

**AAAASF RA/OPT Standards Comparison - CMS Burden Reduction required changes, effective March 2, 2020**

| <b>Standard #</b> | <b>Previous Standard (RA/OPT V2.3)</b>   | <b>Standard #</b> | <b>Updated Standard (RA/OPT V2.4)</b>   | <b>CMS Reference</b>   | <b>Identified Change</b>                              |
|-------------------|--|-------------------|---|------------------------|---|
| 1600.010.002      | Emergency plan. The Provider/Supplier must develop and maintain an emergency preparedness plan that must be reviewed and updated at least annually.  | 1600.010.002      | Emergency plan. The Provider/Supplier must develop and maintain an emergency preparedness plan that must be reviewed, and updated at least every two (2) years.   | 485.727(a) Standard    | Updated verbiage based on CMS Burden Reduction update |
| 1600.010.003      | The plan must be based on and include a documented, facility-based and community-based risk assessment, utilizing an all-hazards approach.   | 1600.010.003      | The plan must be based on and include a documented, facility-based and community-based risk assessment, utilizing an all-hazards approach.  | 485.727(a)(1) Standard | No change (reference point)                           |
| 1600.010.007      | The plan must include a process for cooperation and collaboration with local, tribal, regional, State, and Federal emergency preparedness officials' efforts to maintain an integrated response during a disaster or emergency situation, including documentation of the Provider/Supplier's efforts to contact such officials and, when applicable, of its participation in collaborative and cooperative planning efforts. | 1600.010.007      | The plan must include a process for cooperation and collaboration with local, tribal, regional, State, and Federal emergency preparedness officials' efforts to maintain an integrated response during a disaster or emergency situation.   | 485.727(a)(5) Standard | Updated verbiage based on CMS Burden Reduction update |
| 1600.010.009      | Policies and procedures. The Provider/Supplier must develop and implement emergency preparedness policies and procedures, based on the emergency plan set forth in standard 1600.010.002 of this section, risk assessment in standard 1600.010.003 of this section, and the communication plan in standard 1600.010.023 of this section. The policies and procedures must be reviewed and updated at least annually.         | 1600.010.009      | Policies and procedures. The Provider/Supplier must develop and implement emergency preparedness policies and procedures, based on the emergency plan set forth in standard 1600.010.002 of this section, risk assessment in standard 1600.010.003 of this section, and the communication plan in standard 1600.010.023 of this section. The policies and procedures must be reviewed and updated at least every two (2) years. | 485.727(b) Standard    | Updated verbiage based on CMS Burden Reduction update |
| 1600.010.023      | Communication plan. The Provider/Supplier must develop and maintain an emergency preparedness communication plan that complies with Federal, State, and local laws and must be reviewed and updated at least annually.   | 1600.010.023      | Communication plan. The Provider/Supplier must develop and maintain an emergency preparedness communication plan that complies with Federal, State, and local laws and must be reviewed and updated at least every two (2) years.   | 485.727(c) Standard    | Updated verbiage based on CMS Burden Reduction update |

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|-------------------|--|-------------------|---|-----------------------------|---|
| 1600.010.031      | Training and testing. The Provider/Supplier must develop and maintain an emergency preparedness training and testing program that is based on the emergency plan set forth in standard 1600.010.002 of this section, risk assessment in standard 1600.010.003 of this section, policies and procedures in standard 1600.010.009 of this section, and the communication plan in standard 1600.010.023 of this section. The training and testing program must be reviewed and updated at least annually. | 1600.010.031      | Training and testing. The Provider/Supplier must develop and maintain an emergency preparedness training and testing program that is based on the emergency plan set forth in standard 1600.010.002 of this section, risk assessment in standard 1600.010.003 of this section, policies and procedures in standard 1600.010.009 of this section, and the communication plan in standard 1600.010.023 of this section. The training and testing program must be reviewed and updated at least every two (2) years. | 485.727(d) Standard         | Updated verbiage based on CMS Burden Reduction update |
| 1600.010.033      | The training program must provide emergency preparedness training at least annually.   | 1600.010.033      | The training program must provide emergency preparedness training at least every two (2) years.   | 485.727(d)(1)(ii) Standard  | Updated verbiage based on CMS Burden Reduction update |
| 1600.010.034      | The training program must maintain documentation of all emergency preparedness training.   | 1600.010.034      | The training program must maintain documentation of all emergency preparedness training.  | 485.727(d)(1)(iii) Standard | Standard number updated                               |
| 1600.010.035      | The training program must demonstrate staff knowledge of emergency procedures.   | 1600.010.035      | The training program must demonstrate staff knowledge of emergency procedures.  | 485.727(d)(1)(iv) Standard  | Standard number updated                               |
| N/A               | N/A  | 1600.010.036      | If the emergency preparedness policies and procedures are significantly updated, the Provider/Supplier must conduct training on the updated policies and procedures.  | 485.727(d)(1)(v) Standard   | New standard based on CMS Burden Reduction            |
| 1600.010.036      | Testing. The Provider/Supplier must conduct exercises to test the emergency plan at least annually.  | 1600.010.037      | Testing. The Provider/Supplier must conduct exercises to test the emergency plan at least annually.   | 485.727(d)(2) Standard      | Standard number updated                               |

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|-------------------|---|-------------------|---|---|---|
| 1600.010.037      | The Provider/Supplier must participate in a full-scale exercise that is community-based or when a community-based exercise is not accessible, an individual, facility-based. If the Provider/Supplier experiences an actual, natural or man-made emergency that requires activation of the emergency plan, the Provider/Supplier is exempt from engaging in a community-based or individual, facility-based full-scale exercise for 1 year following the onset of the actual event. | 1600.010.038      | The Provider/Supplier must participate in a full-scale exercise that is community-based every two (2) years; or<br><br>When a community based exercise is not accessible, conduct a facility-based functional exercise every two 2) years; or<br><br>If the Provider/Supplier experiences an actual natural or manmade emergency that requires activation of the emergency plan, the Provider/Supplier is exempt from engaging in its next required community-based or individual, facility-based functional exercise following the onset of the emergency event.   | 485.727(d)(2)(i) Standard<br>485.727(d)(2)(i)(A) Standard<br>485.727(d)(2)(i)(B) Standard                                     | Updated verbiage based on CMS Burden Reduction update |
| 1600.010.038      | The Provider/Supplier must conduct an additional exercise that may include but is not limited to following: (A) A second full-scale exercise that is community-based or individual, facility-based. (B) 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 questions designed to challenge an emergency plan.                     | 1600.010.039      | The Provider/Supplier must conduct an additional exercise at least every two (2) years, opposite the year the full-scale or functional exercise (standard 1600.010.038) is conducted, that may include, but is not limited to the following:<br>A) A second full-scale exercise that is community-based, or an individual, facility-based functional exercise; or<br>B) A mock disaster drill; or<br>C) A tabletop exercise or workshop that is led by a facilitator and includes a group discussion using a narrated, clinically relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan. | 485.727(d)(2)(ii) Standard<br>485.727(d)(2)(ii)(A) Standard<br>485.727(d)(2)(ii)(B) Standard<br>485.727(d)(2)(ii)(C) Standard | Updated verbiage based on CMS Burden Reduction update |
| 1600.010.039      | The Provider/Supplier must analyze the Provider/Supplier's response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the Provider/Supplier's emergency plan, as needed.  | 1600.010.040      | The Provider/Supplier must analyze the Provider/Supplier's response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the Provider/Supplier's emergency plan, as needed.  | 485.727(d)(2)(iii) Standard   | Standard number updated                               |