

## **CMS Introduces LTC Infection Prevention Assessment Tools As a New Standard Amid COVID-19 Pandemic**

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The COVID-19 pandemic has affected many aspects of our lives. For long term care providers, this has affected day-to-day operations in a way that could almost never have been imagined. Historically, when learning about emergency and disaster preparedness, our focus has been on environmental-type situations such as Hurricane Katrina and the California fires.

Those situations prompted the drafting and implementation of emergency preparedness regulations applicable to healthcare providers of all types. For instance, the emergency preparedness regulations and the Facility Assessment Tool regulation.

These regulations and consequential procedures are important to practice and maintain during this pandemic; however, COVID-19 presents another wrinkle for long term care providers: infection control.

There has been an increased focus on infection control regulation as of late, with the inception of infection preventionists and the like. Now, more than ever, might be the perfect opportunity to document in accordance with both the facility's emergency preparedness procedure and in a way that can provide a framework for an effective infection prevention protocol during an emergency such as this. Hindsight is 20/20. Therefore, having documentation identifying and/or describing actions taken during this emergency, will likely make it easier to modify and update the facility's emergency preparedness policy and procedure when the pandemic has ceased.

CMS has recently posted a Facility self-assessment tool for COVID-19. It comprises both regulatory requirements and best practices in infection prevention and control, including recommendations for documenting compliance. The tool can be located at: [https://qsep.cms.gov/data/252/A\\_NursingHome\\_InfectionControl\\_Worksheet11-8-19508.pdf](https://qsep.cms.gov/data/252/A_NursingHome_InfectionControl_Worksheet11-8-19508.pdf)

The self-assessment covers the following areas: Infection Control program infrastructure and Infection Preventionist; Infection Preventionist relationship to Quality Assurance Committee; Infection surveillance and outbreak response; Influenza and pneumococcal Immunization; Linen management; Infection prevention during transitions of care; and Water Management Program.

CMS has also issued a Head to Toe Infection Prevention (H2T) Toolkit, which can be downloaded from here: <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/LTC-CMP-Reinvestment>

The Head to Toe Infection Prevention Toolkit contains educational materials and practical tools to support the clinical team in providing person-centered care that helps prevent and control common infections like pneumonia, skin infections, and urinary tract

infections. The Toolkit aims to educate licensed nurses and nurse aides on infection prevention practices and provide tools that can be integrated into their daily work.

The H2T Toolkit consists of the following components: Implementation Guide; Infection Prevention Handbook; Staff Presentation; Resource for Residents and Loved Ones; Observation Guide; Customizing Care Tool; and Suspected Infection Investigation Tool.

These documents will likely serve as regulatory compliance assessments and should be considered an important resource during this difficult time.

Please also remember that while utilizing your Facility Assessment Tool and Emergency Preparedness plans, take the time to identify the date(s) of review and/or modification in an effort to support compliance with the at-least annual review requirements found in the federal regulations.