

Part 3 - Meeting the CMS Minimum Requirements for Emergency Preparedness:

Policies & Procedures

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Before we begin...

Housekeeping

- ▶ Please silence your cell phones
- ▶ Review of evacuation procedures



Today's objectives:

- ▶ Understand the minimum requirements of the new CMS rule for Emergency Preparedness for Community Health Centers
- ▶ Become knowledgeable about emergency management related policies and procedures
- ▶ Learn about different free online tools for developing and updating policies and procedures

References:

- ▶ PHI: Protected Health Information
- ▶ HHS: Health & Human Services
- ▶ HIPAA: Health Insurance Portability and Accountability Act
- ▶ HITECH: Health Information Technology for Economic and Clinical Health Act
- ▶ EHR/EMR/EHS: Electronic Health Record/Electronic Medical Record/Electronic Health System
- ▶ HIO: Health Information Organizations
- ▶ HIT: Health Information Technology

CMS rule for minimum EP requirements

- ▶ **REGULATORY REQUIREMENT** as a Conditions of Participation (CoP)
- ▶ Includes 17 provider and supplier types
- ▶ Must be “in compliance” to participate in Medicare and Medicaid
- ▶ Four focus areas:
 1. Emergency plan
 2. Policies and procedures
 3. Communications plan
 4. Training and testing program (including **2 annual exercises**)
- ▶ **All-hazards Risk Assessment** tied to each focus area

Part 3: Policies & Procedures

- ▶ What is a policy?
- ▶ What is a procedure?

- ▶ Can you name a policy and a procedure you follow each day?

P&P Example: HIPAA

- **Privacy Rule:** Organizations must identify the uses and disclosures of protected health information (PHI) and put into effect appropriate safeguards to protect against an unauthorized use or disclosure of that PHI. When material breaches or violations of privacy are identified, the organizations must take reasonable steps to solve those problems in order to limit exposure of PHI.
- **Security Rule:** Defines the administrative, physical and technical safeguards to protect the confidentiality, integrity and availability of electronic protected health information.

(45 CFR Part 160 and Subparts A and C of Part 164)

EHR

What is the difference: policy vs. procedure?

GUIDELINE -----
[provides additional, recommended guidance]

PROCEDURE -----
[establishes proper steps to take]

STANDARD -----
[assigns quantifiable measures]

POLICY -----
[identifies issue & scope]



POLICY

The formal guidance needed to coordinate and execute activity throughout the district. When effectively deployed, policy statements help focus attention and resources on high priority issues - aligning and merging efforts to achieve the district's vision. Policy provides the operational framework within which the district functions.

- Widespread application
- Changes less frequently
- Usually expressed in broad terms
- States "what" and/or "why"
- Answers operational issues

PROCEDURE

The operational processes required to implement district policy. Operating practices can be formal or informal, specific to a department or building or applicable across the entire district. If policy is "what" the district does operationally, then its procedures are "how" it intends to carry out those operating policy expressions.

- Narrow application
- Prone to change
- Often stated in detail
- States "how", "when", and/or "who"
- Describes process

Why we have Policies & Procedures

- ▶ Evidence-based standards of practice
- ▶ Rulebook
- ▶ Shared understanding
- ▶ Contribute to ability of teammates to work together
- ▶ Ensure best quality of care for patient

Policies & Procedures specific to CMS rule:

- ▶ Establish Policies & Procedures
 - ▶ How will your health center execute your emergency plan?
 - ▶ What risks have been identified?
 - ▶ How do the policies and procedures address the risks that have been identified?
- ▶ Annual updates
- ▶ Safe evacuation plan*
- ▶ Safe **shelter-in-place**** for: patients, staff, & volunteers
- ▶ Secure, confidential & immediately available medical documentation system and secondary back up system plan
- ▶ Volunteer & emergency staffing processes to address surge needs

Key references:

- ▶ CMS Rule for Minimum Emergency Preparedness Requirements - <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertEmergPrep/Emergency-Prep-Rule.html>
- ▶ Assistant Secretary for Preparedness and Response (ASPR) Technical Resources Assistance Center Information Exchange (TRACIE) webpage on the rule - <https://asprtracie.hhs.gov/cmsrule>

Sample P&P:

- ▶ <https://hr.vanderbilt.edu/policies/emergency-preparedness.php>

Thank you!

Questions? Contact Tina Wright, twright@massleague.org

