

CMS Emergency Preparedness Final Rule

CMS Preparedness Compliance Made
Faster, Easier & More Effective

IN September of 2016, the Centers for Medicare and Medicaid Services (CMS) issued its final ruling for the *Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers*. The ruling's purpose is to establish national emergency preparedness requirements for healthcare providers, ensuring adequate planning and coordination for all types of disasters.

The ruling is serious business. Medicare and Medicaid facilities should have been in compliance with the ruling as of November 16, 2017 to continue receiving reimbursements. Many healthcare facilities across the country are still striving to meet the ruling's significant emergency planning requirements.

Unfortunately, many of these plans will prove to be inadequate.

Historical approaches, with their reliance on hard-copy, binder-based plans, could place healthcare facility staff, patients and reimbursement revenues at risk. In today's world of online Software-as-a-Service (SaaS) planning solutions, such risks are unnecessary.

Consider the following 10 reasons why online emergency preparedness planning software is a better answer than binder-based plans for meeting CMS Final Rule compliance.

Better Alignment with CMS Requirements

For many in the healthcare industry, the act of developing an all-inclusive emergency preparedness plan is a new and daunting task. Even with basic training, it is easy to overlook necessary plan components and dependencies that are critical to complying with the CMS ruling.

The best online planning solutions offer a step-by-step, templated approach to compliance. Like tax preparation software that guides users to accurately formulating income tax returns, top emergency planning solutions provide guidance for capturing the right information, making it easier and faster to create operative contingency plans.

Examples of CMS-specific plan components include: patient/staff allocation and relocation counts, Hospital Incident Command System (HICS) checklists, Homeland Security Exercise and Evaluation Program (HSEEP)-compliant documentation, and 1135 Waivers and reference libraries guidance.

Easier Editing and Maintenance

Binder-based plans, even if complete prior to the deadline, will rapidly become outdated given the perpetual personnel and organizational changes within a healthcare facility. Updating hard-copy plans may require a reprint of an entire contact section each time an employee joins or leaves the organization.

Online planning solutions make editing records, teams and plans fast and easy. Users simply login, make changes and save. Assignments, duties, team memberships, etc. will be updated automatically throughout the plan.

Better Planning Collaboration

Emergency preparedness planning cannot be conducted successfully in isolation. It requires deep collaboration between multiple people, departments and external agencies. In the past, manual collaboration and data collection efforts (such as emailed documents, post-it notes, whiteboard scribbles, etc.) made the plan development process more complex and time consuming.

Today, online planning solutions are easily accessible at any time. Further, with flexible administrative controls, access and editing permissions can be tailored to ensure only the right people gain entrance and have input.

This makes collaboration among key stakeholders easier, faster and more comprehensive.



CMS RULE ALIGNMENT

Like tax preparation software that guides users to accurately formulating income tax returns, top emergency planning solutions provide guidance for capturing the right information.

Enhanced Security

Along these lines, emergency response plans should be well protected. They typically contain Sensitive Personal Information (SPI) such as private phone numbers and addresses for key personnel. Additionally, details of crisis response procedures in the hands of chaos-intent individuals could be used to fulfill nefarious goals.

Binder shelves have virtually no access limitations and safeguards. Further, there is no audit trail of who has accessed the documents and at what times.

Online planning software provides for permission-based access to plan details and contact information via assigned user names and passwords. Further, logins and other activities are generally time-stamped and recorded for auditing or investigative purposes.

Improved Plan Redundancy/Backup

Events that could negatively impact access to hard-copy emergency response plans themselves should be considered. Fires, broken pipes, severe weather, etc. may destroy the location housing emergency plan binders. Even if plans remain physically intact, they may be completely inaccessible due to building damage, biohazard contamination or other reasons.



ENHANCED SECURITY

Emergency response plans should be protected. They typically contain Sensitive Personal Information (SPI) such as private phone numbers and addresses for key personnel.

And, while it's feasible to make a backup copy of all materials and store them in a separate location, accessing these offsite copies may be time consuming during an event.

Online planning solutions are accessible from any location with a network connection. No installed software is required so information can be accessed via any modern web browser.

More Effective Testing and Exercising

Testing and exercising emergency response plans is one of the key components outlined in the CMS ruling. If binder-based plans have not been meticulously maintained or are difficult to search, major hurdles may arise during mandatory exercises.

While most certainly one of the goals in testing/exercising is to identify shortcomings in the process, planners hope these gaps are minor. Major issues can erode organizational confidence and damage internal reputations if exercises do not have generally positive outcomes.

With easier updating, faster searching and better collaboration capabilities, online software improves the odds of successful testing and exercising (not to mention greater success during a real event).

Greater Access to Supporting Data or Files

It is rare that an emergency preparedness plan is completely self-contained. Frequently, supporting documents, digital files, images, etc. need to accompany the core plan. As such, emergency response coordinators relying on binder-based plans and seeking to locate supporting material may struggle during the high-pressure situation of a plan invocation.

With quality online planning software, supporting files can be archived and available online. Secondary files are also easily searchable and may be linked to appropriate locations within the document itself.

Faster Response

A comprehensive emergency preparedness plan is really a conglomeration of multiple mini-plans. Various hazards and scenarios each have their own activities, response teams, etc. It's the reason why most plans consume not just a single binder, but often fill shelves containing multiple binders. As such, precious time can be wasted manually scouring printed Tables of Contents or Indexes looking for the right piece of information.

With well-designed online planning software, information is easily accessed and key elements can be searched electronically to uncover crucial data within seconds.

Superior Mobility

A binder-laden shelf is difficult, if not impossible, to move in the event of a disaster impacting an organization's facility. Even computer-based applications can be inadequate if key members of the crisis response team are offsite without laptops, riding in vehicles, etc.

In addition to offering browser-based solutions, today's leading planning software providers also offer mobile capabilities. These mobile apps place emergency response plans quite literally in the hands of the right people wherever they may be. They generally display a streamlined set of functions formatted in a manner acceptable for mobile device usage. In all, these mobile capabilities extend the practical application of crisis planning.

Helpful Third-party Guidance and Support

Finally, the benefits of utilizing online software for CMS planning may extend beyond the software itself. Depending on your organization, emergency response plans can be tricky and complex. While a DIY strategy may be great for improving your landscaping, it may fall short when applied to such a critical process as emergency planning.

Leading emergency response planning providers often have highly skilled and certified planners on staff. Access to these professionals may be incorporated into the acquisition of a software solution, removing the many headaches and concerns of tackling this type of project on your own.

The broad goals and tight deadline of the CMS emergency preparedness final rule is creating substantial urgency among healthcare providers throughout the nation. Administrators and other healthcare stakeholders are not simply content to meet the ruling's minimum requirements. They also recognize the true need for improved emergency preparedness in this uncertain world.

While manual, binder-based planning approaches served their role historically, they no longer fulfill today's modern requirements. The right online solution offers an easier, faster, more flexible and more effective approach to emergency preparedness planning.

About BOLDplanning Inc.

BOLDplanning is the leading developer of online software for Emergency Operations Planning (EOP), Continuity of Operations Planning (COOP), Business Continuity Planning (BCP) and Hazard Mitigation.

Its comprehensive online system built specifically around the CMS Ruling walks planners through each step of the continuity and emergency planning process, becoming the central resource for your organization's training, plan development and on-going maintenance. Its support team is unrivaled in its knowledge, experience and planning certifications.

The BOLDplanning approach provides an unparalleled platform for both the public and private sector, making this important process easy and efficient. Currently, BOLDplanning is the solution of choice for more than 7,000 organizations.