



**State of Louisiana**  
Department of Health and Hospitals  
Office of the Secretary

October 8, 2019

To: ESF8 Response Network

From: Cecile Castello, RN  
Deputy Assistant Secretary  
Health Standards Section

A handwritten signature in black ink, appearing to read "Cecile Castello".

Subject: CMS Rule Changes

The recently released CMS rules issued September 30, 2019 relaxes the frequency of updating Emergency Preparedness plans from annually to every 2 years. Please note that LDH Health Standards' rules have not changed regarding Emergency Preparedness for annual update of the plan, the annual update of supporting components, the requirement for annual community exercises, as well as annual self-attestations for readiness as part of the annual license renewal application process

The location, scope and scale of any disaster is hard to predict. Annually updated plans, annually updated policies and procedures, and (a minimum) of annual engagement with emergency preparedness officials - prior to a disaster event - ensures that all facilities are postured for no-notice disaster events.

The frequency of severe weather to our state has increased. The nature of disasters is changing with compelling scientific evidence and studies indicating that the frequency, scope and scale of disasters is influenced by a changing climate. The last 3 years alone have demonstrated 'catastrophic' levels of disasters; namely, August 2016 flood disrupted as many homes as Katrina 2005; 2017 had 4 storms of a Category 4 or higher; and recently, Hurricane Dorian 2019 had 178mph winds (which exceeded Category 5 defined storm). Annual update of a facility's Emergency Preparedness Plan driven by exercises and drills assures that a facilities are prepared at all times.

Preparedness and Recovery is heavily dependent upon medical infrastructure being fortified and resilient. Annual community-based exercises are intended to advance preparedness at the facility and community level.

Exercises and updating the emergency plan ensures outreach to parish, state, federal and other critical stakeholders. These requirements are intended to advance transparency, as well as ensure a unified, scalable and integrated response during a time of disaster.