Understanding and Implementing an Effective Infection Prevention Program

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Objectives

- List the components of an infection prevention program.
- Review the challenges to infection prevention in congregate care settings.
- Discuss the role of leadership in infection prevention.
- Describe the types of transmission-based precautions and when to institute them.
- Identify the specific resident activities identified as having an increased risk for MDRO transmission





"PREVENT INFECTIONS.... NOT JUST CONTROL THEM!"



Principal Goals

- Protect the resident
- Protect others in the facility
- Cost-effective





Infection Prevention in Congregate Care

- Unique challenges:
 - Regulations
 - Expectations
 - Environment
- Requires creative problem-solving





Regulations and "A day in the life..."

- Very stringent
- Activities requirements
- Least restrictive environment:
 - "It is their home!"





Residents and Families

- Acuity
- Mentation challenges
- Physiologic challenges
- Family challenges





Environment

- Facility issues:
 - Storage
 - Construction
 - Limited private rooms
- Resident "stuff"
- EVS staff training





Clinical Staff

- Frequent turnover
- Education
- Workload





Regulatory Requirements





Personal Care

- 55 Pa. Code Chapter 2600
- 2600.65(d) training of direct care staff
- Includes:
 - (xiii) Universal precautions.
 - (xv) Infection control.
 - (xvi) Care for individuals with mobility needs, such as prevention of decubitus ulcers (bed sores), incontinence, malnutrition and dehydration

https://www.dhs.pa.gov/providers/Clearances-and-Licensing/Documents/PCH%20Residential%20Licensing/Personal%20Care %20Home%20Regulatory%20Compliance%20Guide.pdf



Assisted Living

- 55 Pa. Code Chapter 2800
- 2800.65(g) training of direct care staff
- Includes:
 - (xiii) Universal precautions.
 - (xv) The signs and symptoms of infections and infection control
 - (xvi) Care for individuals with mobility needs, such as prevention of decubitus ulcers (bed sores), incontinence, malnutrition and dehydration

https://www.dhs.pa.gov/providers/Documents/Human_Services_Licensing/AssistedLivingResidenceLicensing/p_023324.pdf



CMS Long-Term Care Final Rule



68688

Federal Register / Vol. 81

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Centers for Medicare & Medicaid Services

42 CFR Parts 405, 431, 447, 482, 483, 485, 488, and 489

[CMS-3260-F]

RIN 0938-AR61

Medicare and Medicaid Programs; Reform of Requirements for Long-Term Care Facilities

AGENCY: Centers for Medicare & Medicaid Services (CMS), HHS.

ACTION: Final rule.

SUMMARY: This final rule will revise the requirements that Long-Term Care facilities must meet to participate in the Medicare and Medicaid programs.

- 42 CFR part § 483.80 Infection Control
- Infection Prevention & Control Program (IPCP) includes:
 - Written Infection Prevention Program encompassing risk assessment, policies, auditing with follow-up
 - Influenza and pneumococcal vaccines
 - Safe handling of linen
 - Antibiotic stewardship program
 - Antibiotic use protocols
 - System to monitor antibiotic use
 - Infection Preventionist in place
 - Coordination of QAPI plan with incorporation of Infection Prevention





CMS COVID-19 Changes

- Interim Final Rules:
 - COVID-19 reporting requirements
 - Will continue to report data via NHSN
 - Vaccination status through May 2024
 - COVID-19 testing requirements:
 - Rule states is applicable for the duration of PHE but be aware facilities are subject to the accepted standards from the CDC and are required by CMS to follow accepted standards for infection prevention and control

DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicard Services 1500 Security Bendrum Mad Sop C2-21-10 Baltimur, Mayland 21244 E00



Center for Clinical Standards and Quality/Quality, Safety & Oversight Gro

Ref: QSO-23-13-ALL

DATE: May 01, 2023

TO: State Survey Agency Directors

FROM: Directors, Quality, Safety & Oversight Group (QSOG) and Survey &

Operations Group (SOG)

SUBJECT: Guidance for the Expiration of the COVID-19 Public Health Emergency

(PHE)

Memorandum Summary

- Social Security Act Section 1135 emergency waivers for health care providers will terminate with the end of the COVID-19 Public Health Emergency (PHE) on May 11, 2023.
- Certain regulations or other policies included in Interim Final Rules with Comments (IFCs) will be modified with the ending the PHE. Certain policies, such as the Acute Hospital at Home initiative and telehealth flexibilities have been extended by Congress through December 31, 2024.
- Long Term Care and Acute and Continuing Care providers are expected to be in compliance with the requirements according to the timeframes listed below.

Background

The Secretary's authority in Section 1135 of the Social Security Act (the "Act"), allowed CMS to issue several temporary energency statutory and regulatory waivers and flexibilities to help providers respond to the COVID-19 Public Health Emergency (PHE) and focus on the needs of beneficiaries while working to prevent the speeds of COVID-19. Since the Secretary has announced the PHE will end on May 11, 2023, the authority to issue and maintain 1135 waivers ends on that date. This memorandum outlines the expiration of the emergency waivers issued during the PHE related to the minimum health and safety requirements for Long Term Care (LTC) and Acute and Continuing Care (ACC) providers. This memorandum also describes the timelines for certain regulatory requirements issued during the PHE through Interim Final Rules with Comments (IFCs). The guidance for the termination of emergency waivers and timelines for requirements issued through IFCs are grouped by provider type, starting with guidance that affects all provider-types.

For all LTC and ACC providers/suppliers: Pages 2-3. For LTC facilities (i.e., nursing homes): Pages 3-6.

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CMS Changes

- Interim Final Rules:
 - Staff Vaccination Mandate
 - CMS announced May 1st the intent to end this requirement
 - Vaccine education and vaccine offering:
 - Continues through May 2024 unless otherwise specified by CMS

DEPARTMENT OF HEALTH & HUMAN SERVICES Content for Medicate & Medicard Services 1908 Society Brainward, Mail Stop C2-21-10 Baltanon, Maryland 21244-1450



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Regulatory Waivers

- Telehealth Services extended through December 31, 2024
- Nurse Aide Training aides have 4 months from end of PHE to complete training and certification requirements
- Qualifying Hospital Stay terminated with end of PHE
- Benefit Period terminated with end of PHE
- Pre-Admission Screening and Resident Review terminated with end of PHE
- Resident Roommates and Grouping terminated with end of PHE but continue to practice effective mitigation strategies for COVID-19
- Resident Transfer and Discharge terminated with end of PHE but continue to practice effective mitigation strategies for COVID-19



Additional Regulations

- Legionella Program 42 CFR §483.80 Revised July 6, 2018
- OSHA Bloodborne Pathogen Standard 29 CFR §1910.1030
- Prevention, Control, and Surveillance of Tuberculosis PA Code §201.22.
- Act 52 reporting of healthcare acquired infections into PA-PSRS





Act 52 of 2007 PA Nursing Home Reporting

- Requires the Patient Safety Authority and Department of Health to develop a list of reportable HAIs in nursing homes using nationally recognized standards.
- Requires electronic reporting of specific HAIs to the Patient Safety Authority and Department within 24 hours of confirmation.
- Requires LTCFs to notify the resident or legal representative in writing within seven days of confirmation of the HAI



Infection Prevention Program Development





Program Elements

- Infection Prevention Team
- Building blocks
- Infection Preventionist





Infection Prevention Committee





Leadership's Role in Infection Prevention

- Provide sufficient resources
- Culture of clinical excellent
- Effective communication
- Overcome barriers impeding infection prevention
- Inspire employees
- Strategic thinkers
- Move initiatives forward
- Assist in forming partnerships across disciplines



Building Blocks Components of an Infection Prevention Program

Components:

- Risk assessment
- IP plan
- Goal setting
- Action planning
- Policy/procedure development
- Monitoring





Suggested Content of an Infection Prevention Plan

- Background information
- Action Plan
- Supportive documents
- Other activities





Plan Evaluation and Assessment

- Entities will assess IC Plan:
 - QAPI committee
 - Senior Leadership
 - DOH surveyor

PA DOH IC Plan Tool Kit - Facility Self-Assessment Tool Infection Control Plan Standard Criteria Review Form				
Facility Name:				
Submitted By:				
☐ Initial Submission Resubmission #: ☐ 1 ☐ 2 ☐ 3 ☐ 4				
IP Contact:	#:	Email:		
License/Facility ID #:	PSA training name/date:	Hospital Ty	pe:	
NHSN# (Hospital only):	NHSN training name/date:	LTC - NH	only	
Instructions: This Facility Self-Assessment Tool must be completed and submitted to the Department along with your Infection Control (IC) Plan, facility-specific infection control risk assessment document and the selected policies below:				
☐Hand Hygiene	Outbreak Containment		Disinfection	
☐Standard Precautions ☐Healthcare-associated Infection Reporting ☐Sterilization				
☐Transmission-Based Precautions ☐Infection Control Breach Reporting				
□Infection Surveillance	□Cleaning			
The initial IC plan approval decision will be made based on these required documents. Additional policy and procedure documents may be requested for additional clarification and/or content verification.				
Chapter 4, Section 403 of the Medical Care Availability and Reduction of Error Act (MCARE), 40 P.S. § 1303.403.				
https://www.legis.state.pa.us/cfdocs/legis/li/uconsCheck.cfm?yr=2007&sessInd=0&act=52				
Element # / Evidence Meeting Intent of the Law			Requirement Met	
1. Multi-Disciplinary Committee: include	ling representatives from each of the followin	g, if applicable	1. Committee	



Infection Preventionist

- Educational requirements:
 - Certificate course
- Duties:
 - Surveillance
 - Education
 - Rounding
 - Auditing/Monitoring
 - Reporting internally and externally





Educational Requirements

Certificate course

Sources that offer basic infection prevention courses include, but are not limited to:

- Association of Professionals in Infection Control and Epidemiology (APIC) offers online training: https://apic.org/education-and-events/ltc-certificate/
- Centers for Disease Control and Prevention (CDC) and the Centers for Medicare and Medicaid Services (CMS) offer online training: https://www.cdc.gov/longtermcare/training.html



Auditing

- Auditing is a key component of a strong infection prevention program
- Monitor staff for compliance
 - Hand hygiene
 - PPE use
 - Precautions
- "You don't know, what you don't know!"



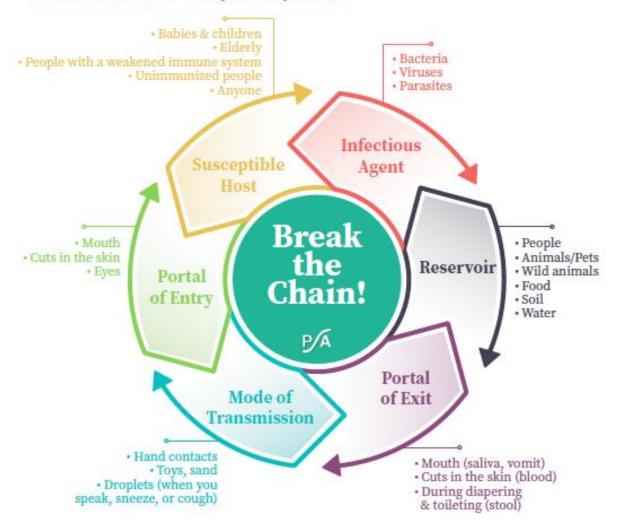
Remember the Basics

- Hand hygiene
- Cough and sneeze etiquette
- Spatial separation
- "Cuddle carefully"
- All residents are in standard precautions at all times



Precautions

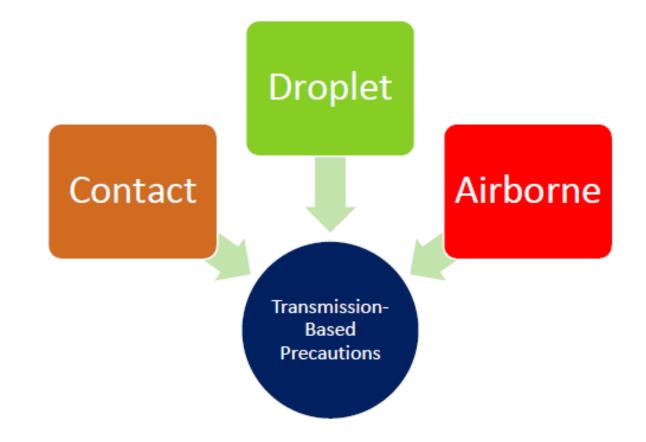
Break the Chain—Stop the Spread!





Types of Precautions

- Standard
- Transmission- based:
 - Contact
 - Droplet
 - Airborne
- Enhanced Barrier





Standard Precautions

- The minimum infection prevention measures that apply to all resident care, regardless of suspected or confirmed infection status of the resident
- Evidence-based practices designed to protect healthcare personnel and prevent the spread of infections among residents
- Implementation of Standard Precautions constitutes the primary strategy for the prevention of healthcare-associated transmission of infectious agents among residents and healthcare personnel



Standard Precautions Include:

- Hand hygiene
- Use of personal protective equipment (PPE)
- Safe handling of potentially contaminated equipment or surfaces in the patient environment
- Respiratory hygiene/cough etiquette
- Safe injection practices



Resident Characteristics

Component	Recommendation	
Personal Protective Equipment (PPE)		
Gloves	For touching blood, body fluids, secretions, excretions, contaminated items; for touching mucous membranes and non-intact skin	
Gown	During procedures and patient-care activities when contact of clothing/exposed skin with blood/body fluids, secretions, and excretions is anticipated	
Mask, eye protection	During procedures and patient-care activities likely to generate splashes or sprays of blood, body fluids, secretions, especially suctioning, endotracheal intubation	

- Cognitive function (understands directions)
- Cooperative (willing and able to follow directions)
- Continent (of urine or stool)
- Contained (secretions, excretions, or wounds)
- Cleanliness (capacity for personal hygiene)



"Dress for the Occasion"



If you anticipate the chance of being splashed, splattered, or contaminated in any way by the job you are about to perform...

PPE is required.



Laundry Services

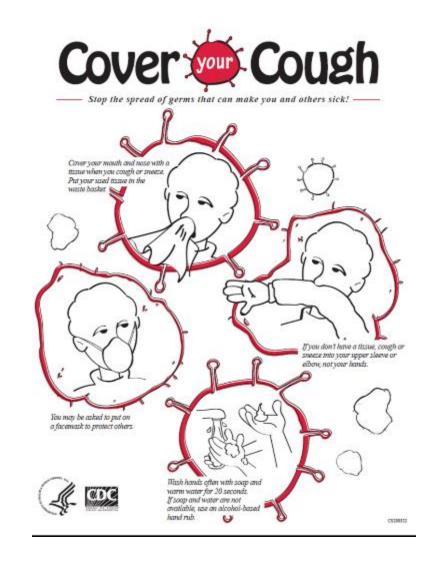
- Use Standard Precautions and minimal agitation for handling contaminated linen and hold it away from your clothing/body during transport.
- Bag/Contain contaminated linen where it's collected.
- Transport/Store clean linens by methods that ensure cleanliness.





Good Cough Etiquette

- Cover mouth and nose with a tissue when coughing or sneezing
- Dispose of used tissue in the waste basket
- If tissue is not available, cough or sneeze into upper sleeve or elbow
- Hand hygiene
- Wear a facemask to protect others





Transmission-Based Precautions

- Contact Precautions:
 - Clostridioides difficile
 - MRSA
 - Norovirus
 - Scabies
 - VRE
 - CRE
- Droplet Precautions:
 - Influenza
 - Covid
 - Pertussis
 - Mumps
- Airborne Precautions PPE and containment until transfer



MDRO

- Facilities need balance:
 - Prevention of possible disease transmission
 - Consequences of social isolation.
- Individually assess each resident for risk factors and use the least restrictive approach:
 - Wounds
 - Indwelling devices
 - Ability to contain secretions
 - Ability to follow instructions
 - Behaviors
 - Personal hygiene



WHAT IS COHORTING?

- Grouping residents infected or colonized with the same infectious agent together to confine their care to one area
- Grouping healthcare personnel to a cohort of residents





Airborne Precautions

- Varicella (Chickenpox, disseminated shingles), TB, SARS, Measles. Smallpox
- Resident is masked and placed in a private room with door closed until transferred to facility with negative air room



Droplet Precautions

- Used for influenza, meningitis, mumps, covid*
- Required PPE: Surgical mask, gloves and eye protection when working closely with the resident (within 3-6 feet)
- *NOISH-approved N95 or equivalent or higher-level respirator recommend for covid at all times
- Hand hygiene





Contact Precautions

- Used for multidrug-resistant organisms,
 C. difficile, norovirus, shingles in immunocompromised and drainage unable to be contained
- Hand hygiene
- Gown and gloves upon ANY room entry
- Room restriction except for medically necessary care





Residents are at Increased MDRO Risk

- Invasive medical devices
- Improper use of antibiotics
- Poor hand hygiene
- Ineffective environment cleaning
- Resident challenges acuity, mentation, "stuff"
- Congregate living
- Staffing turnover
- Dependence on unlicensed caregivers
- Blunted immune responses



Enhanced Barrier Precautions





Enhanced Barrier Precautions

- Applies to all residents with any of the following:
 - Wounds and/or indwelling medical devices regardless of MDRO colonization status
 - Infection or colonization with a novel or targeted MDRO when Contact Precautions do not apply
 - Facilities may consider applying to residents infected or colonized with other epidemiologically important MDROs
- Gown and gloves prior to the high contact care activity
- No room restriction



Enhanced Barrier Precautions

- "Focusing only on residents with active infection fails to address the continued risk of transmission from residents with MDRO colonization, which can persist for long periods of time (e.g., months), and result in the silent spread of MDRO."
- Enhanced Barrier Precautions refer to the use of gown and gloves during high-contact resident care activities that provide opportunities for transfer of MDRO to staff hands and clothing.
- Residents are not restricted to their rooms or limited from participation in group activities.



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Summary

- Infection prevention is everyone's responsibility!
- Protecting residents and staff from infections and harm is a basic standard of care.
- Precautions should be understood and followed by all members of the care team.
- Residents are at increased risk of infection
- CMS requires LTC to provide a "home-like environment" and "person-centered care."
- Facilities need to provide a safe environment for all residents
- Leadership involvement is essential!



Infection Prevention Saves Lives

We do what we do for...

- Our residents and their loved ones
- Ourselves and our colleagues
- Our loved ones





Infection Prevention

"To ensure the protection of those who might be vulnerable to acquiring an infection both in the general community and while receiving care due to health problems, in a range of settings."

- World Health Organization



Infection Control Training Tools:

- https://www.cdc.gov/longtermcare/training.html
- https://spice.unc.edu/ltc/

Respiratory Protection Program:

- https://www.cdc.gov/niosh/npptl/hospresptoolkit/programeval.html
- https://www.ecdc.europa.eu/en/all-topics-z/coronavirus/threats-andoutbreaks/covid-19/prevention-and-control/LTCF-resources

Gap Analysis:

https://www.cms.gov/files/document/qso-20-03-nh.pdf

Surveillance:

 https://www.apic.org/Resource_/TinyMceFileManager/Practice_Guidance/AJIC-Surveillance-2007.pdf



Enhanced Barrier Precautions:

- https://www.cdc.gov/hai/pdfs/containment/enhanced-barrier-precautionssign-P.pdf
- https://www.cdc.gov/hai/containment/faqs.html

COVID-19 Enhanced Focus Survey:

https://www.cms.gov/Medicare/Provider-EnrollmentandCertification/GuidanceforLawsAndRegulations/Nursing-Homes

https://ahca.myflorida.com/docs/FHCACOVIDVisitorScreeningToolkit.pdf.

IP Training:

https://www.train.org/cdctrain/training_plan/3814

https://apic.org/education-and-events/ltc-certificate/



Risk Assessments:

- https://qioprogram.org/facility-assessment-tool
- https://www.cdc.gov/infectioncontrol/pdf/icar/ltcf.pdf
- https://www.cdc.gov/coronavirus/2019-ncov/downloads/hcp/assessmenttool-nursinghomes.pdf
- https://spice.unc.edu/resource/template-risk-assessment-for-ltc/
- https://www.cdc.gov/coronavirus/2019-ncov/downloads/hcp/nursinghome-icar-facilitator-guide.pdf



Antibiotic Stewardship:

- https://www.cdc.gov/getsmart/community/materialsreferences/printmaterials/hcp/viral-rx-pad-color.pdf
- https://www.cdc.gov/antibioticuse/community/pdfs/aaw/CDCAU_RCx_Relief_for_Viral_Illness_sm_v8_508.pdf

AHRQ Hand Hygiene Assessment Tool:

 https://www.ahrq.gov/nursing-home/materials/prevention/hand-hygieneobservational-audits.html

Emergency Preparedness Resource Document

 https://files.constantcontact.com/6d4c737e001/19cff006-d6f1-47a5-b60b-04fbae5bc4ab.pdf



What questions do you have?



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 Bloodborne Pathogens. Occupational Safety and Health Administration.
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Thank You!



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