

ACTION BRIEF COVID-19 Infection Control Focused Survey

HIGHLIGHTS: COVID-19 Infection Control Focused Survey

On March 23, 2020, CMS announced federal and state surveyors will conduct targeted infection control surveys of providers. They will base the survey on abbreviated infection & prevention survey tool.

Surveyors will review:

- Implementation of the infection prevention and control program components, including copy of the required policy and procedure, staff training, and infection logs
- Observe staff compliance with Standard and Transmission-Based Precautions (taking into consideration critical shortages of PPE), including hand washing, PPE donning & doffing
- Observe care practices with COVID-19 positive residents
- Surveillance log and reporting for residents with infections or infectious symptoms
- Visitor entry and facility screening practices and logs of screenings
- Copies of education, monitoring and screening practices of staff
- Facility policies and procedures to address staffing issues during emergencies, including COVID-19 transmission

REVIEW & ACTION: Implementation Strategies and Tips

	<i>Preparation for COVID-19 Infection Control Focused Surveys</i>
<i>Use Survey Tool</i>	Use the COVID-19 Infection Control Focused Survey tool to perform self-assessments of your facility's infection control plan. Keep a copy as it may be requested by surveyors.
<i>Surveillance & reporting</i>	CDC recommends that nursing homes notify their health department about residents with any severe respiratory infection (e.g. COVID-19), or a cluster of respiratory illness (3 or more residents or health care providers with new onset of symptoms within 72 hours)

<i>Peer Monitoring</i>	Use peers to monitor each other for adherence to infection control policies and procedures such as handwashing and PPE donning/doffing, the two most common reason for citations, including all relevant staff including housekeeping, maintenance, and food service in this process.
<i>Everyone's at risk of transmission</i>	Every interaction (staff to staff or staff to resident) increases the risk of transmission. Everyone in the organization from clerical and housekeeping staff to nurses and physicians need to follow infection control practices and procedures for the facility.
<i>Empowerment</i>	Empower residents and any staff to speak up to remind others when they see an incorrect practice such as improper handwashing or improper mask use that could lead to the spread of infection.

What else can you do to prepare for this new focused survey?

- Reduce the number of people interactions with residents – because every interaction is a risk for spread
- Conduct self-assessment to evaluate your infection control program using CMS tool
- Implement peer monitoring and just-in-time education (e.g. hand hygiene, PPE practices)
- Educate all staff to be aware of common infection control deficiencies (e.g. inappropriate hand hygiene practices, inappropriate use of PPE and donning/doffing practices)
- Educate all staff on standard and transmission-based precautions and how to use CDC conservation measures for PPE
- Observe staff to ensure proper procedures are being used for handwashing, donning and doffing of PPE; consider enlisting residents in this process and including non-nursing staff
- Educate residents on basic infection control practices (e.g. cough etiquette, letting staff know when they don't feel 100%, staying in their room, hand hygiene) and source control masks
- Communicate with family members about the importance of basic infection control practices
- Evaluate your staffing policies and procedures during crisis and make updates as needed

TIPS

- **Use the CMS Infection Control Focused Survey Tool to self-assess before survey is performed in your facility**
- **Incorporate peer-to-peer monitoring of infection control practices**
- **Observe staff practices to verify proper procedures are being performed and provide just in time teaching as needed**
- **Ensure you communicate with all staff about infection control practices and training updates and reminders as needed**



RESOURCES: Additional Materials to Help You

1. AHCA/NCAL COVID-19 [Update #18](#)
2. [Infection Control Focused Survey Tool](#)
3. [CMS QSO-20-20-All Memo](#) on Prioritization of Survey Activities
4. AHCA/NCAL [Infection Prevention Control Officer training](#)
5. [COVID-19 education](#) on ahcancaIED
6. AHCA/NCAL dedicated [COVID-19 webpage](#)
7. CDC's [COVID-19 webpage](#)
8. CDC's [COVID-19 Preparedness Checklist](#) for Nursing Homes and other Long Term Care Settings
9. White House, CDC, FEMA [dedicated webpage](#)