

Subject: Question re CMS Emergency Preparedness Rule
Date: Wednesday, July 26, 2017 at 2:57:31 PM Pacific Daylight Time
From: Karol, Susan (CMS/CMCS)
To: Laura Platero
CC: Marx, Kitty (CMS/CMCS), Miles Rudd, Blondiaux, Caecilia J. (CMS/CCSQ)

Good Afternoon Ms. Platero,
Thank you for your question at the STAC meeting this week in Missoula.

The CMS Medicare Emergency Preparedness Final Rule requirements impact the 17 provider types that we discussed during the CMS Medicare Emergency Preparedness Final Rule Webinar on May 18th, 2017. I have attached the provider list above and the recording of the Webinar appears on the CMS Division of Tribal Affairs website which can be viewed at this link: <http://www.cmsitustrainings.net/>

Basically, if an ambulatory health care clinic is “provider based” (bills through a hospital or Critical Access Hospital) or bills Medicare Part A, they are surveyed by CMS and must meet a number of Conditions of Participation (CoP) for Medicare reimbursement. They need to prepare to meet the Emergency Preparedness (EP) CoP by November 15, 2017.

If the ambulatory health care clinic is free standing and bills only Medicaid then they do NOT have to meet the EP CoP.

FQHC “look-alikes” that are free standing and bill only Medicaid do NOT have to meet the EP CoP. The Emergency Preparedness requirements only apply to those facilities that are registered as an FQHC *under Medicare*.

AAAHC accreditation status does not deem that the FQHC has met the Emergency Preparedness requirements. These sites will still need to focus on the EP requirements separately from any accreditation they may already have. It is anticipated that accrediting bodies may modify their emergency preparedness standards to align with these CMS requirements in the future.

If needed, an ambulatory healthcare clinic’s CEO may email Caecilia Blondiaux who is part of the CMS Survey and Certification Group in the Center for Clinical Standards and Quality (CCSQ) with their Medicare CCN Number. She will let them know if they must meet this CoP. I have added her to the email above.

I hope that is clearer. Please let me or Ms. Blondiaux know if we can be of any further assistance. Thank you for your email.

Sincerely,

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