

## Common Deficiency:

### Failure to conduct the 2<sup>nd</sup> Emergency Preparedness exercise annually

The regulations at 42 CFR §491.12(d)(2) requires Rural Health Clinic's (RHCs) to test its Emergency Preparedness plan by conducting two (2) exercises annually. The first exercise is a full-scale community-based exercise or when a community-based exercise is not available, an individual facility-based exercise. The second exercise can be a second full-scale exercise that is community-based or individual facility based OR a tabletop exercise that includes a group discussion led by a facilitator, using a narrated, clinically relevant emergency scenario and a set of problem statements, directed messages or prepared solutions designed to challenge an emergency plan. Some examples of a Tabletop Emergency Preparedness Exercise can be found at the FEMA website at [https://www.fema.gov/media-library-data/20130726-1917-25045-7806/cert\\_tabletops\\_combined.pdf](https://www.fema.gov/media-library-data/20130726-1917-25045-7806/cert_tabletops_combined.pdf)

In conclusion, RHCs must test their Emergency Preparedness plan by conducting two exercises per year. Please note that participation in the hospital's Emergency Preparedness exercise will count as only one exercise for provider based RHCs. In order to provide evidence of participation, RHCs must also maintain documentation of all exercises and emergency events.

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