



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Aging and Long-Term Support Administration
PO Box 45600, Olympia, Washington 98504-5600

October 8, 2020
Amended July 1, 2021

AL TSA: NH #2020-073
AL TSA: ICF/IID #2020-038

**AMENDED: QSO-20-41-ALL GUIDANCE RELATED TO EMERGENCY PREPAREDNESS
TESTING REQUIREMENTS-CORONAVIRUS DISEASE 2019 (COVID-19)**

Dear Nursing Facility/Home Administrator and ICF/IID Administrator:

On June 21, 2021 the Centers for Medicare and Medicaid Services (CMS) revised and published [QSO-20-41-ALL](#) to provide additional guidance and clarification on the Emergency Preparedness Exercise requirements due to the continued COVID-19 public health emergency. Revisions are in bold font.

- If the facility is still operating under its currently activated emergency plan, any currently-activated emergency plan will be recognized by surveyors as having met the full-scale exercise requirement for 2021 (even if it claimed the exemption for the 2020 full-scale exercise). This exemption applies to the full-scale exercise, not an exercise of choice. Facilities must be able to demonstrate with written documentation, that they activated their program due to the emergency.
- If the facility claimed the full-scale exercise exemption in 2020 based on its activated emergency plan and has since resumed normal operating status, the inpatient provider/supplier is expected to complete its required full-scale exercise in 2021, unless it has reactivated its emergency plan for an actual emergency during its 12-month cycle for 2021.

The memo noted that CMS released the revised State Operations Manual, Appendix Z on March 26, 2021, which is located at: https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_z_emergprep.pdf.

The Emergency Preparedness Surveyor Worksheet was revised and is attached to the revised QSO memo.

The guidance is effective immediately.

On September 28, 2020, the Centers for Medicare and Medicaid Services (CMS) issued a memorandum, [QSO-20-41-ALL](#), regarding emergency preparedness testing exemption and guidance in times of a Public Health Emergency.

CMS regulations for emergency preparedness require specific testing exercises be conducted to validate the facility's emergency program. CMS defines the testing exercises required under the emergency preparedness regulations in two categories: 1) Full-scale and individual facility-based functional exercises; and 2) Mock disaster drills, tabletop exercises, or workshops.

During or after an actual emergency, the regulations allow for an exemption to the testing requirements for providers that experience a natural or man-made event requiring activation of their emergency plan. On Friday, March 13, 2020, the President declared a national emergency due to COVID-19. Subsequently many providers and suppliers activated their emergency plans in order to address surge and coordinate response activities.

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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.

CMS requires facilities to conduct annually one of the following exercises of their choice: 1) Another full-scale exercise, 2) Individual facility-based functional exercise, 3) Mock disaster drill, 4) Tabletop exercise, or 5) Workshop.

Facilities may need to conduct an exercise of choice following the current Public Health Emergency if they were required to conduct such an exercise this year and did not already do so.

Thank you for your continued commitment to resident health and safety. If you have any questions, please contact Lisa Herke, Nursing Home Policy Program Manager at (509) 209-3088 or lisa.herke@dshs.wa.gov.

Sincerely,



Mike Anbesse, Director
Residential Care Services

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