



ARKANSAS DEPARTMENT OF HEALTH

FREQUENTLY ASKED QUESTIONS (FAQ) **AFFECTING MULTIPLE SECTIONS**

If a trauma center opens an off-campus Emergency Department (ED), how will the Trauma Section treat this facility?

Relevant sections of the *Rules and Regulations for Trauma Systems*:

(Adopted 6/2/14)

SECTION V. TRIAGE REQUIREMENTS FOR TRAUMA FACILITIES

B. 2., page 18 (Assignment of Trauma Score and Activation of the Trauma Protocol)

C., page 19 (Triage Standards for Level I and II Facilities)

D., 2., page 20 (Assignment of Trauma Score and Activation of the Trauma Protocol)

E., page 21 (Triage Standards for Level III and IV Facilities)

I., page 24 (Standards for Transfers Between Trauma Facilities)

SECTION VI. STANDARDS FOR TRAUMA FACILITY DESIGNATION

B., 2., page 26 (Site Survey)

SECTION VII. TRAUMA FACILITY RESOURCE STANDARDS

A., 2., page 31 (Emergency Department)

B., 1., page 33-35 (Emergency Department)

As noted above, this question touches on several sections of the Rules. The answers below have been fully coordinated with the Arkansas Department of Health's (ADH) Health Systems Licensing and Regulation Branch. Please note that the current Arkansas rules regarding hospital licensure do not address off-campus EDs. However, the Health Systems Licensing and Regulation Branch will use guidance on this issue gleaned from Centers for Medicare and

Medicaid Services (CMS) guidelines. These guidelines state that such a facility's operations must be fully integrated with the policies of the hospital of which it is a part. In essence, the policies of the off-campus ED must mirror those of the on-campus ED. For ease of reading, the answers to the above question have been set forth in "bullet" format below.

- The off-campus ED will operate under the same facility license as the main hospital that houses the on-campus ED.
- The Health Systems Licensing and Regulation Branch will ensure that all state conditions for operation are met.
- The off-campus ED must also meet applicable CMS requirements.
- Once operational, the off-campus ED will be a department of the main hospital that houses the on-campus ED and not a separate facility (both the ADH's Health Systems Licensing and Regulation Branch and the Trauma Section will treat it as such).
- In order for the main hospital that houses the on-campus ED to retain its current trauma center designation, both the off-campus and on-campus EDs must meet the standards set forth for EDs in the most recent version of the trauma rules and regulations. In addition, since as noted above the policies of the off and on-campus EDs must be the same, they must both meet the trauma rules regarding trauma team response for the highest level of activation. In the case of a patient who presents at the off-campus ED and requires the highest level of activation, the trauma team will be activated at the on-campus site and the "clock will begin ticking." The trauma team must arrive at the on-campus site within 30 minutes of activation. At the same time the trauma team is being activated, the patient will be expected to be stabilized and transferred, to arrive at the on-campus ED within the same 30 minute timeframe. The 30 minute rule must be met 80% of the time for the highest level activations aggregated for both sites.
- Verification of compliance with these standards at both sites will occur at the time of the main hospital's site survey (every four years under the current rules but every three years under the proposed rules).
- The off-campus ED will be listed on the Arkansas Trauma Communications Center's (ATCC's) dashboard to represent its real time capability and capacity, which at most would be an ED and a CT scanner.
- The ATCC will not recommend that EMS take major or moderate trauma patients to the off-campus ED.

- The ATCC will not recommend transfers of patients from other facilities to the off-campus ED.
- EMS providers are already discouraged from contacting the ATCC regarding the destination of minor trauma patients. The destination is at the discretion of the treating EMT or Paramedic. Therefore, the off-campus ED may receive minor trauma patients by EMS or who self-present. In addition, it may receive major or moderate patients who either self-present or who are transported by EMS due to the following urgent circumstances which require immediate assistance: 1. inability of EMS to maintain an adequate airway, or 2. inability of EMS to control excessive hemorrhage.
- The off-campus ED will be required to notify the ATCC only regarding a transfer to another facility should the main hospital not have the capability or capacity to treat the patient.