# Training and Exercise Plan

Federally Qualified Health Center’s and Primary Care Clinics are required to conduct and annual emergency preparedness staff training every two years and one emergency preparedness table-top exercise annually. This document allows organizations to plan, identify key staff and external partners, plan emergency preparedness trainings and exercises over the course of the year. Trainings and exercise activities can be scheduled either monthly or quarterly, whichever works for your organization.

## Internal and External Training and Exercise Committees

<insert name of Internal and External Training and Exercise Committees. Delete instructions in RED>.

**<insert Organization’s name>** internal stakeholders listed are involved in development of this Training and Exercise Plan

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| --- | --- | --- | --- | --- |
| **Name** | **Department** | **Title** | **Contact Information** | **Training or Exercise Role** |
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**<insert Organization’s name>** external stakeholders listed are involved in the development of this Training and Exercise Plan

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| **Name** | **Department** | **Title** | **Contact Information** |
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**Monthly or Quarterly Training and Exercise Calendar**

Insert the date of all planning sessions other pertinent training and exercise information. The Training and Exercise Committee Schedule will meet as follows:

|  |  |  |  |
| --- | --- | --- | --- |
| **Training and Exercise Dates** | **Meeting Time** | **Location** | **Purpose** |
| January |  |  |  |
| February |  |  |  |
| March |  |  |  |
| April |  |  |  |
| May |  |  |  |
| June |  |  |  |
| July |  |  |  |
| August |  |  |  |
| September |  |  |  |
| October |  |  |  |
| November |  |  |  |
| December |  |  |  |

**Quarterly Training and Exercise Calendar**

The Training and Exercise Committee Schedule will meet as follows:

|  |  |  |  |
| --- | --- | --- | --- |
| **Training and Exercise Dates** | **Meeting Time** | **Location** | **Purpose** |
| October |  |  |  |
| January |  |  |  |
| April |  |  |  |
| July |  |  |  |

<Chose whichever training calendar works for your organization and delete the other. Delete these instructions in RED.>

### What is a CMS defined Emergency Preparedness Training and Exercise Program?

Any organization contracting with the Centers for Medicare and Medicaid Services (CMS) must comply with the CMS Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers (42 CFR Parts 403, 416, 418, et al.).

CMS requires that healthcare providers develop and maintain an emergency preparedness training and exercise program that includes:

* Initial training for new and existing staff in emergency preparedness policies and procedures
* Annual refresher trainings
* Annual emergency preparedness training to confirm staff can demonstrate knowledge of emergency procedures
* A plan to conduct drills and exercises to identify gaps and areas for improvement

## Emergency Preparedness Training and Exercise Program

### An emergency preparedness training and testing (exercise) program is a cyclical process that begins with developing and updating your Risk Assessment (Hazardous Vulnerability Assessment) (HVA). Once the HVA is completed, the next phase includes writing, reviewing, and or revising your policy and procedures to support your Emergency Operations Plan (See Section #1 of this Emergency Management Program).

Organizations need to identify risks and develop and maintain an Emergency Preparedness Communications Plan. Organizations also need to conduct emergency preparedness exercises to “test” the plan to ensure plans, policies, and procedures work as planned. Utilizing an all-hazards approach will assist organizations in testing their capacities and capabilities to prepare for a broad range of events/disasters. As organizations conduct a variety of exercises over time, CMS healthcare providers can learn and adapt their plans based on the outcomes of these exercises and tailor their specific plans to better support their staff, patients, and program site needs. For organizations with multiple locations, such as multi-campus or multi-location hospitals, the organization’s training and testing program must be reflected in the organization’s risk assessment for each respective program site.

After conducting an exercise, organizations will complete the cycle by updating and/or revising their plans, policies, and procedures based on the exercise evaluations. After-Action Reviews (also referred to as a Hot Wash) provide organizations the opportunity to identify gaps, areas for improvement, lessons learned, and/or corrective actions. Once the cycle is completed, it will begin again with updating the Hazardous Vulnerabilities Assessment (HVA) and/or risk assessment.

### Four Core Elements of an Emergency Preparedness Program

CMS identified four core elements that are essential to an effective emergency preparedness program. These elements must be addressed to offer a more comprehensive framework of emergency preparedness requirements for the various Medicare and Medicaid participating providers and suppliers.

\*[pg. 63863 Federal Register/Vol. 81, No. 180/Friday, September 16, 2016/Rules and Regulations]

#### Four Core Elements

* Risk assessment and emergency planning
* Policies and procedures
* Communication plan
* Training and testing

## How do you decide what to test (a.k.a. exercise)?

#### Plans

* Is your Emergency Operations Plan (EOP) up to date?
* Have all sections of the EOP been exercised or activated in the past year?
* Are all policies and guidelines for a response to an emergency spelled out clearly in the EOP? (i.e., transportation/alternate shelter location and other mutual aid agreements, etc.)

#### Exercises

* Has the Emergency Operations Center (EOC) or Incident Management Team (IMT) been activated in the past year?
* Has your organization conducted your required CMS compliant exercises within the required period every 12 months?
* Has your organization participated in any exercises with partners agencies?
* Have improvements been made and documented from past exercises?
* Have notification/alternate warning systems been tested in the past year (either in an actual occurrence or an exercise)?

#### People

* Are all appropriate personnel (including new staff, leadership, elected officials, etc.) familiar with the EOP and its critical emergency preparedness elements?
* Are personnel familiar with their role in emergency operations?
* Do staff know where to access the most current emergency preparedness information?
* Do personnel possess the knowledge and skills necessary to respond as indicated in the EOP?
* Are personnel capable of managing their resource function(s) in an emergency?

### What does CMS say about exercises?

A CMS exercise program includes:

* Tabletop exercise (TTX)

As soon as the exercise is complete, and After-Action Review should be conducted as soon as possible to identify areas for improvement. A subsequent After-Action Report and Improvement Plan (IP) should follow and this provides the foundation for updating the policies and procedures. Healthcare entities are required to participate in or conduct and document annual training, and test plans with two annual exercises.

* **Training**: Conduct and document initial and annual training on your emergency preparedness plan, policies and procedures and other elements for all staff, patients, volunteers, and contractors.
* **Exercises**: Must conduct and document an annual tabletop exercise

An emergency management exercise is a way to test your plans, procedures, and training without waiting for an actual emergency to occur. Organizations have some flexibility and are not required to conduct a full-scale exercise as defined by FEMA or DHS’s Homeland Security Exercise and Evaluation Program (HSEEP). For the purposes of this requirement, a full-scale exercise is defined and accepted as any operations-based exercise (drill, functional, or full-scale exercise) that assesses a facility’s functional capabilities by simulating a response to an emergency that would impact the organization’s operations and their given community.”

An effective exercise program helps you maximize competence, resources, time, and funding by ensuring that exercises are part of a coordinated, integrated approach to building and sustaining your ability to respond to an event or disaster. An emergency preparedness best for organizations is to develop and follow a multi-year exercise program (see *Section 4: Multi – Year Training and Exercise Plan (TEP))* that enables them to plan and participate in a series of increasingly complex exercises and staff trainings.

### Why do we complete emergency preparedness exercises?

* Reveal planning weaknesses and gaps
* Improve coordination, collaboration, and communications
* Clarify roles and responsibilities
* Complete compliance with CMS exercise requirements

### How do we organize for these training and exercises?

Multi-year Training and Exercise Plan (TEP)

The [Homeland Security Exercise and Evaluation Program (HSEEP),](http://www.fema.gov/media-%20library-data/20130726-1914-25045-%208890/hseep_apr13_.pdf) developed by FEMA, includes a section on the establishment of a Training and Exercise Planning Workshop (TEPW). The TEPW section provides guidance for organizations in conducting an annual TEPW and developing a Multi-year Training and Exercise Plan in line with the HSEEP.

The **Training and Exercise Plan (TEP)** identifies a combination of exercises and related training requirements. These will address the emergency preparedness priorities identified by the organization. According HSEEP, “A progressive, multi-year exercise program enables organizations to participate in a series of increasingly complex exercises, with each successive exercise building upon the previous one until mastery is achieved. Regardless of exercise type, each exercise within the progressive series is linked to a set of common program priorities and designed to test associated capabilities.” Further, by defining training requirements in the planning process, organizations can address known shortfalls prior to exercising capabilities. HSEEP defines the types of exercises that could be included in your program.

## Ways to Engage Staff in Training and Exercises

#### Discussion-Based Exercises

Discussion-based exercises include seminars, workshops, tabletop exercises, and games. These types of exercises can be used to familiarize players with, or develop new, plans, policies, agreements, and procedures. Discussion-based exercises focus on strategic, policy-oriented issues. Facilitators and/or presenters usually lead the discussion, keeping participants on track towards meeting exercise objectives.

#### Seminars

Seminars generally orient participants to, or provide an overview of, authorities, strategies, plans, policies, procedures, protocols, resources, concepts, and ideas. As a discussion-based exercise, seminars can be valuable for entities that are developing or making major changes to existing plans or procedures. Seminars can be similarly helpful when attempting to assess or gain awareness of the capabilities of interagency or inter-jurisdictional operations.

Goals of a seminar exercise include:

* Orient participants to new or existing plans, policies, or procedures
* Research or assess interagency capabilities or inter-jurisdictional operations
* Construct a common framework of understanding

#### Workshops

Although similar to seminars, workshops differ in two important aspects:

* Participant interaction is increased, and the focus is placed on achieving or building a product. Effective workshops entail the broadest attendance by relevant stakeholders.
* Products produced from a workshop can include new standard operating procedures (SOPs), emergency operations plan, continuity of operations plans, or mutual aid agreements. To be effective, workshops should have clearly defined objectives, products, or goals, and should focus on a specific issue.
* Goals of a workshop:
* Develop new ideas, processes, or procedures
* Develop a written product as a group in coordinated activities
* Obtain consensus
* Collect or share information

#### Tabletop Exercises

A tabletop exercise (TTX) is intended to generate discussion of various issues regarding a hypothetical, simulated emergency. TTXs can be used to enhance general awareness, validate plans and procedures, rehearse concepts, and/or assess the types of systems needed to guide the prevention of, protection from, response to, and recovery from a defined incident. Generally, TTXs are aimed at facilitating conceptual understanding, identifying strengths and areas for improvement, and/or achieving changes in perceptions.

During a TTX, players are encouraged to discuss issues in depth, collaboratively examining areas of concern and solving problems. The effectiveness of a TTX is derived from the energetic involvement of participants and their assessment of recommended revisions to current policies, procedures, and plans. TTXs can range from basic to complex. In a basic TTX the scenario is presented and remains constant—it describes an event/disaster and exercise participants discuss the situation at hand based on their training, plans, and policies. A facilitator usually introduces and updates the original event/disaster by adding a new event or circumstance. Players discuss the issues raised by each problem and reference existing plans, policies, and procedures for direction.

* Goals of a tabletop exercise:
* Identify strengths and shortfalls
* Enhance understanding of new concepts
* Seek to change existing attitudes and perspectives

#### Games

A game is a simulation of operations that often involves two or more players, usually in a competitive environment, using rules, data, and procedures designed to depict an actual or hypothetical situation. Games explore the consequences of player decisions and actions. The decision-based format of a game incorporates “what if” questions that expand exercise benefits.

* Goals of a game:
* Explore the progressions and significance of decision-making
* Conduct "what-if" analyses of existing plans
* Test existing and potential strategies

#### Operations-Based Exercises

Operations-based exercises include drills, functional exercises (FEs), and full-scale exercises (FSEs). These exercises can be used to validate plans, policies, agreements, and procedures, clarify roles and responsibilities, and identify resource gaps. Operations-based exercises are characterized by actual reactions to an exercise scenario, such as initiating communications or mobilizing personnel and resources.

#### Drill

A drill is a coordinated, supervised activity usually employed to validate a specific function or capability in your organization. Drills are commonly used to provide training on new equipment, validate procedures, or practice and maintain current skills. For example, drills may be appropriate for activating the Incident Management Team (IMT) or Emergency Operations Center (EOC) personnel or test your recalling procedures to call employees to work for an event/disaster. Drills can also be used to determine if plans work as written or need to be updated, and whether more training is required. A drill is useful as a stand-alone tool, but a series of drills can be used to prepare several organizations to work together in an FSE. For every drill, clearly defined plans, procedures, and protocols need to be in place. Personnel need to be familiar with those plans and trained in the processes and procedures to be drilled. Drills involve a single function and involve actual deployment of resources and personnel.

#### Functional Exercises

Functional Exercises (FE) are designed to validate and evaluate capabilities, and multiple functions. FEs focus on exercising plans, policies, procedures, and staff members involved in management, direction, command, and control functions. In FEs, events are created using an exercise scenario with scenario updates that drive your actions to complete tasks needed to meet the objectives. An FE is conducted in a realistic, real-time environment; however, movement of personnel and equipment is usually simulated. FE controllers typically use a Master Scenario Events List (MSEL) to ensure participant activity remains within limits to ensure exercise objectives are accomplished. Simulators in a Simulation Cell (SimCell) can inject scenario elements to simulate real events. FEs involve multiple functions and use simulation of deployment of resources and personnel

### Full Scale Exercises

Full scale exercises (FSE) are typically the most complex and resource-intensive type of exercise. They involve multiple entities and will serve to validate your ability to respond to an event/disaster preparedness. FSEs often include many players working within the Incident Command System (ICS). In an FSE, events are created using an exercise scenario. Updates that drive activity at the operational level are fed into the scenario at specific times to create objectives to be accomplished. FSEs are usually conducted in a real-time, stressful environment that is intended to mirror a real incident. Personnel and resources may be mobilized and deployed to the scene. FSEs are intended to serve as an exercise program management and communications tool, which informs stakeholders and guides the development of future trainings and exercises.

## Exercise Documents Requirements

Whereas CMS does not require the creation of a specific type of document when developing your exercise, they do require you to document your two required exercises:

“Each facility is responsible for documenting their compliance and ensuring that this information is available for review at any time for a period of no less than three (3) years. Organizations should also document the lessons learned following their tabletop exercises, full-scale exercises, and real-life emergencies and demonstrate that they have incorporated any necessary improvements in their emergency preparedness program.”

#### Exercise Documents

Below are two exercise design and development documents that you can use to document your exercises. They are defined and identified in HSEEP.

* [After Action Review (AAR) and Improvement Plan (IP)](https://www.fema.gov/media-library/assets/documents/32326)

The After-Action Review (AAR) Improvement Plan (IP) summarizes the relevant and key information captured about the exercise and makes recommendations for improvements that can be made to your training, policies, and procedures.

### Training and Exercise Resources

The Federal Emergency Management Agency (FEMA) offers an [independent training program](https://www.fema.gov/media-library/assets/documents/32326) where you can take self-paced on-line training. If you don’t have one already, you will need to create a [FEMA Student ID](https://cdp.dhs.gov/femasid). FEMA’S [Emergency Management Institute (EMI)](https://training.fema.gov/emicourses/emicatalog.aspx) offers a variety of emergency management training.

#### Training Resources

* [Center for Domestic Preparedness](https://cdp.dhs.gov/)
* Local and state Emergency Management Office
* State Training Officer
* Local and State Public Health Offices
* Your Healthcare Coalition

### Suggested Training Courses

**On-line courses**

* [ICS 100 Introduction to the Incident Command System](https://training.fema.gov/is/courseoverview.aspx?code=IS-100.c)
* [ICS 200 Incident Command System for Single Resources and Initial Action Incidents](https://training.fema.gov/is/courseoverview.aspx?code=IS-200.c)
* [ICS 700 National Incident Management System](https://training.fema.gov/is/courseoverview.aspx?code=IS-700.b)
* [IS 230.d Fundamentals of Emergency Management](https://training.fema.gov/is/courseoverview.aspx?code=IS-230.d)
* [IS 235.c Emergency Planning](https://training.fema.gov/is/courseoverview.aspx?code=IS-235.c)

**In person courses**

* ICS 300: Intermediate Incident Command System for Expanding Incidents
* ICS 400: Advanced Incident Command System for Command and General Staff Complex Incidents
* G 0191: ICS/EOC Interface
* Advanced Public Information Officer
* NIMS ICS All-Hazards Incident Commander Course
* NIMS ICS All-Hazards Public Information Officer Course
* NIMS ICS All-Hazards Safety Officer Course
* NIMS ICS All-Hazards Operations Section Chief Course
* NIMS ICS All-Hazards Planning Section Chief Course
* NIMS ICS All-Hazards Logistics Section Chief Course
* NIMS ICS All-Hazards Finance/Administration Section Chief Course

### Incident Command System (ICS) Training Recommended Sequence

**All Emergency Management Practitioners**

* IS 0100: Introduction to the Incident Command System, ICS 100
* IS 0700: National Incident Management System (NIMS), An Introduction

**Emergency Management Supervisors**

* IS 0100: Introduction to the Incident Command System, ICS 100
* IS 0700: National Incident Management System (NIMS), An Introduction
* IS 0200: Incident Command System for Single Resources and Initial Action Incidents
* IS 0800: National Response Framework, An Introduction

**Advanced NIMS Training for ICS Leaders/ Supervisors**

* IS 0100: Introduction to the Incident Command System, ICS 100
* IS 0700: National Incident Management System (NIMS), An Introduction
* IS 0200: Incident Command System for Single Resources and Initial Action Incidents
* IS 0800: National Response Framework, An Introduction
* G 0191: ICS/EOC Interface
* E/L/G 0300: Intermediate ICS for Expanding Incidents
* E/L/G 0400: Advanced ICS for Command and General Staff
* NIMS ICS All Hazards Position Specific Courses (E/L/G 0949-0991)

### Emergency Operations Center (EOC) Training Recommended Sequence

**All Emergency Management Practitioners**

* IS 0100: Introduction to the Incident Command System, ICS 100
* IS 0700: National Incident Management System (NIMS), An Introduction

**Emergency Management Supervisors**

* IS 0100: Introduction to the Incident Command System, ICS 100
* IS 0700: National Incident Management System (NIMS), An Introduction
* IS 0775 or IS 2200 (in development) Basic EOC Management and Operations
* IS 0800: National Response Framework, An Introduction
* Advanced NIMS Training for EOC Leaders/ Supervisors
* G 0191 ICS/EOC Interface Workshop
* E/L/G 0775 or E/L/G 2300 (in development) Intermediate EOC Management and Operations

**Planning and Continuity of Operations plan (CoOP) Training**

* IS 394.a Protecting Your Home or Small Business from Disaster
* IS 546.a Continuity of Operations Awareness Course
* IS 547.a Introduction of Continuity of Operations
* IS 271.a Anticipating Hazardous Weather & Community Risk

