

Regulatory Focus for Nursing Homes Infection Prevention and Control

The New York Academy of Medicine

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November 2020

DISCLOSURES

- Preferred Medical Incorp (PDI) - lecturer
- ECRI –consultant
- Medical Illumination International (Medillum) - consultant
- UPFLEX – lecturer/consultant
- Rockpointe Education- lecturer
- Armstrong Inc. - consultant

GOALS OF CURRENT LECTURE

- Critically examine evidence-based practice guidelines for infection prevention and control (IPC) in skilled nursing and assisted living facilities

Centers for Medicare and Medicaid Services (CMS) is responsible for assessing Infection Prevention and Control compliance with “minimum health and safety standards”

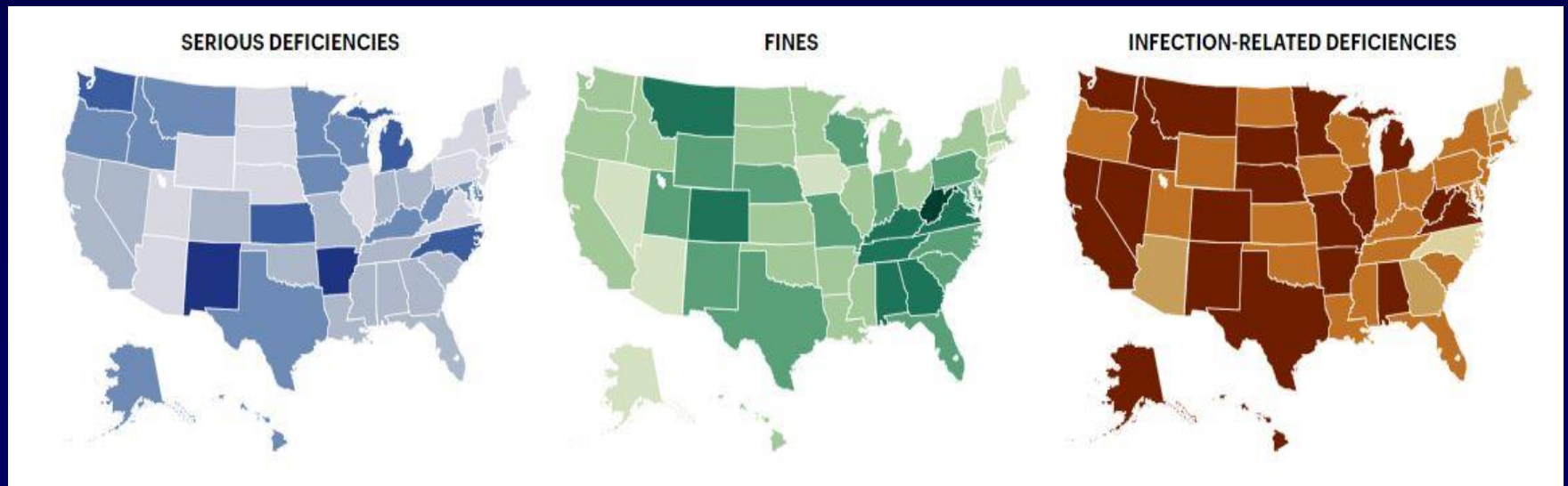
- Key barriers to implementing these best practices, *Interpretative guidance limitations and lack of facility and surveyor IPC training.*

- Propose sustainable regional and global solutions.
Discuss the positive results of a pre-post ICW based pilot study.

ProPublica: Inconsistent Penalties Across the Country

<https://projects.propublica.org/nursing-homes/>

Infection Control tags are the #1 or #2 most cited violations!



Notice of Proposed Rule Making (NPRM) Overview

- LTC proposed rule was published in the Federal Register on July 16, 2015.
 - <http://www.gpo.gov/fdsys/pkg/FR-2015-07-16/pdf/2015-17207.pdf>
- Had not been comprehensively updated since 1991 despite significant changes in the industry.

Division of Nursing Home (DNH)

Notice of Proposed Rule Making (NPRM)

Draft Infection Prevention and Control regulations

Activity: *Revision of Interpretative Guidance with new requirements for compliance:*

1. Antibiotic stewardship program
2. Facility IPC risk assessment
3. Require a trained part-time infection preventionist onsite.
4. IP and Quality Assurance Committee

Revised Nursing Home F-Tags

42 C.F.R. §483.80

Infection Control Interpretive Guidance

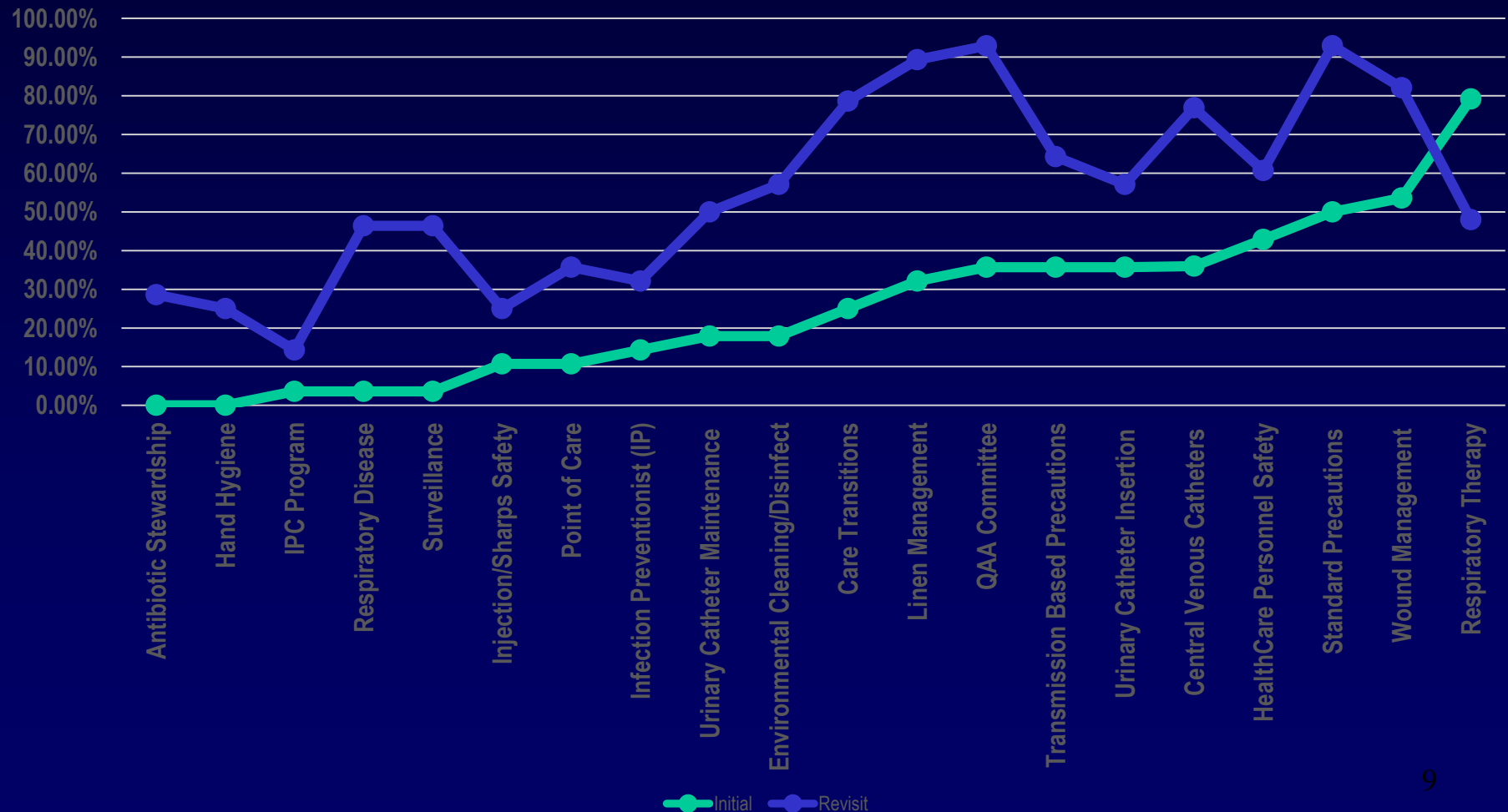
- F880 (“Old F441”) : Infection Prevention and Control
§483.80 (a)(1-2)(4)(e-f) – **effective November 2016**
- F881: Antibiotic Stewardship Program
(New) §483.80 (a)(3) – **delayed effective November 2017**
- F882: Infection Preventionist Qualifications/Role
(New) §483.80 (b-c) – **delayed effective November 2019**

CMS IPC Pilot Project Surveys

- Unannounced surveys
- Educational surveys – no citations (except IJ)
- 2017: 40 hospital and 40 nursing home paired surveys
 - Review findings
 - Technical assistance - action plans for improvement (HAI coordinators and QIOs/QINs)
 - 2018: Revisit surveys

Comparison of Modules Between Initial and Revisit Surveys

- Year 3, 28 NHs underwent a second survey using the same ICWS tool



Summary

- Regulatory oversight is key to sustained and broad implementation of improved IPC practice in nursing homes.