

ASPR TRACIE Technical Assistance Request

Requestor: [REDACTED]
Requestor Phone: [REDACTED]
Requestor Email:
Request Receipt Date (by ASPR TRACIE): 19 June 2017
Response Date: 23 June 2017
Type of TA Request: Standard

Request:

[REDACTED] requested technical assistance in finding subsistence policy examples for her organization's residential hospice program. She noted her organization is required to identify those supplies and processes to ensure that they can provide for the needs of clients/families in the event of an emergency.

Response:

The ASPR TRACIE Team reviewed existing Topic Collections for resources related to subsistence policies; namely the [ASPR TRACIE Homecare and Hospice Topic Collection](#). We also conducted a search online for additional resources. Resources gathered are listed below in section I. Please also note, ASPR TRACIE responded to a TA request for resources regarding sewage and waste disposal (as one of the items listed under provision of subsistence needs in the CMS EP Rule). Our full response can be found in the [Information Exchange](#) (free registration required).

Below are direct links to the hospice sections within the CMS EP Rule that you may find most helpful:

- Emergency Preparedness Regulations for Hospices (§ 418.113):
<https://www.federalregister.gov/d/2016-21404/p-666>
- Subsistence Requirement for providers and suppliers:
<https://www.federalregister.gov/d/2016-21404/p-1726>

CMS-specific Information:

CMS recently published the [interpretive guidelines](#) and the State Operations Manual that addresses specific regulatory expectations. This is posted on their website (under the Downloads section): <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertEmergPrep/Emergency-Prep-Rule.html>. ASPR TRACIE has developed and collected a number of resources that we encourage you to use and believe will help facilitate compliance, including the resources provided here. However, this does not substitute review of the final rule text and interpretive guidelines. If you have specific questions about your facility's compliance please review the interpretive guidelines when they are developed, contact your state's survey agency, or the CMS Survey and Certification Group (SCG) at the following email address: SCGEmergencyPrep@cms.hhs.gov.

CMS and ASPR TRACIE are partnering to provide technical assistance, and share resources and promising practices to help affected providers and suppliers start or update the documents mandated by the new Emergency Preparedness rule. Additional key resources include:

- The ASPR TRACIE dedicated CMS Rule page: <https://asprtracie.hhs.gov/cmsrule>
- The entire CMS Emergency Preparedness Rule: <https://federalregister.gov/a/2016-21404>
- The CMS Emergency Preparedness Survey and Certification Page: <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertEmergPrep/Emergency-Prep-Rule.html>
- CMS has [developed a Quick Glance Table of the rule requirements by provider type](#), to highlight key points of the new Emergency Preparedness rule. **NOTE:** This table is not meant to be an exhaustive list of requirements nor should it serve as a substitute for the regulatory text.
- ASPR TRACIE developed a [CMS Emergency Preparedness \(EP\) Rule Resources at Your Fingertips Document](#). Within this document are links to key resources:
 - CMS' developed [frequently asked questions \(FAQ\) documents](#) that synthesizes answers to commonly asked inquiries about the CMS EP Rule.
 - The FAQs, in combination with the CMS [at-a-glance chart](#) and [Provider and Supplier Type Definitions Fact Sheet](#), can help planners identify and address planning gaps and facilitate compliance with the regulations.
 - Interested in learning more about your local healthcare coalition? [This chart](#) can help you identify the preparedness office of your state public health agency. Remember: the release of the CMS EP Rule provides healthcare coalitions a tremendous opportunity to strengthen relationships and leverage a broader group of personnel and resources to provide for the medical needs of the whole community during a disaster.
 - If you missed any of the Medicare Learning Network National Call on the EP Rule, you can access the PowerPoint [slides, transcript, and audio recording here](#).

I. Homecare and Hospice-Specific Planning Resources

Please review the Plans, Tools, and Templates section of the [ASPR TRACIE Homecare and Hospice Topic Collection](#) for additional plans and templates. The items below only provide as short list of resources.

Centers for Disease Control and Prevention. (2016). [Long-Term, Home Health, and Hospice Care Planning Guide for Public Health Emergencies](#).

This planning guide is geared towards long-term care, homecare, and hospice providers and is comprised of six sections: situational awareness, continuity of operations, facility or agency operations, crisis standards of care, staffing, and fatality management.

Louisiana Department of Health. (2017). [Louisiana Model Hospice Agency Emergency Plan](#).

This template is compliant with the CMS EP Rule and NIMS. It is provided to hospice agencies as a template for developing their emergency operations plan. Tab 11 provides patient necessary items for home health/hospice in the event of an evacuation and may be

helpful for the subsistence needs policy. Other helpful Annexes include D, Loss of Water, and E, Electrical Power Outages.

Michigan Department of Health and Human Services. (2015). [Home Health Emergency Preparedness: A Handbook to Assist Home Health Care Providers in Emergency Preparedness Planning.](#)

This handbook was written to help Michigan home care agencies develop and evaluate their emergency preparedness plans. Beginning in Chapter 3 it helps users define plan elements, assess their agency's level of preparedness (with the included checklist), develop a plan that addresses specific needs and populations, and test and evaluate the plan. Page 34 provides Shelter In Place recommendations and page 28 addresses evacuations.

Montgomery County Advanced Practice Center for Public Health Emergency Preparedness and Response. (2007). [Emergency Preparedness Checklist for Case Management and Home Care Services.](#)

This checklist was created to ensure that clients receiving home care and case management services in Montgomery County (MD) develop an emergency plan and stock a 72 hour (or longer) supply of nine essential items (e.g., water, food, hygiene items, and clothes). Page 6 also includes additional items to consider for home health patients. The checklist can be replicated by others, and can also be added to a client's chart.

National Hospice and Palliative Care Organization (NHPCO). (2017). [Emergency Preparedness for Hospice Providers.](#)

This document provides a general overview of disaster response/ emergency preparedness specific to hospice care. It addresses requirements in the *CMS Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers* specific to hospice providers.

Below is an excerpt from this NHPCO document that is a summary of what is in the CMS EP Rule that we believe should be highlighted:

For hospice-operated inpatient care facilities, the CMS Rule notes the provision of subsistence needs for hospice employees and patients, whether you evacuate or shelter-in-place include, but are not limited to:

- *Food, water, and medical supplies to include oxygen*
- *Alternate sources of energy to maintain:*
 - *Temperatures to protect patient health and safety and for the safe and sanitary storage of provisions*
 - *Emergency lighting*
 - *Fire detection, extinguishing, and alarm system*
- *Sewage and waste disposal*

Virginia Department of Health, Office of Licensure and Certification. (2006). [Emergency Preparedness Planning for Hospice and Home Care Providers](#).

This document provides clear, concise emergency plan guidance for hospice and homecare providers in Virginia (but it can be used by those in other states). Page 5 includes a list of emergency preparedness information for clients and recommended supplies.