

Emergency Exercise

On September 25, 2020, the Centers for Medicare & Medicaid Services (CMS) communicated an exemption to the emergency preparedness regulations based on an actual, natural, or man-made emergency. The emergency preparedness regulations allow an exemption for providers or suppliers that experience a natural or man-made event requiring activation of their emergency plan. **Facilities that activate their emergency plans are exempt from the next required full-scale community-based or individual, facility-based functional exercise.** Facilities must be able to demonstrate, through written documentation, that they activated their program due to the emergency. For the “exercise of choice,” facilities must conduct one of the following testing exercises: *another full-scale exercise; Individual-facility-based functional exercise; Mock disaster drill; or a tabletop exercise or workshop.*

To support ICF/IID facilities the Office of Developmental Programs (ODP) is inviting all ICF locations to participate in a virtual table-top exercise (TTX). A tabletop exercise involves key personnel discussing simulated scenarios in an informal setting. TTXs can be used to assess plans, policies, and procedures. A tabletop exercise is a discussion-based exercise that involves senior staff, elected or appointed officials, and other key decision-making personnel in a group discussion centered on a hypothetical scenario. TTXs can be used to assess plans, policies, and procedures without deploying resources.

ODP will develop a TTX that will be a group discussion based and mediator facilitated exercise with the following expectations:

- This is an open, low-stress, no-fault environment. The discussions will explore policies, decisions, actions, and key relevant issues, which will require participants to respect the observations, opinions, and perspectives of others.
- Treat the scenario incidents as real.
- Respond based on your knowledge of current plans and capabilities (i.e., you may use only existing assets) and insights derived from training. Issue identification is not as valuable as suggestions and recommended actions that could improve response and preparedness efforts. Problem-solving efforts should be the focus.

To participate, facilities will be expected to bring facility specific decision-makers together and call into the TTX by a single phone line. An example would be facility participants calling in from a conference room that can support appropriate spacing requirements. Participants will be presented with several situation updates that summarize key events occurring within a time period. After the updates, participants will review the situation and engage in functional group discussions of appropriate response issues. At a minimum, for purposes of this exercise, the functional groups consist of the following facility representatives: *Facility Administration, Nursing Management, and Security/Support Staff.*

After these functional group discussions, participants will be directed to engage in a facilitated caucus discussion in which a spokesperson from each group will present a synopsis of the group’s actions, based on the scenario, to the larger exercise group. Upon termination of exercise a facilitated and mediated Hot-Wash will be conducted. The Hot-Wash will ask you to: identify your facilities top three (3)

strengths, identify your facilities top three (3) areas requiring improvement, and provide any additional remarks/comments. Though not required, facilities will be provided with information to help identify facility specific recommendations/actions steps and provide constructive feedback on the exercise itself.

As a reminder, all facilities must continue to analyze their facility's response to and maintain documentation of all drills, tabletop exercises, and activation of their emergency plan. This would include documentation showing any revisions to the facility's emergency plan as a result of the after-action review process.

ODP is requesting that facilities wishing to participate contact RA-PWODPEMRGNCYRSPRQ@pa.gov no later than June 1, 2021. Additionally, to help guidance exercise development, please identify which of the following scenarios are a preferred exercise topic for that location:

1. Severe Thunderstorm
2. Chemical Spill
3. Winter Storm
4. Missing Resident
5. Staffing capacity crisis

CMS References:

- QSO-20-41-ALL
- State Operations Manual, Appendix Z

Questions about the referenced CMS guidance should be directed to your DOH life-safety licensing representative or QSOG_EmergencyPrep@cms.hhs.gov.

Questions about the ODP TTX should be directed to your ODP regional office or RA-PWODPEMRGNCYRSPRQ@pa.gov.