Tool: Home Health
Conditions of
Participation Emergency
Preparedness Policy and
Procedure Checklist





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Standards of this CoP include:

Emergency Plan;

Emergency Preparedness Policies and Procedures;

Communication Plan;

Training and Testing

HHAs that are part of an integrated health system

Regulation

Emergency Preparedness - Sec. 484.102

The CoP for Emergency Preparedness was formerly located at 484.22. This CoP mirrors the Emergency Preparedness regulations for most Medicare certified providers, which were effective on November 16, 2016. This CoP requires HHAs to comply with all applicable federal, state and local emergency preparedness requirements.

Emergency Plan, Sec. 484.102(a): The CoPs require the HHA to have an Emergency Plan ("Plan") that must be reviewed and updated at least annually. The Plan must be based on a facility- and community-based risk assessment utilizing an all-hazards approach. The Plan must include strategies for addressing emergency events as indicated in the risk assessment. It also must address patient populations that include what services the HHA can provide in an emergency and continuity of operations during an emergency. The Plan must include a process for cooperation and collaboration with all emergency preparedness officials in order to maintain an integrated response during an emergency situation.

Policies and Procedures, Sec. 484.102(b): The CoPs require the HHA to develop and implement

Recommended Action

The following are the requirements which need to be in your Policy and Procedures: Emergency Preparedness as per the Conditions of Participation and included in staff training as applicable:

- Emergency Plan ("Plan") must be reviewed and updated at least annually
- The Plan must be based on a facilityand community-based risk assessment utilizing an all-hazards approach.
- The Plan must include strategies for addressing emergency events as indicated in the risk assessment.
- The plan must address patient populations that include what services the HHA can provide in an emergency and continuity of operations during an emergency.
- The Plan must include a process for cooperation and collaboration with all emergency preparedness officials in order to maintain an integrated response during an emergency situation.
- The HHA must have a procedure for informing state and local officials who would need to be evacuated from their homes due to an emergency.



policies and procedures based on the Plan. These policies and procedures must be reviewed and updated at least annually. The policies and procedures must address how the HHA handles patients during a disaster that must be addressed in the comprehensive patient assessment for each patient. The HHA must have a procedure for informing state and local officials who would need to be evacuated from their homes due to an emergency. The HHA must have a procedure for determining how services will be provided when there is an interruption in services due to an emergency. This includes a requirement that the HHA notify state and local officials of any on-duty staff or patients they are unable to contact. The HHA must have a system for protecting patient information and the confidentiality of such information in the event of an emergency. The HHA is required to have a process on the use of volunteers or other staffing to address surge needs during an emergency.

Communication Plan, Sec. 484.102(c): The HHA must develop and maintain an emergency preparedness communication plan that must be reviewed and updated at least annually. The communication plan must have contact information for staff, contracted entities providing services to the HHA, patients' physicians, volunteers, emergency preparedness staff at all levels of government and other sources of assistance. The HHA must have a primary and alternative means of communication for contacting staff and emergency preparedness agencies. The HHA must implement a method for sharing patient information with other health care providers to ensure continuity of care.

Training and Testing, Sec. 484.102(d): HHAs are required to develop and maintain an emergency training and testing program taking into account the Emergency Plan, Risk Assessment, Policies and Procedures and Communication Plan described above. The training and testing program must be updated at least annually. The

- The HHA must have a procedure for determining how services will be provided when there is an interruption in services due to an emergency. This includes a requirement that the HHA notify state and local officials of any onduty staff or patients they are unable to contact.
- The HHA must have a system for protecting patient information and the confidentiality of such information in the event of an emergency.
- The HHA is required to have a process on the use of volunteers or other staffing to address surge needs during an emergency
- The HHA must develop and maintain an emergency preparedness communication plan that must be reviewed and updated at least annually.
- The communication plan must have contact information for staff, contracted entities providing services to the HHA, patients' physicians, volunteers, emergency preparedness staff at all levels of government and other sources of assistance.
- The HHA must have a primary and alternative means of communication for contacting staff and emergency preparedness agencies.
- The HHA must implement a method for sharing patient information with other health care providers to ensure continuity of care.
- Develop and maintain an emergency training and testing program taking into account the Emergency Plan, Risk Assessment, Policies and Procedures and Communication Plan. The training and testing program must be updated at least



training program must provide training on emergency preparedness policies and procedures. This training must be to staff, individuals providing services under arrangement and volunteers at least annually. The HHA must maintain documentation of the training. With regard to testing, the HHA must conduct exercises to test the emergency preparedness plan at least annually. The HHA must participate in a full-scale and community-based exercise on the emergency preparedness plan. If a community-based exercise is not accessible, the testing may be facility-based. A second community or facility-based exercise must also be conducted. This exercise must include a tabletop exercise, which includes a group discussion led by a facilitator.

Integrated Health Care Systems, Sec. 484.102(e): If an HHA is part of an integrated health care system that includes other certified providers, the HHA has the option of choosing to be part of the health care system's emergency preparedness plan. If the HHA participates in the system-wide emergency preparedness plan, it must ensure the HHA's patient population and services offered are taken into account.

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- The HHA must participate in a full-scale and community-based exercise on the emergency preparedness plan.
- A second community or facility-based exercise must also be conducted. This exercise must include a tabletop exercise, which includes a group discussion led by a facilitator.

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If the HHA participates in the system-wide emergency preparedness plan, it must ensure the HHA's patient population and services offered are taken into account.