

Highlights from the Department for Health and Human Service (DHHS) Office of Inspector General (OIG) Report on Gaps in Long Term Care (LTC) Preparedness

Six years after its 2006 post-Katrina report, the Office of Inspector General of DHHS has issued a follow-up report on nursing home emergency preparedness. The new report looks at LTC compliance with current regulations regarding emergency preparedness, plans and staff training. It also examines LTC use of the CMS recommendations in the “***CMS Emergency Preparedness Checklist for Health Care Facilities***”.

The study found that some of the recommendations have been adopted by LTC facilities in the sample; however, no facility has adopted all the recommendations. Recognition was given to the LTC facilities that had adopted some of the regulations (up to 50%).

The study also found that state Ombudsman programs and state Survey Agencies had not used any of the recommendations to enhance their work. Recognition was given to the efforts of the Ombudsman program and state surveyors who exceeded regulatory expectations during disasters, including one state providing CMS waivers for a LTC host facility to exceed bed limits to receive a surge of evacuated residents.

The OIG report acknowledges that the recommendations included in the checklist have never become regulation and, therefore, compliance was voluntary. As a result, the OIG recommendations include:

- CMS revise Federal regulations to include six areas of concern: staffing tasks, resident-care tasks, resident identification, sheltering-in-place tasks, evacuation tasks, and communication and collaboration
- CMS provide guidance to surveyors in assessment of facility emergency plans and training
- CMS promote use of the Checklist for LTC, Ombudsman programs and Survey Agencies
- Admission on Aging (AOA) establish policies and procedures for resident safety and well-being during and after a disaster.

The *KY All Hazards LTC Emergency Planning and Resource Manual* includes a section specifically on the ***CMS Emergency Preparedness Checklist for Health Care Facilities*** and a crosswalk of the recommendations referencing relevant sections of the manual so existing plans can adopt all of the recommendations. We will be revising the manual to incorporate all recommended changes and clarifications.

2006 Post Katrina report: <http://oig.hhs.gov/oei/reports/oei-06-06-00020.pdf>

2012 OIG report: <http://oig.hhs.gov/oei/reports/oei-06-09-00270.asp>

CMS Emergency Preparedness Checklist for Health Care Facilities: <http://www.hah-emergency.net/Planning%20Tools/CMS%20Emergency%20Planning%20Guide%20DRAFT.pdf>.

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