The Joint Commission's: Emergency Management Update 2024

Angela Murray, MSN, RN – Senior Product Director – Global Healthcare Standards

September 10, 2024



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Presenter



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Angela Murray is a Senior Product Director for Healthcare Standards Development. Her background includes over 25 years as an ER/Trauma nurse at Level I and II Trauma Centers in the Chicagoland area. She has also served as adjunct faculty in the College of Nursing at the University of St. Francis in Joliet, IL and now leads The Joint Commission's Emergency Management Chapter standards for all accreditation programs as well as manages the cardiac certifications programs offered by The Joint Commission.

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Disclosure of Relevant Financial Relationships

Angela Murray, MSN, RN reports no relevant financial relationships or relationships she has with ineligible companies of any amount during the past 24 months.



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Learning Objectives

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

- Identify ways to prepare for The Joint Commission's emergency management (EM) survey session
- Understand how the EM survey session will be conducted
- Identify top emergency management scoring and opportunities for improvement



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Polling Question-Show of Hands

How long have you been in your current role as the EM program lead?

- a. 0-3 years
- **b.** 4-9 years
- c. 10-15 years
- d. 16-24 years
- e. 25+ years





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EM Document Review



Hospital Accreditation Survey Activity Guide

July 2024



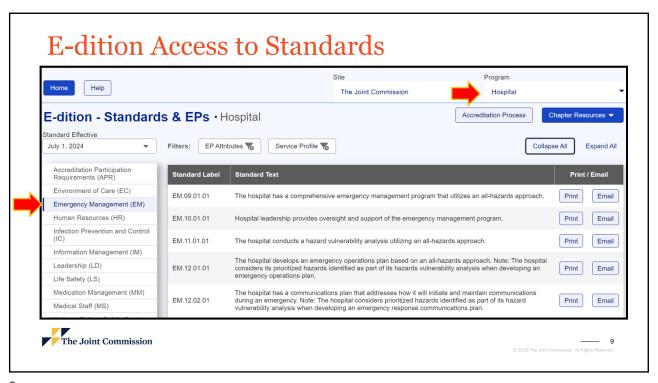
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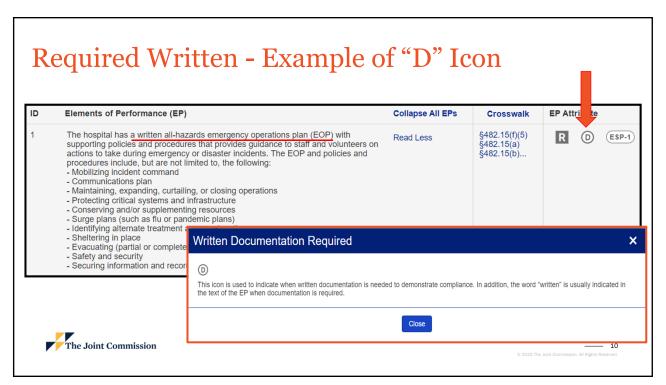
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NEW EM Document Review Tool

EM.15.01.01, EP5 HAP482.15 1.2.3 (d) to (d)(1)(v) EM.16.01.01, EP1 EM.17.01.01, EP3 CAH 485.625 (d) to (d)(1)(v)

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The EM Session

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Goals/Objectives of EM Session

To provide consistent and systematic review of the hospital's emergency management program Application and use of the EOP, policies, and procedures during an emergency (real or simulated) Assess compliance with relevant emergency management chapter standards and applicable law and regulation



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Part 1: Actual Events

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Part 1: "Actual" Events



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Be able to Describe what "actual" events occurred in the past 12/24/36 months



Be able to discuss the HVA, use of EOP, policies and procedures; the six critical areas

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Part 1: HVA Discussion EM.11.01.01



- ✓ Were the recent events identified on the HVA? (EP 1)[®]
- ✓ HVA comprehensively address all risk types? (EP 2)[®]
- ✓ Were risks prioritized & how/what method was used (EP 3)[®]
- ✓ What mitigation/preparedness actions were in place (EP 4)



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Part 1: Six Critical Areas

Part 1: Communications Plan EM.12.02.01



- ✓ How are contact lists maintained. What methods were used to notify staff, authorities, and others (EP 1)[®]
- ✓ How did you establish & maintain communications (EP 2)[®]
- ✓ Were local authorities notified in? (EP 3)[®]
- ✓ What, if any alternative communication methods were used? (EP 6)[®]



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Part 1: Staffing Plan EM.12.02.03



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- ✓ Did your staffing plan sufficiently meet patient care needs? (EP 1)[®]
- ✓ Were there any issues related to reporting processes/staff roles & responsibilities (EP 2)[®]
- ✓ Were there any issues related to verifying volunteer licensed practitioners (EP 4)[®] Who is the designee (EP 5)[®]
- ✓ Were there any staff needs that needed to be met? (EP 6)[®]

Part 1: Patient Clinical & Support EM.12.02.05



- ✓ Were there any impacts on the delivery of care? Any issues for transfer of services? (EP 1)[®]
- ✓ For major/community-wide disasters, were there any nonill/injured persons (EP 2)[®]
- ✓ Did the event require coordination of mortuary services (EP 3)



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Part 1: Safety & Security Plan EM.12.02.07



- ✓ How/what safety and security measures were implemented during the recent events (EP 1)[®]
- ✓ Were any staff/patients relocated? Who is responsible and how would this be tracked? (EP 2)[®]



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Part 1: Resources & Assets EM.12.02.09



- How were resources and supplies managed and how do you track? (such as fuel on hand) (EP 1)[®]
- ✓ If needed, how were additional supplies obtained & from where? (EP 2)[®]
- ✓ How did you assess resources & actions take to sustain operations up to 96-hours? (EP 3)⊚



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Part 1: Utilities Plan EM.12.02.11



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- ✓ Which (if any) essential or critical utility systems were impacted (EP 1) and how were they managed?
 (EP 2)[®]
- ✓ What alternative means were provided (water, power) (EP 3)[®]
- ✓ What are the procedures for maintaining alternative sources of energy? (EP 4)[®]



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Part 2: EM Exercises

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Be able to describe recently conducted EM exercises/drills

-

Be able to discuss/describe how/why the exercises were selected

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Part 2: Emergency Exercises EM.16.01.01



- ✓ What is the written plan for conducting exercises (last year, this year, next year) (EP 1)[®]
- ✓ Did your organization conduct at least two annual exercises? (EP 2)[®]
- ✓ If applicable, how were exercises conducted at outpatient or offsite locations? (EP 3)[®]



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Part 3: Education & Training

Part 3: Education & Training



Be able to describe education & training provided to staff



Be able to discuss/describe how/why the education & training were selected

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Part 3: EM Education and Training



- ✓ What is your education and training plan for EM? (EP 1)[®]
- ✓ What types of initial EMrelated education and training do staff receive (including off-site locations)? (EP 2)[®]



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Part 3: EM Education and Training (cont.)



- ✓ What is your ongoing education plan for EM? And how do you validate staff knowledge of EM policies & procedures? (EP 3)[®]
- ✓ What types of education and training do senior leaders and incident command staff receive (EP 4)[®]



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Part 4: Program Evaluation

Part 4: Program Evaluation



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Be able to describe processes for evaluating exercises or events



Be able to describe recent after-action & improvement plans

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Part 4: After-Action & Improvement Plans



- ✓ What were the wins, opportunities, lessons learned identified by the EM committee? (EP 1)[®]
- ✓ What recommendations have been forwarded to senior leaders for improvement status? (EP 2)[®]



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Part 4: Updated Plans, Policies, & Procedures



- ✓ Based on lessons learned what documents were reviewed, revised, and/or updated? (EP 3)[®]
- ✓ HVA, EOP, policies and procedures, communications plan, etc. must be updated & reviewed at least every 2 years.



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EM Scoring Data

What is the SAFER® Matrix?

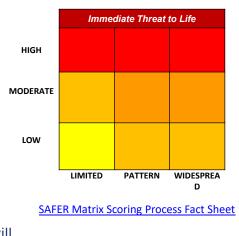
- S: Survey
- A: Analysis
- F: for
- E: Evaluating
- R: Risk

A scoring approach is used for surveys of health care organizations.

Our approach for identifying and communicating risk levels associated with deficiencies cited during surveys.

If an EP is determined to be out of compliance, then it will be cited as an RFI (Requirement for improvement)

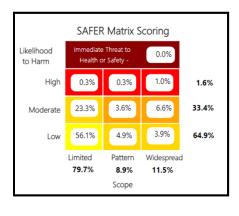
60 days to provide evidence of survey compliance (ESC)



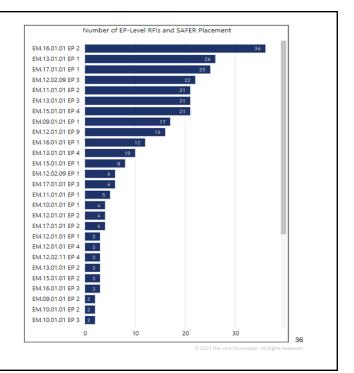
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Most Frequently Cited



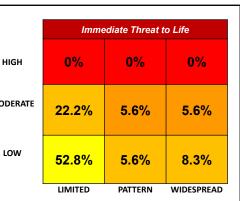
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EM.16.01.01-#1 Most Cited

Standard EM.16.01.01: Organization plans and conducts exercises

EP 2: Organization conducts two exercises per year to test the EOP (one operations-based & one of choice either operations-based or discussion-based)



"Organization did not conduct the two required exercises"

Action: Planning and conducting requires buy-in from various levels of leadership. Be clear on the objectives and the impact to operations if X was not tested.



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Examples of Corrective Action Plans



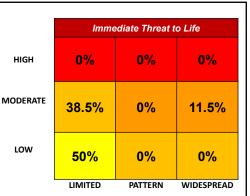
- 1. Implemented a yearly calendar to track exercises/drills
- 2. Add exercises/drill dates standing items for EOC meetings
- 3. Educate and discuss with teams the importance of annual drills
- Developed a tracking dashboard which is reviewed monthly of completed drills/exercises
- 5. Staff turnover impacted annual drills/develop interim processes (EM position vacant for 1 year)



EM.13.01.01- #2 Most Cited

Standard EM.13.01.01: Organization has a continuity of operations plan

EP 1: Written COOP that identifies and prioritizes services and functions that are considered essential or critical



"Organization did not have a written continuity of operations plan"

Action: Identify and include key leaders in discussing or planning. Consider utilizing pre-defined templates/tools when developing the COOP



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Examples of Corrective Action Plans



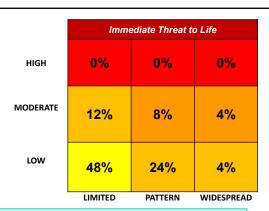
- Update policy software program to send alerts to leaders to trigger annual review of COOP
- Schedule annual review of COOP/EM plans, policies, and procedures and make changes/corrections as need with COOP plan to be reviewed and approved by committee
- Convened CEO, facilities manager, regional facilities director, quality to develop a COOP with specific operations included in the plan
- 4. An EOC sub-committee will annually review/revise the COOP and include key leaders as described in EP 1



EM.17.01.01-#3 Most Cited

Standard EM.17.01.01: Organization evaluates its EM program, EOP, COOP

EP 1: Committee reviews and evaluates all exercises and after-action reports & identifies opportunities for improvements



"Organization did not document any after-action or improvement plans; no detailed summary of what took place during the exercise(s); did not document follow-up or plans for implementation."

Action: Consider utilizing pre-templated forms/tools for After-action and improvement plans. ALL exercises and events must be documented. The outcomes of those events tell the story and actions taken to improve.



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Examples of Corrective Action Plans



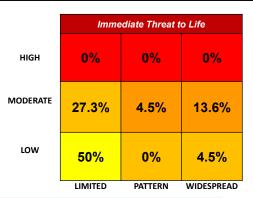
- 1. A root-cause-analysis was conducted, and the issue identified. The disaster committee will now conduct a bimonthly review of after-action reports and address suggested corrective actions that resulted from the incident/drill. The committee will establish responsibility and timelines for addressing the action items.
- EOC/Safety committee identified that the responsibility for drafting AARs had not been assigned related to recent staffing changes. Dir of Quality and Risk was assigned duties for AAR/IPs. This duty will be completed within 14 days of exercise and/or actual emergency or disaster incidents.



EM.12.02.09-#4 Most Cited

Standard EM.12.02.09: Organization's plan for resources and assets

EP 3: Plan for 96-hour sustainability



"The 96-hour sustainability plan lacked elements for critical planning (such as generator fuel) and how resources would be calculated or attained."

Action: Based on all-hazards planning, consider critical resources that would be needed during an emergency/disaster incident. Consider resource calculation tools and identify critical resources management. Pre-determine when evacuation would be imminent.



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Examples of Corrective Action Plans



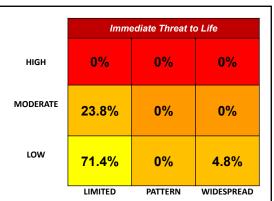
- 1. The disaster feeding plan and disaster water requirements for 96-hour was in the nutrition department and not the EOP. Same for disaster pharmaceuticals. The policies were added to EOP. Incident command was provided education about 96-hour sustainability.
- 2. Identify elements required for 96-hour sustainability such as dietary fuel, pharmacy. Inventories will be reviewed quarterly and keep inventories current.
- 3. A sub-committee was formed to assess 96-hour sustainability chart- committee to use the average. Daily census to estimate usage of critical resources is to be used by ICS during emergencies.



EM.11.01.01-#5 Most Cited

Standard EM.11.01.01: Organization conducts hazard vulnerability analysis

EP 2: Conducts HVA that includes natural, human-caused, technological, hazmat, infectious diseases



"The organization's HVA did not include analysis of emerging infectious diseases (EIDs)."

Action: Coordinate with your infection control practitioner and identify who in the organization maintains surveillance. Do not identify specific IDs, keep in broadbased; such as respiratory or high-consequence infections



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Examples of Corrective Action Plans



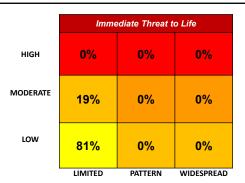
- The EOC/Safety committee was unaware that the HVA needed to include Emerging Infectious Diseases. The HVA is completed annually and if new hazards are identified, this is reported to the committee.
- Obtained a new hazards toolkit to help determine probability of event based on their regional location. The spreadsheet now includes possible events, probability, and risks for natural, technological, human-caused, hazardous, and infectious diseases. Leadership was trained on the new toolkit.



EM.13.01.01- #6 Most Cited

Standard EM.13.01.01: Organization has a continuity of operations plan

EP 3: Written order of succession plan



"Organization did not have a written plan for leader's orders of succession"

Action: Identify critical roles, determine skills/access, pre-position access/authority, develop successors, teach/train. Levels of succession vary by hospital needs.



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Examples of Corrective Action Plans



- 1. A succession plan was created and added to the EM plan. Identified key leaders for replacement during an emergency.
- 2. A visual chart was developed for the succession plan to be used by IC during emergencies/disasters. The Plan identifies who is authorized to assume a particular leader or manager role when the person is unable to fulfill their function or perform duties.
- 3. Identified succession planning for the incident commander CEO> CNO>CFO>Dir of Risk.

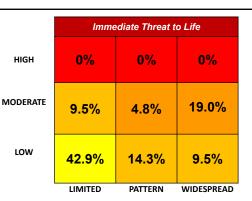
(suggest succession planning for other key units/departments to be included)



EM.15.01.01-#7 Most Cited

Standard EM.15.01.01: Organization has an EM education and training program

EP 4: Organization provides education specifically for incident command staff



"The organization did not provide education & training or define who in leadership should take ICS 100/200/700/800 or process for ICS"

Action: TJC does *not* mandate specific education for leaders. However, based on their incident command role consider what training should be provided/acquired to be successful during a disaster.



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Examples of Corrective Action Plans



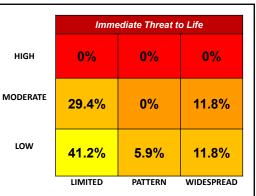
- Leadership team met to discuss lack of participation in completing NIMS courses. Many leaders had been promoted or acquired externally. The education department will ensure competencies for new hires are completed within 90 days.
- A list of Incident Commanders is kept on file in the EM office including certificates of completion from NIMS.
- 3. Due to turnover, those that hold key positions were not included on IC education. Identified Director of Safety to be the owner of the program and ensure timely training. Training files will be kept in HR.



EM.09.01.01-#8 Most Cited

Standard EM.09.01.01: Organization has a comprehensive EM Program

EP 1: Develops a comprehensive EM Program including all the listed items



"The hospital was missing several elements from its program- therefore was not comprehensive in nature."

Action: See listed items at EM.09.01.01, EP 1 – make certain that your EM program includes all concepts when developing/revising policies & procedures.



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Examples of Corrective Action Plans



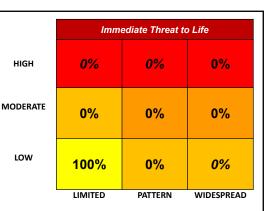
- A multidisciplinary team was assembled to revise and update the EM Plan- objectives were developed. Establish a comprehensive approach to providing consistent, effective, efficient coordination across a spectrum of disaster response activities. The comprehensive plan now addresses all elements listed under EP 1.
- 2. Updated the EM Binder to include new TJC standards (hint: new in July 2022).



EM.12.01.01-#9 Most Cited

Standard EM.12.01.01: Organization develops an emergency operations plan

EP 9: Develops policies and procedures for 1135 waivers for care and treatment at alternate care sites



"The organization did not have procedures for 1135 waivers or a process for how to apply"

Action: Identify a process. Understand the role of 1135 waivers and review CMS' quidance on 1135 waivers.



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Examples of Corrective Action Plans



- The EM policy and procedure for requesting 1135 waivers was approved for use and identified alternate care sites
- 2. Annual review and approval process was added to committee agendas.

CMS: Policies and procedures in place that address the following:

- Knowledge of how to request a Section 1135 waiver;
- The circumstances when a Section 1135 waiver might be granted based on the risk analysis (i.e. temporarily expanding licensed bed capacity due to prolonged surge);
- The role of the hospital in providing care at an alternate care site and how to operate under an 1135 waiver (i.e. communicating relocation to an alternate
- Download or have immediate access to the CMS Section 1135 website.

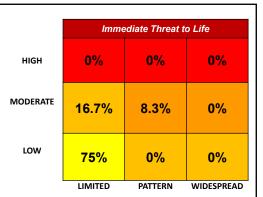


https://www.iroquois.org/wp-content/uploads/2019/11/CMS-1135-Waiver-and-ACS-Requirements.pdf

EM.16.01.01-#10 Most Cited

Standard EM.16.01.01: Organization plans and conducts exercises

EP 1: Written plan for when and how it will conduct its annual exercises



"Organization did not include the 6-critical areas when planning and conducting exercises."

Action: Consider the impact of testing/not-testing the 6 critical areas. All 6 critical areas should be accounted for even if "n/a" to the drill scenario on the after-action.



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Examples of Corrective Action Plans



- 1. The organization's After-action report was updated to include the six critical areas. Key areas will be addressed after every drill and/or actual emergency to better understand strengths, weakness, gaps in the EOP and COOP.
- 2. Written exercise program has been added that is based on the HVA. Review will occur every 2 years.

CMS: Hospitals are required to maintain an emergency preparedness <u>training and testing program</u> that is based on the organization's risk assessment (HVA) and has incorporated policies and procedures, communications plan when training and conducting exercises.



Summary of The Joint Commission's Update

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Tools and Resources

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- Yes
- □ No

2. Do I have access to the most current Hospital Accreditation Survey Guide (July 2024)

- Yes
- □ No

3. Who in my organization disseminates information from The Joint Commission's *Perspectives* articles when there are revisions to EM?

■ Name of accreditation specialist/primary contact:



Tools and Resources-cont.

4. Have I downloaded a copy of the EM Document Review Tool?

☐ Yes☐ No

5. How will I use the EM Document Review Tool to make sure my organization is prepared for its next Joint Commission survey?

6. Do I have a process for reviewing and revising EM plans, policies, and procedures at least every 2 years?

Yes

No
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Tools and Resources-cont.

7. Do I have a process for providing & tracking EM education and training to staff at least every 2 years on listed items at EM.15.01.01, EPs 1-3?

☐ Yes

■ No

8. Do I have a process for developing & tracking at least 2 annual EM exercises or drills that include staff as listed at EM.16.01.01, EPs 1-3?

Yes

□ No

9. What has changed internally/externally that would impact operations at my facility? Is the HVA current and/or relevant to my organization? Has it been reviewed and updated at least every 2 years?

Yes

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Tools and Resources-cont.

- 10. Has my organization undergone significant changes in leadership? Do they know their roles & responsibilities during an emergency or disaster incident? Has IC staff been trained?
 - Yes
 - No
- 11. Do I have a representation for a multidisciplinary committee do we meet often enough to meet the objectives/goals for the EM program to be successful?
 - Yes
 - No
- 12. Do I have the support of my leadership team to do my job well?
 - Yes
- No
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Thank you

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