

Palm Beach County

# **CEMP Program Workshop**

## **Common Mistakes and How to Fix Them**

Together, Emergencies Are Managed



# Agenda

- Common Mistakes in Healthcare CEMPs
- How to Fix these Common Mistakes

# Objectives

- Understand what the most common mistakes made on submissions are.
- Learn how to fix the common mistakes.

# Note:

- This Presentation is held to assist you in compliance with:
- Florida Administrative Code: 27P-20, 59A-3.078, 59A-4.126, 59A-4.1265, 59A-5.018, 59A-16.107, 59A-16.107(10), 59A-26.020, 59A-36.019(1), 59A-36.019(2), 59A-36.025, 59A-36.025(2), 65E-9.005(10), 65G-2.010
- Florida Statutes: §252.38(e), §393.067(8), §394.879(1)(d), §395.1055, §395.1055(1)(c), §400.23(2)(g), §400.967, §400.967(2)(g), §400.998(3)(g), §400.9982(2)(e), §429.929(1)(g), §429.41(1), §429.41(1)(b)

# Part 1

## Common Mistakes



# **COMMON MISTAKE 1:** **Lack of Consistency**

The most common reason for rejections are plans that are missing required information or provide contradictory information across different sections.



# **COMMON MISTAKE 1:** **Lack of Consistency**

Examples:

- Information that is stated in one section of the plan does not match information provided elsewhere.
  - Your facility's transportation procedure defines Company A and Company B, however only Company A is listed as a vendor in appendix.
  - The Introduction section is updated to reflect the hiring of a new Facility Administrator, but the Organizational Chart still lists the previous Facility Administrator.



# **COMMON MISTAKE 1:** **Lack of Consistency**

More Examples:

- The Crosswalk states where a reference document is, such as a floor plan, but the plan does not include the same reference.
- The Crosswalk states the location of a document, while the actual document is located somewhere else in the plan.
- The plan is missing specific documents that are required, such as a current Fire Plan approval letter.





## **COMMON MISTAKE 2:** **Not Including the Administrator's Approval Letter**

A cover letter is not included when a plan or plan updates are sent in, or the cover letter that is sent in is missing required information.

Examples of missing information:

- Letter does not clearly approve the plan
- Letter does not clearly explain the changes made to the plan



# COMMON MISTAKE 3:

## Section I Item 4

### The Administrator & Alternate Administrator

The plan does not include all of the required information

- BOTH the *Administrator* and the *Alternate Administrator*

4	Name, address, work and home telephone number, of the <b>Administrator</b> . Name, address, work and home telephone number, of the <b>Alternate Administrator</b> .	Facility Input		
For DEM use only				

## **COMMON MISTAKE 4:**

### **Charts**

#### **Section I Item 7**

### **Organizational Charts**

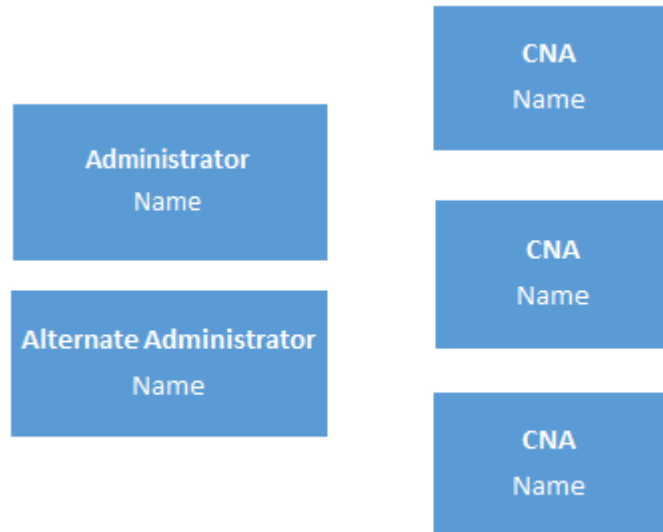
- The organizational chart is missing required information.
  - Key positions are not included with a name.
  - Phone numbers are missing from the chart (depending on your facility CEMP criteria).
- The chart is not legible.
- The chart does not reflect positions described in the plan or conflicts with information stated elsewhere in the plan (Lack of Consistency!).

# COMMON MISTAKE 4:

## Section I Item 7

### Organizational Charts

Examples of BAD organizational charts.



Issues:

- 1) Unclear who is in charge
- 2) Unclear who reports to whom

Name	Position	Phone Number
Amy	Administrator	(XXX)-XXX-XXXX
Michael	Assistant Administrator	(XXX)-XXX-XXXX
Keith	Maintenance Director	
Justin	Dietician	(XXX)-XXX-XXXX
Dearmayl	Medical Director	
Mary	CNA	(XXX)-XXX-XXXX
Dennis	CNA	

Issues:

- 1) Hierarchy ranks in organization is not clear
- 2) Phone numbers are missing
- 3) Unclear who reports to whom

# COMMON MISTAKE 4: Section I Item 7 Organizational Charts



Name	Position	Phone Number
Amy	Administrator	(XXX) XXX-XXXX
Michael	Assistant Administrator	(XXX) XXX-XXXX
Keith	Maintenance Director	
Justin	Dietician	(XXX) XXX-XXXX
Dearmay	Medical Director	
Mary	CNA	(XXX) XXX-XXXX
Dennis	CNA	

Don't make charts like these!

# **COMMON MISTAKE 5:**

## **Section III**

### **Hierarchy of Authority**

The plan does not define a hierarchy or the organizational chart is referenced, but does not clearly show the hierarchy.

- Often there is confusion of what a “hierarchy of authority” is.



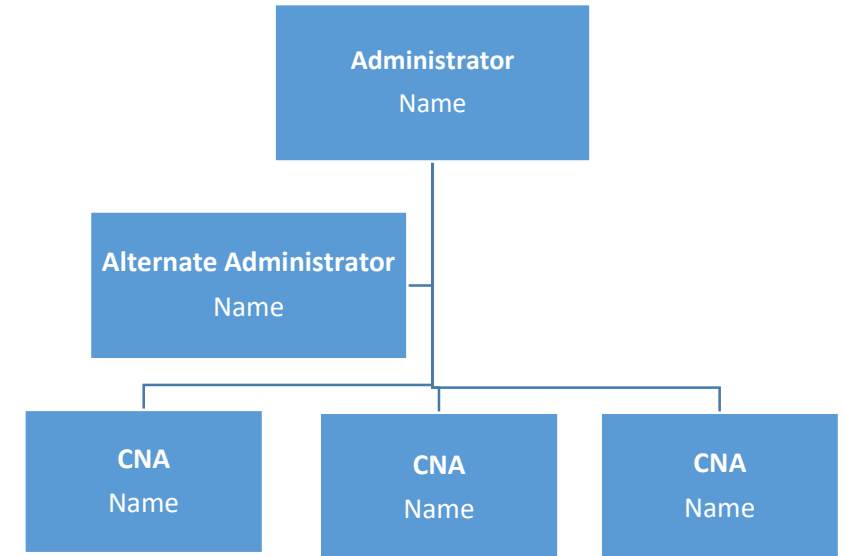
# COMMON MISTAKE 5: Examples of Hierarchy of Authority

## BAD Examples Hierarchy of Authorities

- 1) Local City Manager
- 2) Owners
- 3) Administrator

### Issues:

- 1) Hierarchy includes individuals who do not work at the facility
- 2) Hierarchy includes local government
- 3) Hierarchy does not name individuals

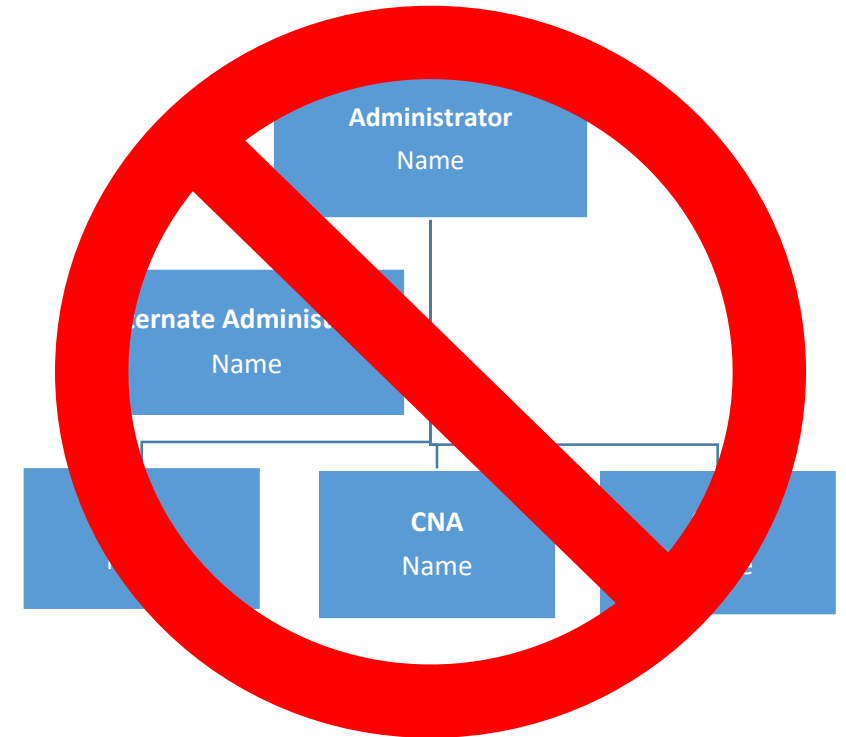
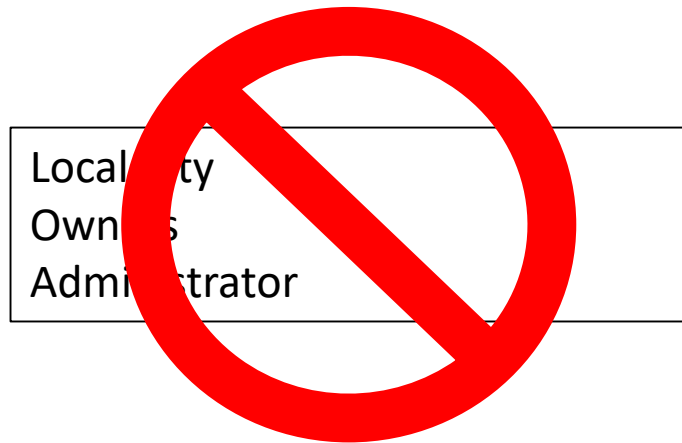


### Issues:

- 1) Hierarchy does not clearly state the three individuals in sequential order

# COMMON MISTAKE 5: Examples of Hierarchy of Authority

BAD Examples Hierarchy of Authorities



Don't make charts like these!



## **COMMON MISTAKE 6:**

### **Section IV**

### **Chain of Command**

The plan does not define a clear line of command or the organizational chart is referenced, but it does not clearly identify the top three individuals in the chain of command.

- This item is often confused with hierarchy of authority or the organizational chart (and sometimes both).



# COMMON MISTAKE 6: Section 4 Subsection A Item 2 Chain of Command

## BAD Examples of Chain of Commands

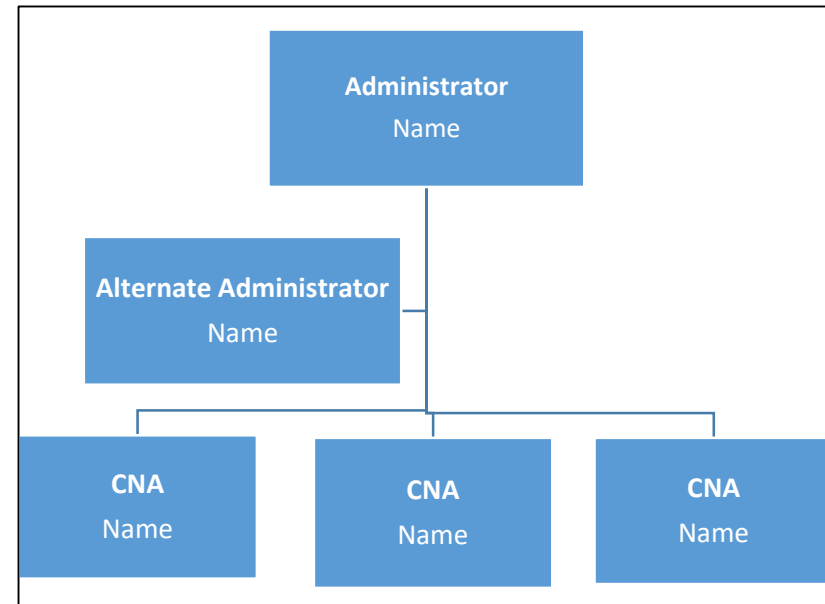
“See Organizational Chart” **A**

- 1) Administrator **B**
- 2) Alternate Administrator

- 1) Local City Manager
- 2) Owners
- 3) Administrator **C**

### Issues:

- 1) None clearly state 3 individuals
- 2) Box **A** references a chart that may not provide the clear line of authority
- 3) Box **B** does not list at least three individuals
- 4) Box **C** includes local government and individuals that may not work at the facility

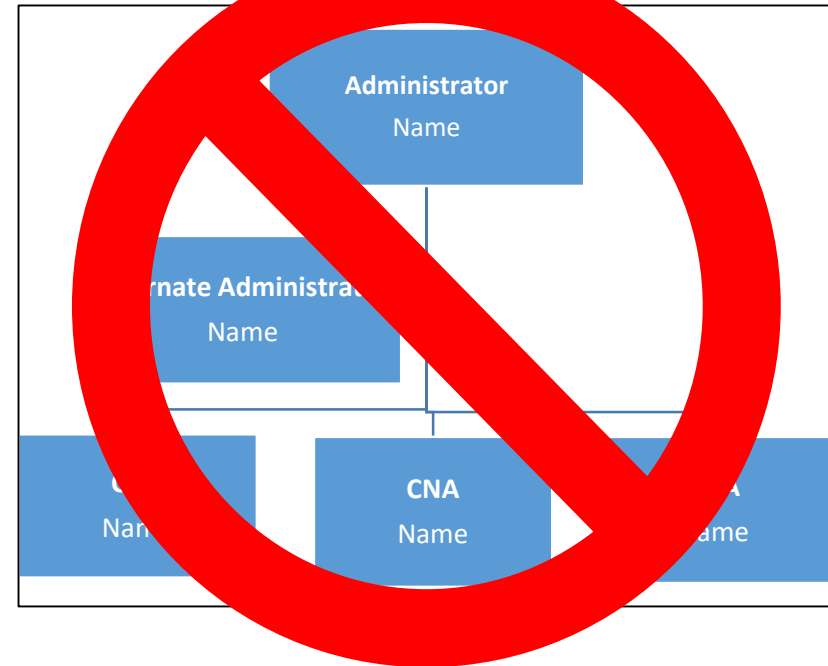
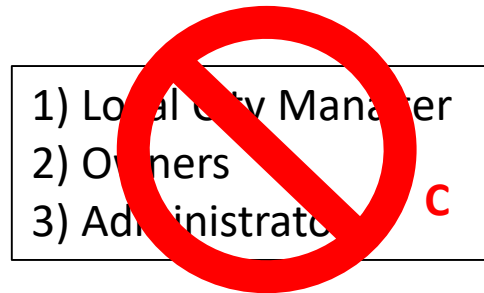
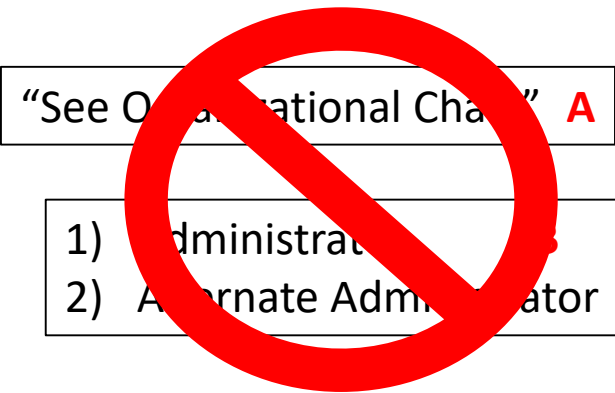


### Issues:

- 1) Chart does not clearly show the top 3 individuals who are in charge and their order of authority.

# COMMON MISTAKE 6: Section 4 Subsection A Item 2 Chain of Command

BAD Examples of Chain of Command



Don't make charts like these!

# COMMON MISTAKE 7: **Floorplans**

While there are four places where floor plans are required and these may be combined, a common mistake is to assume they are always interchangeable.

Examples:

- Not identifying map locations in the crosswalk or plan
- Unlabeled maps
- Missing maps



## **COMMON MISTAKE 8:**

### **Section III**

#### **Subsection B Item 5**

*“Proximity of the facility to a railroad or major transportation artery (per hazardous materials incidents).”*

- The information provided is incomplete.
  - Missing distance to roads or railroads.
- The information is not clearly stated.
  - The correct information may be listed, but not in an understandable format.
  - Inconsistency in Plan aka Common Mistake #1!

## **COMMON MISTAKE 9:**

### **Section V**

### **Information, Training, and Exercises**

- Exercises and drills are confused with trainings.
- A schedule is not provided for either trainings or exercises
- Trainings and exercises listed only cover specific hazards, such as fires or hurricane evacuations.
- Correction of deficiencies noted during exercises is focused on the employee's knowledge and ability to execute the plan.

# Part 2

## How To Fix Them!



## **How to Fix COMMON MISTAKE 1:** **Lack of Consistency**

- Use a Table of Contents and numbered pages to map and track content – especially for items in the Appendix.
- Use the CEMP Template posted on PBC DEM website to organize plan into same pattern as Crosswalk.
  - Currently only available for Adult Day Care and Assisted Living Facilities.
- Divide the plan binder with Tabs.
  - This splits the plan into manageable sections, plus it is easier to reference other pages (such as vendor agreements or evacuation maps).
- When updating plan or writing a new one – double check to make sure all information is accurate *and* consistent!

***Inconsistency is the Number 1 reason for failed plans!***



## **How to Fix COMMON MISTAKE 2:** **Not Including the Administrator's Approval Letter**

- Include a cover letter!
- Provides Division of Emergency Management with a point of contact should we have any questions with the plan.
- Identifies any changes that may be confusing or not easily identified based on the included documents.

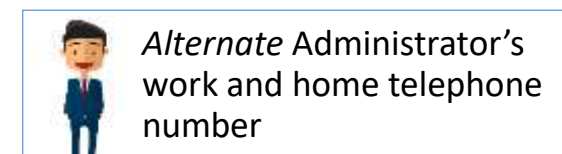
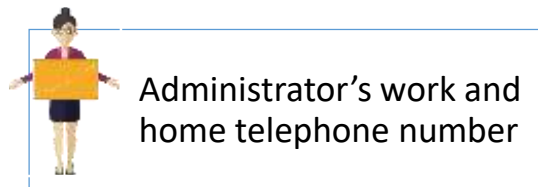
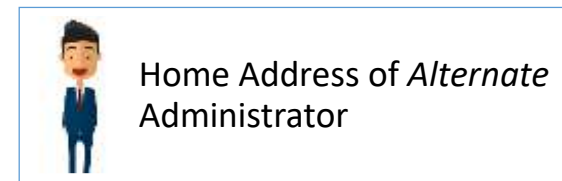
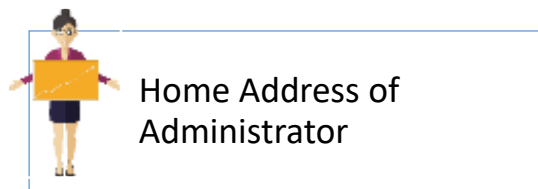
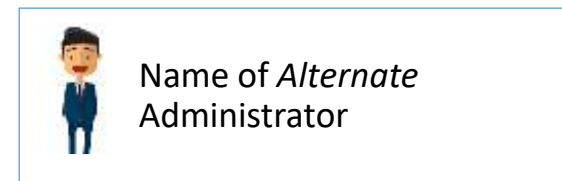
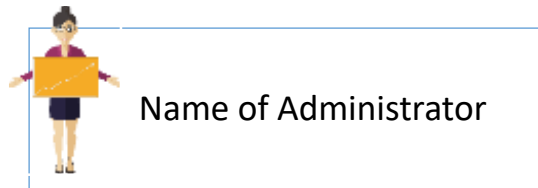


# How to Fix COMMON MISTAKE 3:

## Section I Item 4

### The Administrator & Alternate Administrator

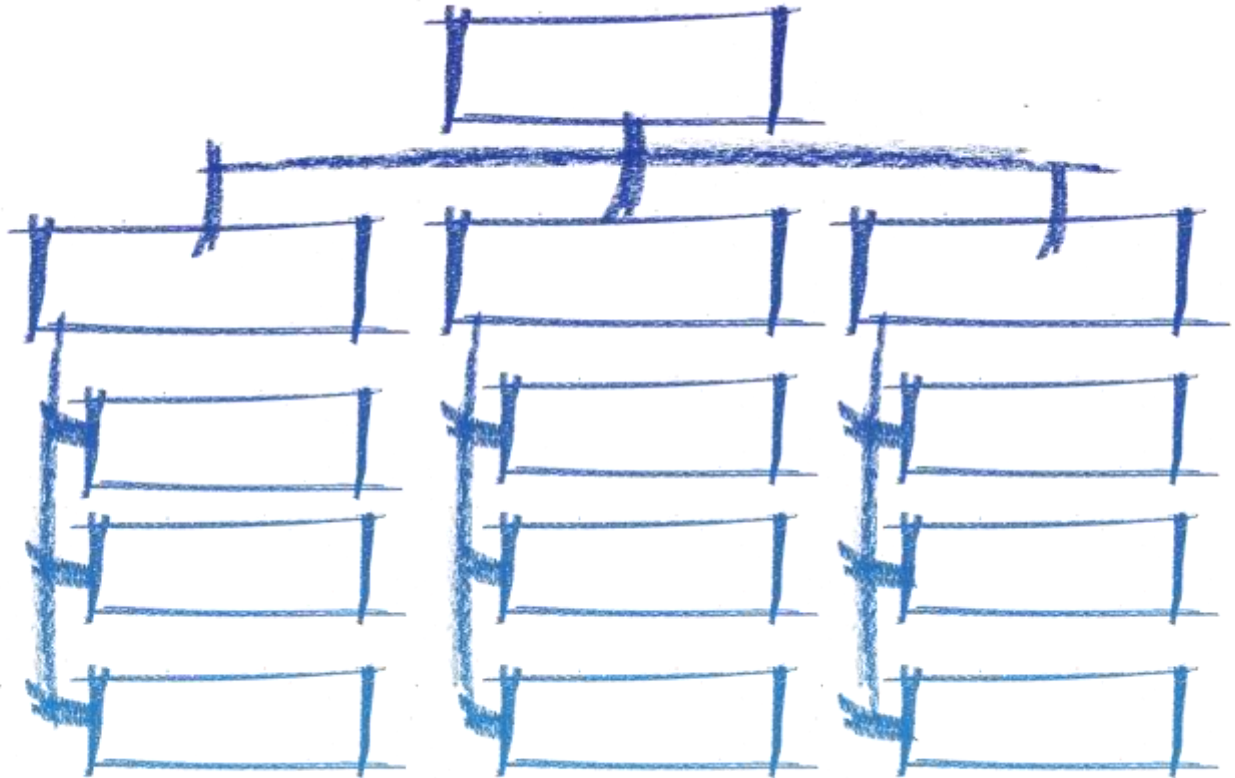
- When identifying an Administrator and Alternate, this item requires names, home addresses, the work phone number, and cell phone number of *each person*.
  - Make sure the primary and alternate contacts **are labeled**.
  - The address for each individual should not match the facility's, unless they live at the facility full-time. If so, please specify.



# How to Fix COMMON MISTAKES 4-6: **Charts**

The first step is understanding the difference between these terms!

- Organizational Chart
- Hierarchy of Authority
- Chain of Command



# So what exactly are each of these charts?

## Organizational Chart

- Shows the **internal structure** of an organization and the way different positions work relative to each other.
- How your employees and management are connected throughout your organization as shown in a graph or picture.
- This is your day-to-day structure.

## Hierarchy of Authority

- A clearly defined **path of accountability** within the company.
- Who are the top three people who have the authority to make financial, policy, etc. decisions for your facility in order of preference?
- Minimum of three people required (excluding very small facilities).

## Chain of Command

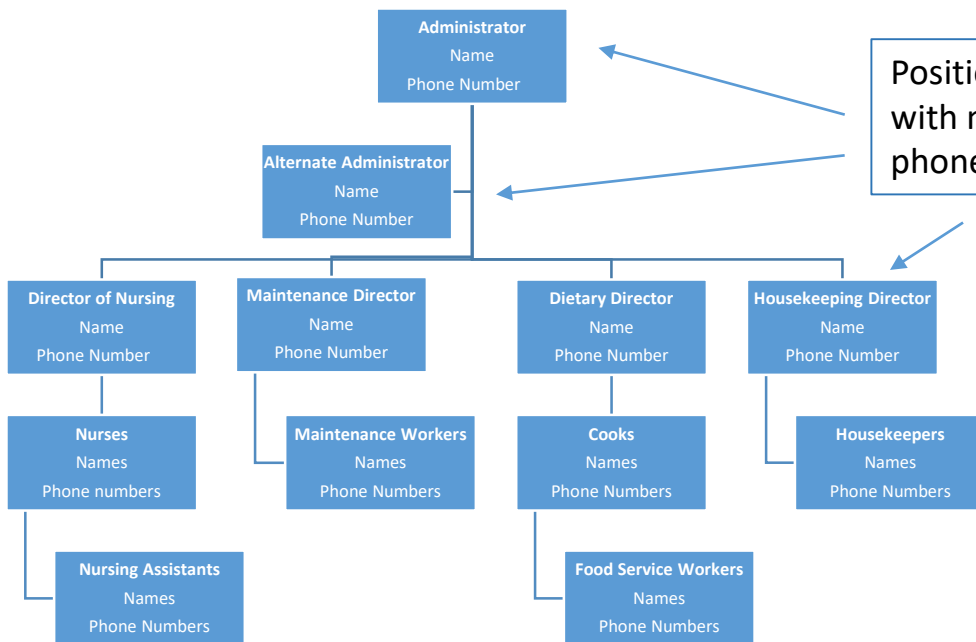
- The **orderly line of authority** within the facility's emergency response leadership.
- This leadership structure is only used during emergencies (but may mirror the day-to-day operation).
- Defines who the top three on-the-ground leaders are during an emergency in a clearly defined order.
- Minimum of three people required (excluding very small facilities).

# How to Fix COMMON MISTAKE 4:

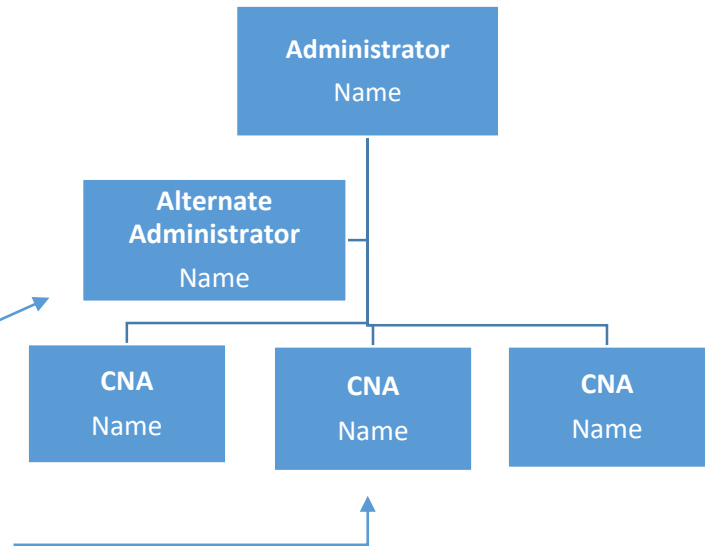
## Section I Item 7

### Organizational Charts

GOOD organizational charts



Positions are identified with names and include phone numbers.



Management and order of supervision is clearly shown through the use of lines connecting each position.

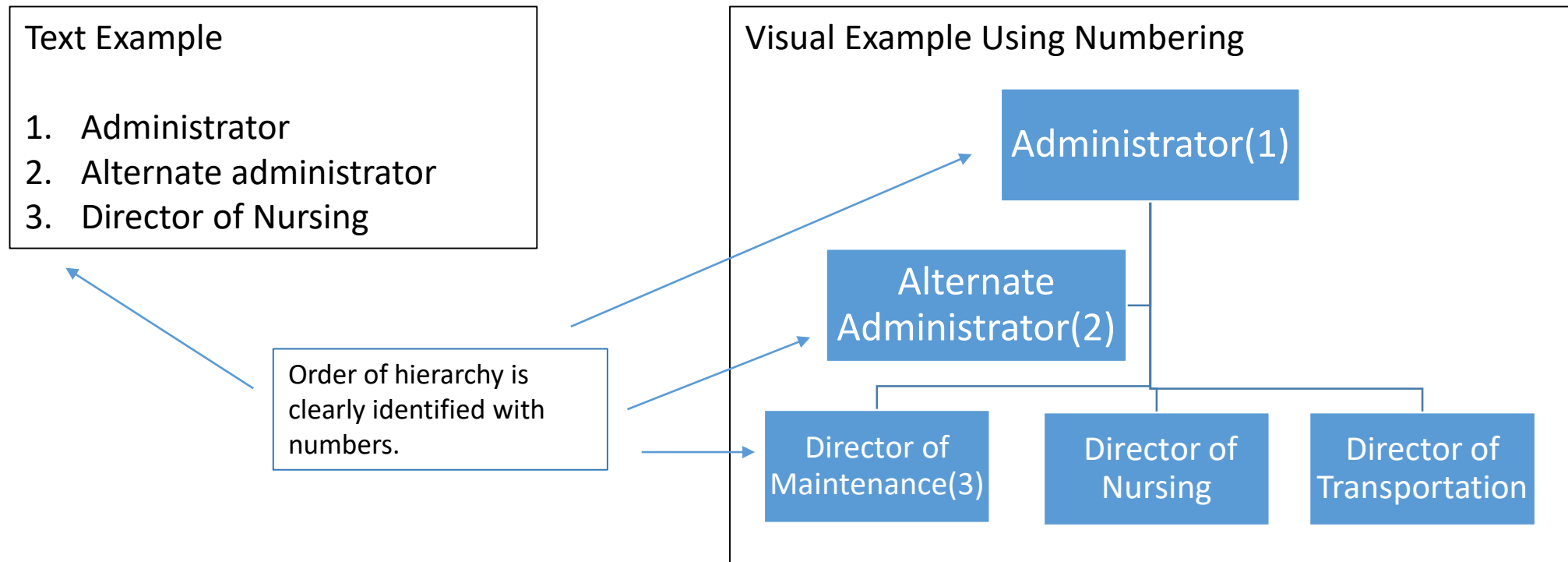
Note: not all facilities are required to include phone numbers in their organizational chart. Please refer to the relevant rule for your facility.

# How to Fix COMMON MISTAKE 5:

## Section III

### Hierarchy of Authority

#### GOOD Examples Hierarchy of Authorities

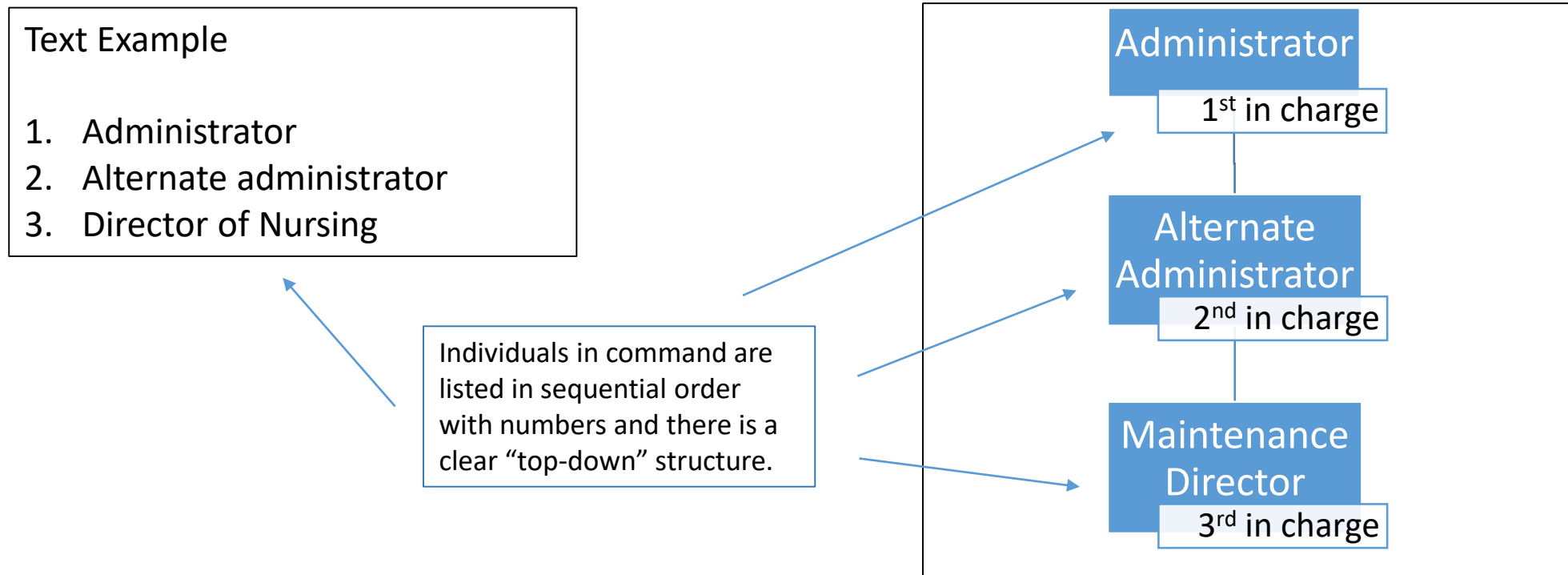


# How to Fix COMMON MISTAKE 6:

## Section 4 Subsection A Item 2

### Chain of Command

#### GOOD Examples of Chain of Command



## **How to Fix COMMON MISTAKES 5 and 6:** **The Difference between “Hierarchy of Authority” and “Chain of Command”**

Hierarchy of Authority and Chain of Command are closely related, but cover two distinct aspects of leadership that may come into play during an emergency.

1. Authority over policy (Hierarchy of Authority)
2. Authority over operations (Chain of Command)



# **How to Fix COMMON MISTAKES 5 and 6:** **Hierarchy of Authority versus Chain of Command**

- Hierarchy of Authority
  - Defines who has the authority to make decisions for the facility.
  - Answers the question: "Who is held accountable to the decisions made by the facility during an emergency?"
- Chain of Command
  - "On-the-ground" structure of leadership.
    - These leaders are instructing staff on what, when, and how during an emergency.
  - Answers the question: "Who is in charge of directing staff and resources when an emergency occurs and while the facility is using their CEMP?"

# **How to Fix COMMON MISTAKES 5 and 6:** **Hierarchy of Authority versus Chain of Command**

- These can be the same individuals/positions in the same order!
  - The key is to keep information accurate and consistent.
- Real-world Examples:
  1. The same person may be on the top of both the Hierarchy of Authority and Chain of Command.
  2. The CEO of the organization has the highest decision making authority (#1 in the hierarchy of authority), but the Facility Administrator is the on-the-ground leader during an emergency (#1 in Chain of Command).
  3. The CEO of the organization is the highest position on the organizational chart, but they designate the authority to make decisions to the Facility Administrator. The Administrator is therefore both the highest in the hierarchy of authority *and* chain of command.

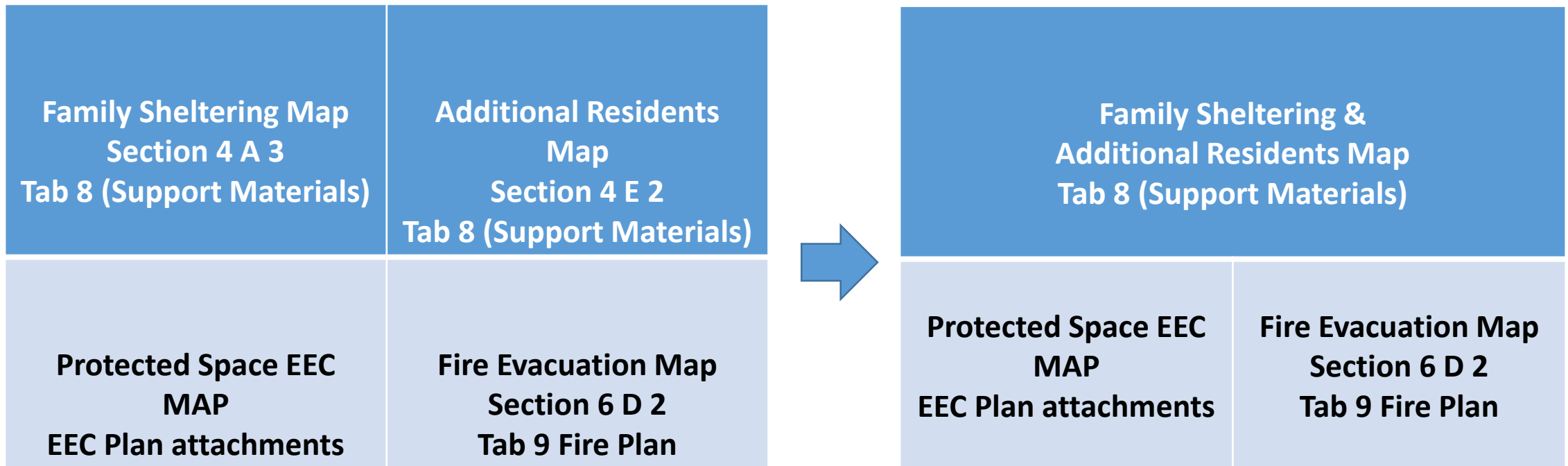
# How to Fix COMMON MISTAKE 7: **Floorplans**

- Clearly title each floor plan for what information it presents.
  - Examples: “Additional Residents Map” or “Rooms with Air Conditioning”
- Clearly identify areas that must be marked on a floorplan with a highlighter or other marker.
  - Reminder, they are: *family sheltering, additional residents, protected space (EECP), and the fire evacuation map.*

<b>Family Sheltering Map</b> Section 4 A 3 Tab 8 (Support Materials)	<b>Additional Residents Map</b> Section 4 E 2 Tab 8 (Support Materials)
<b>Protected Space EEC MAP</b> EEC Plan attachments	<b>Fire Evacuation Map</b> Section 6 D 2 Tab 9 Fire Plan

# How to Fix COMMON MISTAKE 7: **Floorplans**

- Sometimes it makes sense to combine family sheltering maps with additional residents maps due to capacity restrictions.



*This reduces the number of maps needed.*

## **How to Fix COMMON MISTAKE 8:**

### **Section III**

#### **Subsection B Item 5**

*“Proximity of the facility to a railroad or major transportation artery (per hazardous materials incidents).”*

- Provide a name and straight line distance for each major road in all four cardinal directions.
- Use Google Maps or any other mapping program to measure the distance.

# How to Fix COMMON MISTAKE 8:

## Section III

### Subsection B Item 5

What is considered a “major transportation artery?”

- Interstate Highways, U.S. Highways, state highways, county highways, and railroads.
- State and County road examples: Military Trail, Indiantown Road, Northlake Boulevard, 45<sup>th</sup> Street, Lake Worth Road, Hypoluxo Road, W Atlantic Avenue, and Yamato Road.



# How to Fix COMMON MISTAKE 8:

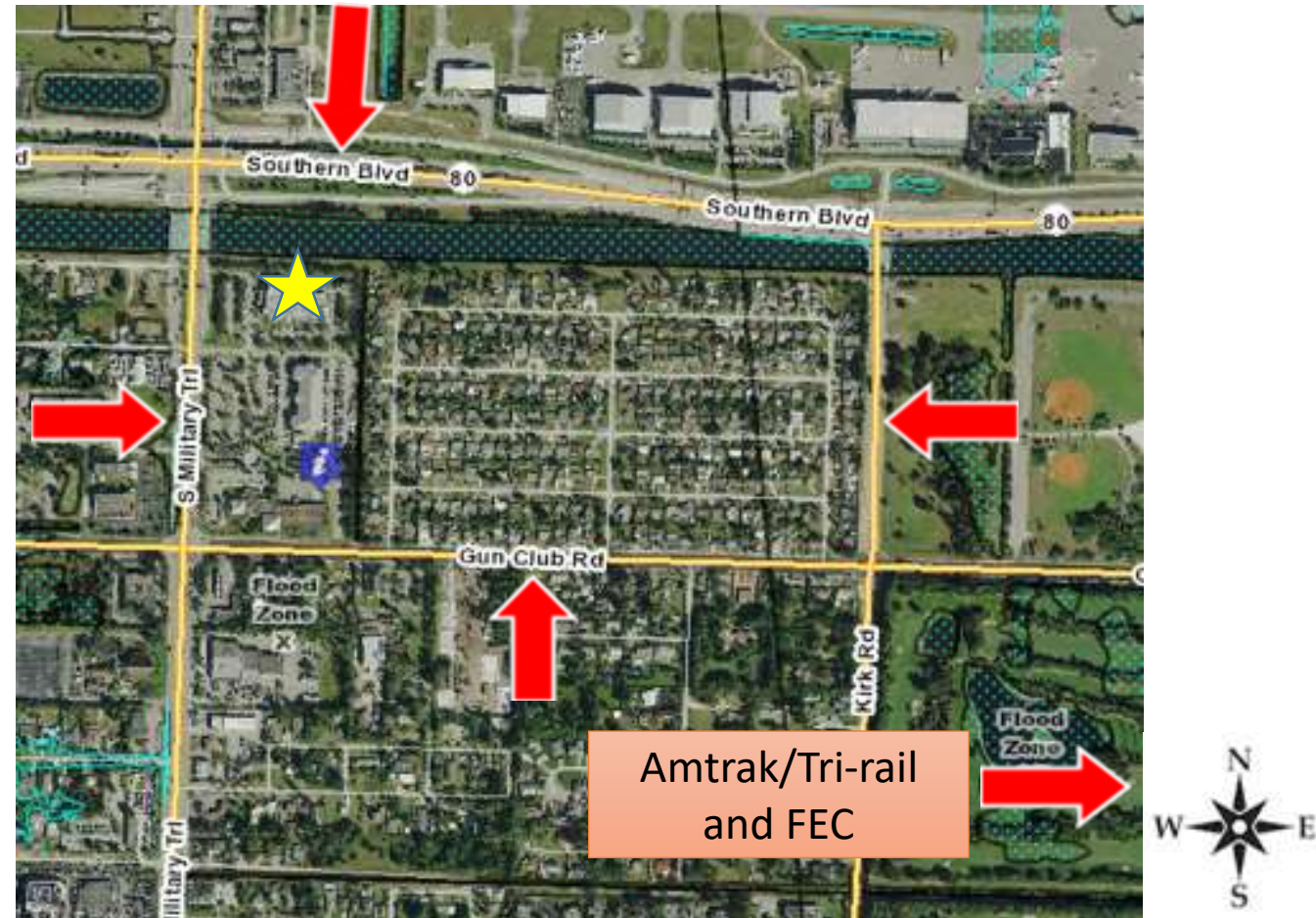
## Section III

### Subsection B Item 5

What do we mean by “Provide a name and straight line distance for a major road in all four cardinal directions”?

Example: the “facility” is located at 20 S. Military Trail, West Palm Beach, FL. The major transportation arteries would be:

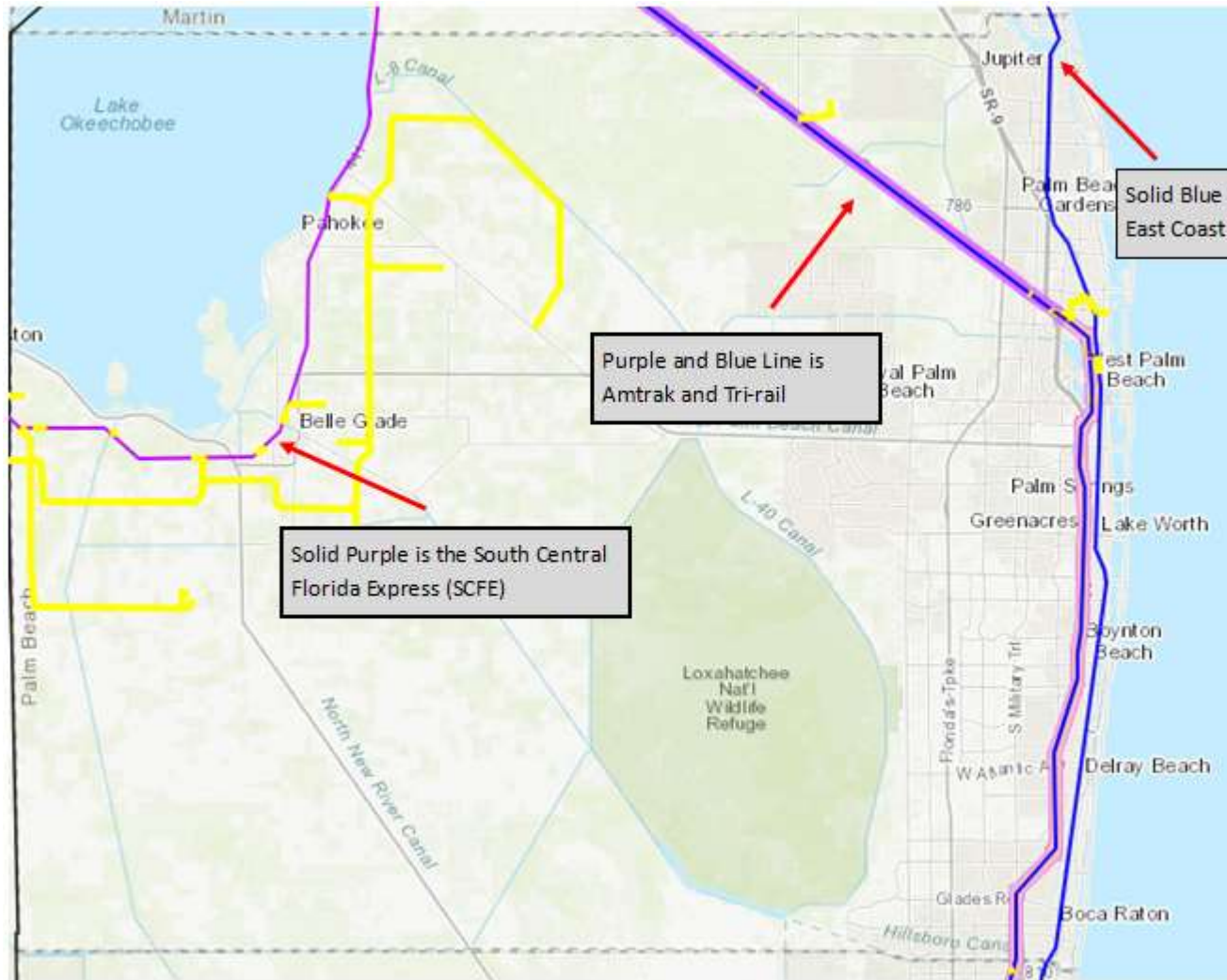
- North: Southern Boulevard, 509 ft
- South: Gun Club Road, 1060 ft
- East: Kirk Road, 0.4 mile
- West: S. Military Trail, 305 ft
- Railroads: Amtrak/Tri-rail, 2.49 miles East; FEC 3.28 miles East



# How to Fix COMMON MISTAKE 8:

## Section III

### Subsection B Item 5



Where are the railroads in Palm Beach County?

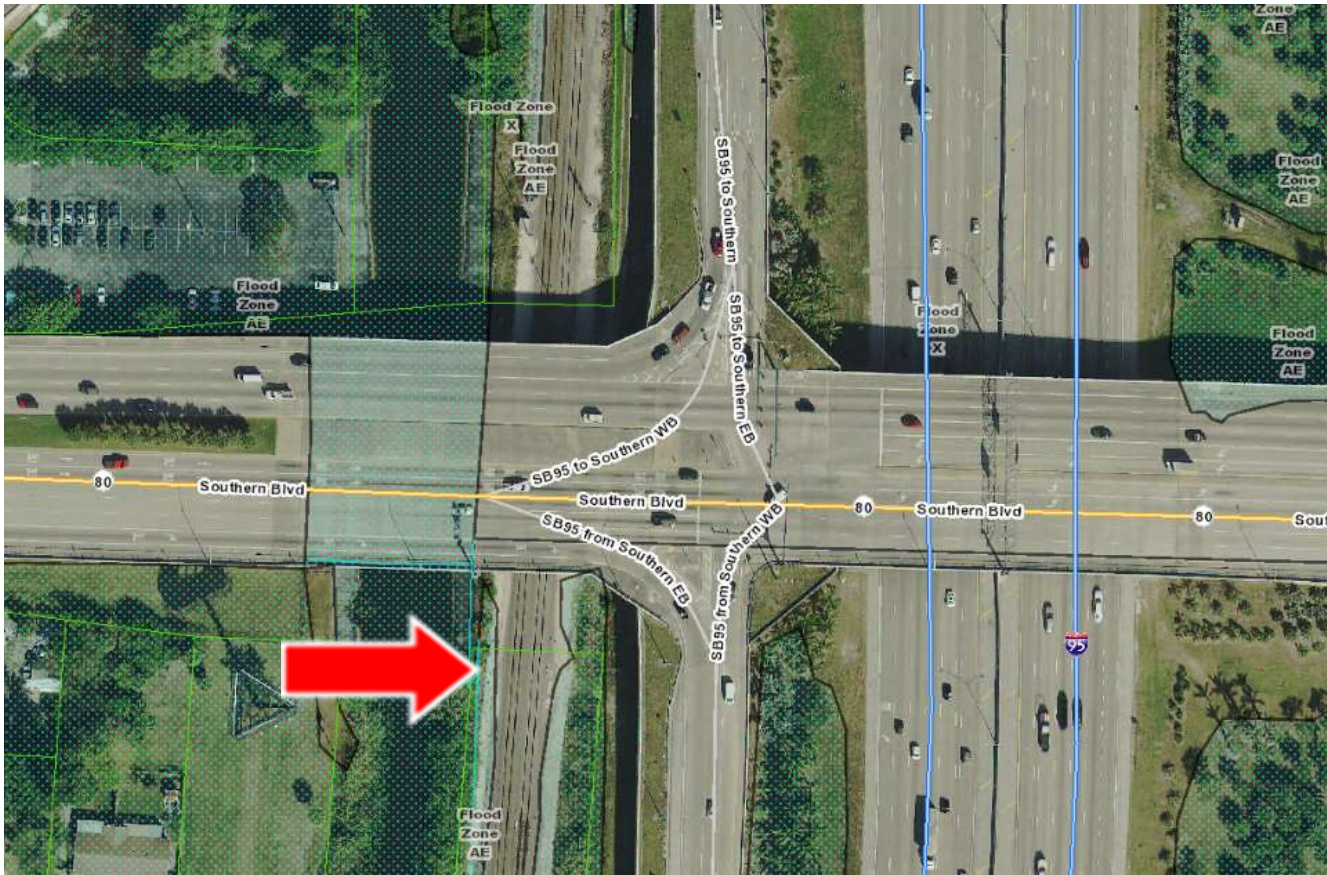
- The Florida East Coast (FEC) line follows US-1 and runs North-South
- Amtrak and Tri-rail shadow I-95 and runs North-South until Riviera Beach, where it turns to run Northwest-Southeast across Florida adjacent to Beeline Highway.
- South Central Florida Express (SCFE) loops around Lake Okeechobee.



# How to Fix COMMON MISTAKE 8:

## Section III

### Subsection B Item 5



Amtrak & Tri-Rail (purple and blue line)

- Shadows I-95 and runs North-South until Riviera Beach, where it turns to run Northwest-Southeast across Florida adjacent to Beeline Highway.



# How to Fix COMMON MISTAKE 8:

## Section III

### Subsection B Item 5



- Florida East Coast Railway (FEC)  
(solid blue line)
- Follows US-1 and runs North-South



# **How to Fix COMMON MISTAKE 9:**

## **Section V**

### **Information, Training and Exercises**

- Trainings
  - These are sessions or meetings where the facility's staff is learning and receiving information from a provider about the facility's emergency response, generally in a classroom setting or through interactive media.
  - Examples: In-services, staff trainings, or meetings.
  - Avoid using the terms "drills" or "exercises" for this item.
- Drills and Exercises
  - These are scenarios and situations where the facility's staff will practice and apply what they learned during training sessions.
  - Describe how your facility's staff physically practices for the emergencies described in the hazard analysis section.
  - Examples: Hazard-specific drills and exercises (e.g. fire drills, elopement drills, evacuation exercises), table-top exercises, walkthroughs, workshops, etc.

**Remember: Drills are an exercise, not a training.**

# How to Fix COMMON MISTAKE 9:

## Section V

### Information, Training and Exercises

- Schedules
  - Suggestion: set it and leave it – schedule a training or exercise for each month or quarter!
  - Training and exercise schedules may be combined.
  - Schedules should provide dates, or months, or at a minimum a pattern of regular occurrence (i.e. monthly, quarterly, annually).
- Corrections of deficiencies.
  - Define how the exercise results will cause changes and updates to the overall CEMP if any flaws are detected during the exercise.
  - Define how staff will be educated on any mistakes or misunderstandings.
  - **This is about correcting the plan, not staff performance.**

# Still have a Question?

Feel free to contact Palm Beach County Division of Emergency Management. We are not only the plan reviewer, but also your local partner and guide through the plan review process.



For plan status and scheduling meetings  
contact : 561-712-6362  
For submitting your plan  
contact: 561-712-6400  
[www.ReadyPBC.com/hcemp](http://www.ReadyPBC.com/hcemp)

