Navigating the Maze of Guidelines and Requirements for Preparedness in Long-Term Care Settings

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Long Term Care (LTC) Navigating CMS Requirements Learning Objectives

Objectives

- Identify key stakeholders and partners to pursue effective preparedness planning
- Address CMS emergency preparedness efforts and healthcare facility regulation
- Assess immediate long term care bed availability and assess the gap between what hospitals expect and what capacity is available during disasters

- Assess state resources for mass casualty and surge planning, key partners and ways to overcome barriers to effective preparedness, especially in no-notice disasters
- Identify cross-benefits from statewide aging collaborations that result in additional funding opportunities
KY Preparedness Efforts for LTC

- KY Health Care Preparedness Coalitions
- KY Emergency Preparedness for Aging Program
- Key stakeholders and partners
- Kentucky Department for Public Health
- Long Term Care state associations
- KY Hospital Association
- KY Division of Emergency Management
- KY LTC Ombudsman Program
- American Red Cross
- ESF #8

KY Hospital Preparedness Program Regions

Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers

- Executive Summary
  - "...current emergency preparedness regulatory requirements are not comprehensive enough to address the complexities of actual emergencies
  - Healthcare providers are not prepared to protect the health and safety of persons they are responsible for
  - Inconsistent regulatory approaches across agencies and jurisdictions

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Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers

- Among the requirements is a provision for each LTC facility to have a surge plan for medical surge and community surge
- Surge occurs when health care facilities need to evacuate to other health care facilities

KY LTC Surge Planning—Triggering Events

- Immediate hosting of persons is needed—LTC facility or hospital evacuation
- Regional event resulting in multiple facility evacuations
- Infrastructure and transportation routes are impacted limiting travel due to road conditions and/or weather conditions
- Transportation resources are limited, example: EMS resources are overwhelmed and transport over extended distances is impractical

Another Reason Surge is Important---to KY

Image courtesy of U.S. Geological Survey
Immediate Surge Need

- Federal and state disaster policymakers look to long-term care (LTC) facilities to provide shelter for hospitals and other LTC facilities during disasters.
- Immediate LTC response to LTC
- HPP 2012 Medical Surge Capability Performance Measure: Ability (of coalitions) to provide no less than 20% bed availability of staffed member beds, within 4 hours of a disaster.

Source: Immediate Bed Availability: Surge Capacity for Today’s Healthcare System; Richard C. Hunt, MD, FACEP; Office of the Assistant Secretary for Preparedness and Response.

Medical Surge

"Medical Surge describes the ability to provide adequate medical evaluation and care in events that severely challenge or exceed the normal medical infrastructure of an affected community (through numbers or types of patients)."

https://www.phe.gov/Preparedness/planning/mscc/handbook/Pages/appendixd.aspx

KY Hospital Immediate Surge

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Long Term Care (LTC) Surge Planning

- CMS Proposed Ruling
- Immediate long term care bed availability
- The gap between what hospitals and LTC need and what capacity is available during disasters
- LTC to LTC evacuation support
- Hospitals’ need for surge support
- KY LTC available beds

Barriers to LTC Surge Planning

- Insufficient LTC open beds
- Barriers to effective preparedness, especially in no-notice disasters
- Lack of Hazard Vulnerability Analyses (HVAs)
  - Know your facility risks
- CMS Requirements vs. State Needs

KY LTC Surge Process

- Surge Planning is a Process:
  - Pre-planning facility surge capacity in advance of a request to host evacuees
  - Consider the scope of surge the facility is open to negotiating
  - Review the key issues of concern to the licensing entity (KY OIG)
KY LTC Surge Process

- Surge Planning is a Process:
  - Negotiate final surge agreement with the sending facility
  - Be clear about exactly what resources the sending facility will provide
  - Contact local Emergency Manager if additional resources are needed
  - Notify the state licensing agency of a completed surge agreement by both sending LTC and receiving LTC

KY LTC Surge Planning - A Solution

- Be clear about your objective
- Medical Surge is different from Community Surge
- Have Mutual Aid Agreements with hospitals and other LTC facilities

KY LTC Surge Planning - A Solution

- 3 Levels of Medical Surge
  - Conventional Surge
  - Contingency Surge
  - Crisis Surge

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LTC Surge Planning—Conventional Surge

- Receiving facility agrees to provide temporary hosting to LTC or other health care facility evacuees for up to 3 - 4 days.
- Stress on the receiving site is minimal as normal operations continue.
- Sending facility sends staff, records, medications, resident charts, beds if possible, special equipment for residents, etc.
- Requires notification to the OIG — You are not admitting new residents.

LTC Surge Planning—Conventional Surge

- Establish the surge area using Life Safety Guidelines
- Identify available beds that could be used for short term (3 to 4 days) evacuee hosting
- Do not consider beds that are being held for a confirmed admission.
- Identify available rooms by gender, level of care and payor source.
- Identify the levels of care facility is not willing to receive.

LTC Surge Planning—Contingency Surge

- Additional bed capacity is created by converting single rooms to doubles and doubles to triples using Life Safety Guidelines
- Room size guidelines
- Realize this creates stress on daily provision of care and resources in receiving facility
- Will need resources from sending facility
- Resources include County Emergency Manager and regional Health Care Preparedness Program.
LTC Surge Planning—Crisis Surge

- Additional bed capacity is created by putting extra beds, cots, mattresses on the floor in usual non-sleeping areas using Life Safety Guidelines
- Assess bed capacity in non-sleeping areas
- Creates stress on daily provision of care, may need to shift into crisis standards of care
- Need for resources from sending facility and possibly the county/regional Emergency Manager and regional/state Health Care Preparedness Program

LTC Surge Space Assessment

- Review facility floor plans
  - Existing Rooms
  - Non-sleeping rooms
  - Identify Access and Egress points
  - Apply Life Safety Space Requirements

- Ensure all surge bed arrangements will be free of impeding egress or access
- Maintain three (3) feet between beds. Adjust as necessary if using cots
- Maintain four (4) foot egress paths to the exit/access corridor
- Maintain 1.5 – 2 feet between the perimeter wall and the side of a bed
- Area must be free around "red plugs"
- Include privacy dividers between beds, cots or mattresses

Adapted from the Influx of Residents/Surge Guidelines for Nursing Homes (Best Practice Guide) created for Long Term Care in Kentucky in March 2014 by Russell Phillips & Associates.

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LTC Surge Space Assessment

LTC Surge Planning

Primary Agencies for LTC Surge
- KY Office of the Inspector General (OIG)
- KY Long Term Care Ombudsman Program
- KY Long Term Care Facilities
- KY Emergency Management (KYEM); County EM; Regional EM; State EM
- KY Department for Public Health (KDPH)
- KY Emergency Medical Services (EMS)

LTC Surge Planning—Mass Casualty Planning
- State resources for mass casualty planning
- State Dept. for Public Health
- State LTC Licensing Agencies
- LTC Ombudsman Programs
- State Hospital Preparedness Programs
- State Emergency Management
- State Board of Emergency Medical Services

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Partnerships Lead to Additional Funding—All Emergencies Start Local

- Leverage your relationships
- Be part of Regional Health Care Coalitions (HPP)
- Include your Area Agencies on Aging
- Look to county resources, incl. Emergency Managers and County Judges/Mayors
- Expand your target groups
- Find out what complementary groups are doing
- Establish new partnerships
- Create new products

It takes a Community to be Resilient

Don’t underestimate the value of what you do and those you serve!

More Information

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