



CMS Emergency Preparedness

Final Rule





The core elements of the CMS Emergency Preparedness Rule, include:

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

What You Need to Consider to Meet the Criteria

The CMS Emergency Preparedness Rule, establishes national emergency preparedness requirements to ensure adequate planning for both natural and man-made disasters, and coordination with federal, state, tribal, regional and local emergency preparedness systems. To help you execute a well-devised plan that's CMS ready, we've devised a brief overview of the Rule, which went into effect on November 17, 2017.

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

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

In addition, the plan must account for possible local community threats (i.e. wildfires or blizzards) and 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



Devise communications that account for your local population, ensuring that all individuals within your community can access information in a language they can understand.

Meeting Communications Criteria

When assessing whether your communication platform will meet CMS guidelines the following factors are critical to the success of your emergency preparedness plans and compliance (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.”

Responding immediately when an incident occurs is critical. To ensure your communications network can be easily activated and all appropriate contacts are reached in a timely and appropriate manner, your communications system should have the capability to send messages via multiple options (mobile, robocalls, text, email etc.). This system should include ready-made templates to ensure messages can be quickly tailored to a specific incident.

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.”

Devise communications that account for your local population, ensuring that all individuals within your community can access information in a language they can understand. Create prepared templates that account for different languages and can easily be tailored to a specific incident with a few modifications.

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.”

Hospitals are often at the center of their communities when it comes to ensuring the health of the local population. This is particularly evident during a crisis, when those in need of aid tend to turn to their local Emergency Department. 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 coordinate transfers of patients during an event, ensuring your communications account for the following:

- + The ability to communicate easily with off-hospital coordinators to send and receive information
- + The ability remain HIPAA-compliant as patients are being transferred, whether 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.”

Hospitals or healthcare facilities should have a database that allows contact with all staff based on their schedules, their areas of expertise and the hospital’s needs. This will ensure you can account for all staff, where on-duty staff are located during an incident, and better assess if they are safe and are able to care for patients.

Setting up groups of contacts such as clinical staff vs. facilities staff will speed coordination of aid during an event. The guidelines specifically state that more than one mode of communication is required given that employees may be impacted in different ways and back-up forms of communication may be necessary. To help minimize disruption, your team should evaluate the best ways to interact with your team members. 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.”

Why Everbridge: Scale, Architecture, Redundancy

Everbridge’s critical communications platform is the only platform to deliver:



High Availability and Scalability

15 data centers, flexible capacity, and full stack redundancy



Redundancy Across Major Modalities

Multiple SMS and voice providers vetted to ensure no downstream inter-dependencies, optimized for local delivery



Redundant Network Operation Centers

Two geographically distributed NOC’s staffed 24x7x3



Multiple Live Support Teams

Global live support team with 24x7x365 tier 1 and tier 2 staffing



Flexible, Redundant Access

Web, mobile app, IVR, API & live operator telephone access

Documenting Communication

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

The CMS requirements also call for health care providers to document efforts, logging steps during an event for review purposes and to submit to federal, state and local agencies as needed. If you have an emergency preparedness communications platform that automatically archives messages, that will relieve emergency responders from worrying about manually tracking interactions.

Stability of Platform

While not a specific requirement, emergency planners should consider the stability of their platform during an event. Severe weather and mass casualty events can knock out civilian-grade networks. During a terrorist attack, local officials may temporarily disconnect 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 get through regardless.

CMS Compliance is Real

The CMS is quite clear that compliance must be met:

“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.”

However, with the right communication plans and tools in place, hospitals and health care providers will not only meet compliance but they'll be better prepared should an emergency incident occur in the future.

Visit www.everbridge.com/cms-emergency-preparedness/ to learn more.

About Everbridge

Everbridge, Inc. (NASDAQ: EVBG) is a global software company that provides enterprise software applications that automate and accelerate organizations' operational response to critical events in order to keep people safe and businesses running faster. During public safety threats such as active shooter situations, terrorist attacks or severe weather conditions, as well as critical business events such as IT outages, cyber-attacks or other incidents such as product recalls or supply-chain interruptions, over 3,800 global customers rely on the company's SaaS-based platform to quickly and reliably aggregate and assess threat data, locate people at risk and responders able to assist, automate the execution of pre-defined communications processes, and track progress on executing response plans. The company's platform sent over 2 billion messages in 2017, and offers the ability to reach more than 200 countries and territories with secure delivery to over 100 different communication devices. The company's critical communications and enterprise safety applications include Mass Notification, Incident Management, Safety Connection™, IT Alerting, Visual Command Center®, Crisis Commander®, Community Engagement™ and Secure Messaging. Everbridge serves 9 of the 10 largest U.S. cities, 8 of the 10 largest U.S.-based investment banks, 25 of the 25 busiest North American airports, six of the 10 largest global consulting firms, six of the 10 largest global auto makers, all four of the largest global accounting firms, four of the 10 largest U.S.-based health care providers and four of the 10 largest U.S.-based health insurers. Everbridge is based in Boston and Los Angeles with additional offices in San Francisco, Lansing, Orlando, Beijing, London, and Stockholm. For more information, visit www.everbridge.com, read the company [blog](#), and follow on [Twitter](#) and [Facebook](#).



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