



Jump Start your Infection Control Program

An Overview of the Infection Control Focused Survey for Nursing Homes



CMS Quality Safety and Oversight Memo

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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Center for Clinical Standards and Quality/Quality, Safety & Oversight Group

Ref: QSO-20-20-All

DATE: March 23, 2020
TO: State Survey Agency Directors
FROM: Director
Quality, Safety & Oversight Group
SUBJECT: Prioritization of Survey Activities

Memorandum Summary

- *The Centers for Medicare & Medicaid Services (CMS) is committed to taking critical steps to ensure America's health care facilities are prepared to respond to the threat of disease caused by the 2019 Novel Coronavirus (COVID-19).*
- On Friday, March 13, 2020, the President declared a national emergency, which triggers the Secretary's ability to authorize waivers or modifications of certain requirements pursuant to section 1135 of the Social Security Act (the Act). Under section 1135(b)(5) of the Act, CMS is prioritizing surveys by authorizing modification of timetables and deadlines for the performance of certain required activities, delaying revisit surveys, and generally exercising enforcement discretion for three weeks.
- During this three-week timeframe, **only** the following types of surveys will be prioritized and conducted:
 - **Complaint/facility-reported incident surveys:** State survey agencies (SSAs) will conduct surveys related to complaints and facility-reported incidents (FRIs) that are triaged at the Immediate Jeopardy (IJ) level. A streamlined Infection Control review tool will also be utilized during these surveys, regardless of the Immediate Jeopardy allegation.
 - **Targeted Infection Control Surveys:** Federal CMS and State surveyors will conduct targeted Infection Control surveys of providers identified through collaboration with the Centers for Disease Control and Prevention (CDC) and the HHS Assistant Secretary for Preparedness and Response (ASPR). They will use a streamlined review checklist to minimize the impact on provider activities, while ensuring providers are implementing actions to protect the health and safety of individuals to respond to the COVID-19 pandemic.
 - **Self-assessments:** The Infection Control checklist referenced above will also be shared with all providers and suppliers to allow for voluntary self-assessment of their Infection Control plan and protections.

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- Surveys will be prioritized and conducted only by:
 - Complaint/facility reported incident surveys Immediate Jeopardy (IJ) level
 - Targeted Infection Control Surveys
 - Self-assessments

<https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Policy-and-Memos-to-States-and-Regions>



COVID-19 Focused Survey as a Checklist

- Using the survey as a self-assessment tool
 - Review of actual survey
 - Summary section



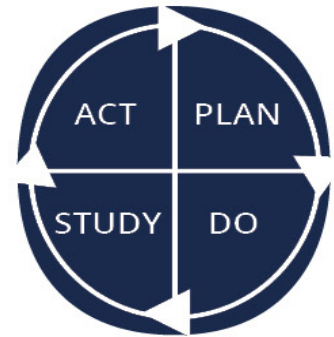
Infection Control Checklist Process using QAPI

- Identify a champion
 - Seven focus areas (ex consider a champion for each area)
- Analyze your data
 - How do we know every area is complete?
 - How will we measure (audits, competency checks, observation)?



Infection Control Checklist Process Using QAPI

- What happens when you identify a gap
 - Perform a quick root cause analysis with those people closest to the process
 - Test a change using Plan-Do-Study-Act
 - Communicate the change
- Sustain the change
 - Policy, work schedules
 - Ongoing monitoring



Additional Self-Assessment tool

- Infection Prevention and Control Assessment Tool
 - More comprehensive
 - Includes additional areas for surveillance besides Covid
 - Nine domains for ongoing IPCP program
 - Includes direct observation worksheets



Resources

- [Focused survey self-assessment tool](#)
- [Summary of the focused survey tool](#)
- [Infection Prevention and Control Assessment tool](#)
- [Corona Virus Preparedness checklist for NH and LTC settings](#)
- [LTCF transfer scenario](#)

(All available on Quality Insights' Online [Coronavirus Info Center](#))



Next Steps...

- Chat
 - Areas of focus that you need more assistance with related to focused survey assessment
 - Other questions/comments
- Email for questions
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