenters.
   Distribution of this presentation other than in PDF format is expressly prohibited.