



## Health Care Regulation Guidance Letter

<b>Number:</b> GL 20-0003-A
<b>Title:</b> Preparing for Hurricane Season During the COVID-19 Disaster [Amended]
<b>Provider Types:</b> Abortion Facilities, Ambulatory Surgical Centers, Birthing Centers, Chemical Dependency Treatment Facilities, Community Mental Health Centers, Comprehensive Out-Patient Rehabilitation Facilities, Crisis Stabilization Units, End Stage Renal Disease Facilities, Freestanding Emergency Medical Care facilities, Hospitals – General, Hospitals – Psychiatric & Crisis Stabilization Units, Hospitals – Special, Laboratories – Clinical Laboratory Improvement Amendments (CLIA), Licensed Chemical Dependency Counselors, Narcotic Treatment Programs, Portable X-Ray Services, Rural Health Clinics, and Special Care Facilities
<b>Date Issued:</b> September 2, 2020

### 1.0 Subject and Purpose

This letter provides guidance to regulated health care facilities and licensed professionals on how to prepare for the 2020 hurricane season during the COVID-19 public health emergency.

The Atlantic hurricane season began on June 1, 2020 and will last until November 30, 2020. The National Oceanic and Atmospheric Administration (NOAA), a division of the National Weather Service, has predicted an above-normal hurricane season this year, which presents unique challenges during the continued COVID-19 disaster.<sup>1</sup> The National Hurricane Center (NHC) already recorded several potentially dangerous storms this year: Tropical Storm Arthur, on May 19, 2020;<sup>2</sup> Tropical Depression Bertha, on May 27, 2020;<sup>3</sup> and Tropical Storm Cristobal, on June 7-8, 2020.<sup>4</sup>

<sup>1</sup> [Busy Atlantic hurricane season predicted for 2020, NOAA.](#)

<sup>2</sup> [Post-Tropical Cyclone Arthur, NHC & CPHC.](#)

<sup>3</sup> [Tropical Depression Bertha, NHC & CPHC.](#)

<sup>4</sup> [Tropical Storm Cristobal, NHC & CPHC.](#)

This letter outlines a variety of resources from both state and federal agencies for providers to utilize during the 2020 hurricane season to protect themselves, their staff, and their patients and clients from dangerous weather conditions while preventing and slowing the spread of COVID-19.

## 2.0 Policy Details & Provider Responsibilities

Due to the COVID-19 pandemic, Texas and the United States of America will face unprecedented challenges in preparing for and responding to additional disasters, including the 2020 hurricane season.

### 2.1 General Information

Hurricane researchers have predicted a very active hurricane season<sup>5</sup> for 2020, forecasting 19 named storms, including 9 hurricanes, 4 major hurricanes, and 85 storm days during the season.<sup>6</sup> Coastal areas are especially vulnerable to hurricane and tropical storm activity, but direct storm impact is not required for providers and facilities to be affected. Slow moving or stalled storms can cause some of the worst damage.

As hurricane season continues, listen closely to communications from local officials and be ready to act quickly. According to the National Weather Service (NWS), a hurricane, tropical storm, or storm surge **watch** means dangerous conditions are possible in your area. The NHC typically issues hurricane watches 48 hours before it anticipates tropical storm-force winds.

A hurricane, tropical storm, or storm surge **warning** means dangerous conditions are expected in your area; the NHC issues a hurricane warning 36- hours in advance of tropical storm-force winds. A warning is more serious – complete your emergency and disaster preparedness plan quickly and evacuate immediately, if so ordered.<sup>7</sup>

### 2.2 Specific Risks for Providers

Health care providers face unique risks and challenges during the hurricane season, including power loss, limited radio communications, fuel storage for generators, and loss of medical refrigeration, thermostability, security systems, and lighting.

Responding to disasters during the COVID-19 pandemic may be even more emotionally taxing than usual and caring for your emotional health can help

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<sup>5</sup> [Increasing forecast slightly, CSU researchers predict very active 2020 Atlantic hurricane season, Phil Klotzbach, Colorado State University.](#)

<sup>6</sup> [Forecast for 2020 Hurricane Activity, CSU Seasonal Hurricane Forecasting.](#)

<sup>7</sup> [Hurricane and Tropical Storm Watches, Warnings, Advisories and Outlooks, NWS.](#)

you respond to stressful situations more effectively. Take advantage of mental health resources such as SAMHSA's Disaster Distress Helpline<sup>8</sup> and make sure to share these resources with both patients and staff, as responders can experience secondary traumatic stress following disasters.

Make sure to give your facility and your staff more time and resources than usual to prepare for disasters and review your emergency and disaster preparedness plan often. Shortages, travel restrictions, and stay at home orders may impact your ability to gather emergency supplies, so stockpile necessary items such as food, water, and medical supplies early.<sup>9</sup> Plan to meet the needs of current patients and a possible influx of patients from similar programs and facilities. You may need to increase security and screening personnel for ride-out teams to ensure all access points are properly monitored and patients and staff are screened before entering the facility.

It is vital to continue taking preventative actions<sup>10</sup> to slow the spread of COVID-19 such as maintaining social distancing, covering coughs and sneezes, washing your hands often, and wearing a face covering, even during a hurricane or a mandatory evacuation. Flood waters may prevent delivery of essential supplies, so you should also ensure you have adequate PPE on hand (in house), including essential COVID-19 prevention supplies, such as additional PPE and hand sanitizer in the facility's emergency disaster supply kit.

Due to the hurricane season, it may be necessary to seek shelter, either at home, in a medical facility, or in a public shelter. Crowded conditions in public shelters are a cause for concern due to the ongoing COVID-19 pandemic. If it is necessary to go to a shelter, follow the [CDC's recommendations](#). Otherwise, the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) has provided [recommendations on non-congregate sheltering](#).

If portable generators are used either at a facility or at home, it is important to follow all manufacturer safety guidelines. Never run portable generators indoors, even if doors and windows are open, as this can cause an accumulation of carbon monoxide. Facilities should always ensure carbon monoxide detectors are functioning and tested regularly. View the [CDC's Carbon Monoxide – Generator Safety Fact Sheet](#) for details. This fact sheet can also be posted at your facility and shared with patients and staff.

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<sup>8</sup> [SAMHSA Disaster Distress Helpline](#).

<sup>9</sup> [Preparing for Hurricanes During the COVID-19 Pandemic, CDC](#).

<sup>10</sup> [Prevent Getting Sick, CDC](#).

## 2.4 Notifying HHSC of an Emergency/Disaster

When any licensed health care facility experiences an emergency and/or disaster resulting in an emergency closure and/or changes in daily operations and services provided, a facility must complete and submit [Form 3215, Emergency/Disaster Notification](#). Please ensure the safety of patients/clients and then complete [Form 3215](#) to notify HHSC of any resulting changes in the facility's operation as soon as possible.

In June of 2020, HHSC published a [web-based version of Form 3215, Emergency/Disaster Notification](#), which is accessible on all smart-phone mobile devices.

## 2.5 Reopening a Facility After an Emergency/Disaster

Following a facility closure due to an emergency and/or disaster, a facility must notify HHSC when they plan to re-open, including full and partial re-openings. Upon re-opening, providers must immediately email HHSC at [healthfacilitylicensing@hhsc.state.tx.us](mailto:healthfacilitylicensing@hhsc.state.tx.us) and provide their facility name, license number, address, and date of re-opening.

## 2.6 Requesting an Emergency Rule Exception

Providers may request an emergency rule exemption when facing an emergency or disaster. End Stage Renal Disease (ESRD) facilities requesting an emergency exemption to the ESRD licensing requirements must complete and submit [Form 1011](#). **Please note, [Form 3215](#) is not a substitute for [Form 1011](#).**

In June of 2020, HHSC published a [web-based version of Form 1011, ESRD Facility Emergency Rule Exemption Request](#), which is accessible on all smart-phone mobile devices.

## 3.0 Background/History

On March 13, 2020, Governor Greg Abbott issued a proclamation declaring a state of disaster for all counties in Texas. The COVID-19 disaster has affected all aspects of provider operations, including emergency and disaster preparedness. As we enter the 2020 Atlantic hurricane season, HHSC provides guidance to health care providers on how to balance COVID-19 concerns with responsible hurricane preparedness planning.

## 4.0 Resources

CDC-promoted hurricane resources are provided below:

- <https://www.cdc.gov/disasters/hurricanes/>
- <https://www.cdc.gov/disasters/hurricanes/covid-19/prepare-for-hurricane.html>
- <https://www.nhc.noaa.gov/prepare/ready.php>
- <https://www.ready.gov/hurricanes>
- <http://www.redcross.org/get-help/how-to-prepare-for-emergencies/types-of-emergencies/hurricane>
- [https://www.cdc.gov/cpr/readiness/hurricane\\_messages.htm](https://www.cdc.gov/cpr/readiness/hurricane_messages.htm)

The Centers for Medicare and Medicaid Services (CMS) emergency-related resources are provided below:

- <https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/EPRO-Home>
- <https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page>
- <https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Past-Emergencies/Hurricanes-and-tropical-storms>

Department of State Health Services (DSHS) resources are provided below:

- <https://texasready.gov/>
- <https://texasready.gov/be-informed/>
- <https://texasready.gov/make-a-plan/>
- <https://texasready.gov/build-a-kit/>
- <https://texasready.gov/video-series/>
- <https://texasready.gov/resources/>

FEMA emergency-related resources are provided below:

- <https://www.fema.gov/disaster/4339/hurricane-preparedness>

- <https://www.fema.gov/news-release/2018/08/16/proper-emergency-kit-essential-hurricane-preparedness>
- <https://www.fema.gov/coronavirus/>
- <https://www.fema.gov/media-library/assets/documents/188203>
- <https://www.fema.gov/media-library/assets/documents/188454>

HHSC's emergency-related resources are provided below:

- HHSC's Emergency Preparedness and Response webpage, provided at <https://hhs.texas.gov/doing-business-hhs/provider-portals/health-care-facilities-regulation/emergency-preparedness-response>
- Health Facility Licensing Emergency/Disaster Notification form 3215, provided at <https://texashhs.secure.force.com/EMR3215/>
- End Stage Renal Disease (ESRD) Facility Emergency Rule Exception Request form 1011, provided at <https://texashhs.secure.force.com/EMR1011/>

Mental health support and trauma resources can be found below:

- <https://emergency.cdc.gov/coping/index.asp>
- <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/managing-stress-anxiety.html>
- <https://www.samhsa.gov/find-help/disaster-distress-helpline>

National Oceanic and Atmospheric Administration (NOAA) Watches, Warnings or Advisories for Texas, provided at <https://alerts.weather.gov/cap/tx.php?x=1>.

Substance Abuse and Mental Health Services Administration (SAMHSA) Resources specific to Chemical Dependency Treatment Facilities and Narcotic Treatment Facilities are provided below:

- <https://www.samhsa.gov/coronavirus>
- <https://www.samhsa.gov/types-disasters/hurricanes-tropical-storms>
- <https://www.samhsa.gov/dbhis-collections/disaster-specific-resources?term=Hurricane-DBHIS>

Texas Department of Transportation Hurricane Information and Evacuation Routes, provided at <https://www.txdot.gov/driver/weather/hurricane.html>.

**5.0 Contact Information**

If you have any questions about this letter, please contact the Policy, Rules, and Training Section by email at: [HCR\\_PRT@hsc.state.tx.us](mailto:HCR_PRT@hsc.state.tx.us)