COVID-19 Webinar for Laboratory Accreditation

Q&A With The Joint Commission

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Panel

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Infection Control Practices
Pre-Submitted Questions

As a testing lab for COVID, we report all the results to Department of Public Health, and they report to State of California. Who is responsible for reporting to the Federal government?

Centers for Disease Control and Prevention
FAQ: COVID-19 Data and Surveillance (updated Nov 20, 2020)

COVID-19 Pandemic Response, Laboratory Data Reporting: CARES Act Section 18115 (updated Jan 8, 2021)
Pre-Submitted Questions

Other than proper PPE, what should the risk assessment for COVID testing focus on?

**OSHA**
COVID-19 Control and Prevention: Laboratory Workers and Employers (accessed March 15, 2021)
https://www.osha.gov/coronavirus/control-prevention/laboratory
COVID-19: Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace
https://www.osha.gov/coronavirus/safework#role-employers-workers
Pre-Submitted Questions

What are the PPE and engineering recommendations in the laboratory to mitigate risks?

Can we perform rapid COVID testing on a regular workbench behind a safety shield with all testing personnel wearing full PPE, mask, gloves, lab coat and face shield?

Centers for Disease Control and Prevention
Guidance for SARS-CoV-2 Point-of-Care and Rapid Testing (last updated March 12, 2021)
Pre-Submitted Questions

Please discuss the wearing of masks outside of the healthcare setting.

Centers for Disease Control and Prevention
Your Guide to Masks (updated Feb 22, 2021)

Improve How Your Mask Protects You (updated Feb 13, 2021)
Pre-Submitted Questions

Staff are utilizing cloth masking over a disposable mask and staff are double-masking with disposable masks. Are these acceptable everyday practices?

Centers for Disease Control and Prevention
Strategies Improve How Your Mask Protects You (updated Feb 13, 2021)
Pre-Submitted Questions

How does The Joint Commission survey the re-use of PPE??

Centers for Disease Control and Prevention
Optimizing Supply of PPE and Other Equipment during Shortages (updated July 16, 2020)

Summary for Healthcare Facilities: Strategies for Optimizing the Supply of PPE during Shortages (updated Dec 29, 2020)
Pre-Submitted Questions

How will the CMS Focused Infection Control Survey Tool be surveyed?

Centers for Medicare & Medicaid Services
QSO-21-08-NLTC Revised COVID-19 Focused Infection Control Survey Tool for Acute and Continuing Care (Issued Dec 30, 2021)
Pre-Submitted Questions

What documentation is expected, if any, for visitor screening??
Pre-Submitted Questions

How will the surveyors adhere to infection prevention and control restrictions during in-person surveys?

The Joint Commission COVID Resources
Regular surveys and reviews to resume in June — with some changes to protect safety (Issued May 27, 2020)
General Questions
Pre-Submitted Questions

Are rural health clinics with a CLIA Certificate Of Waiver (COW) required to perform proficiency testing if they want to provide COVID testing?
Pre-Submitted Questions

Are there any new COVID-19 laboratory standards for Joint Commission inspections?
Pre-Submitted Questions

Are there any new or updated COVID-19 report requirements for hospital laboratories with respect to COVID-19 results, antibody titers, turn-around-times, etc.?
Pre-Submitted Questions

Can you describe if there are any laboratory activities that may or may not be performed by personnel from home during the EUA?
Pre-Submitted Questions

Do we have to correlate different COVID-19 PCR methods when each method is detecting different genes?
Pre-Submitted Questions

With EUA-approved COVID-19 PCR tests, can RNA extraction be modified? Meaning, can we use a different instrument as long as we validate it using laboratory-developed test (LDT) requirements including sensitivity, specificity and in the results field include a comment that the extraction was modified?
What are the validation requirements for EUA tests?
Pre-Submitted Questions

If a vendor added the SARS-CoV2 test to a test cartridge with RSV and FLU, does that invalidate the IQCP completed for the RSV FLU cartridge?
Pre-Submitted Questions

Is a Laboratory Risk Assessment required for COVID-19?
Pre-Submitted Questions

Are Individualized Quality Control Plans (IQCP’s) needed for EUA tests?
Pre-Submitted Questions

What is best practice QC frequency for EUA "waived" tests?
Pre-Submitted Questions

Will the regulatory compliance expectations for EUA tests change once they are no longer considered EUA?
CMS 1135 Waivers
Is there a formal process for 1135 waivers?

Are waivers still good and through when?
Public Health Emergency (PHE) Extension

The Department of Health and Human Services released a statement on Thursday, 01/07/21 stating the PHE was extended.

The renewal effective date is Thursday 01/21/21 and will last for 90 days.

This is the fourth extension of the PHE.

1135 Waivers will remain in effect during the declared PHE.
Pre-Submitted Questions

Looking for more information on CMS 1135 Waivers?

Accredited organizations can learn more by visiting Resources and Tools > Tools > Learn More in their Joint Commission Connect® extranet site.
By chance, have you heard of any updates to extending the EUA's on COVID testing?
Pre-Submitted Questions

How much emphasis will be placed on the EOP plan and will scoring apply?
Pre-Submitted Questions

Would you please clarify if there is any current grace for staff annual education/competencies in 2020?
Recovery and The Joint Commission
Your questions

You have had a number of questions about our return to survey:

• How or when will we get a survey?
• What will that survey process look like, any differences?
• What type of instruction have you provided your surveyors?
• What will the surveyors focus on?
When and how will survey activity resume?

- Survey activity has resumed and we are transitioning from off-site surveys back to onsite surveys.
- Counties are opening up across the US as “Go” counties or low risk counties.
- **Low risk criteria**
  - Number of COVID-19 cases are lower and less impact to organizations
  - Number of COVID-19 cases/1,000 population and new cases within the county
  - Determination that our staff can travel to that area safely and find appropriate accommodations.
- For Lab surveys, effective March 15, the AE will no longer contact organizations regarding the scheduling of an on-site event. Organizations should monitor the Notification of Scheduled Events section of the Joint Commission Connect page for notification.
- We are aware that surveys are past their due dates, CMS is also aware – we will conduct those surveys when we are able to do so.
- We will prioritize initials and past due organizations.
Should we expect the survey to be longer or shorter?

- For both offsite and onsite surveys, the length of the survey will remain the same as it has been in the past.
What instructions have been provided to our field staff?

- Do not travel if you are sick
- Do not travel if you have been in close contact with known or suspected COVID-19 patients
- When traveling they are required to wear a mask/face covering
- **Required to wear a mask on survey and follow the organizations’ guidelines. The organization will provide the PPE to the surveyor as required by their policy.**
- Practice physical distancing
- Practice good hand hygiene
- Follow CDC guidelines
What has changed about the on-site survey process?

The survey process and its components will remain the same however here are some guidelines for the survey:

• **Practicing safe social distancing:** Limit the number of individuals in group sessions, minimize the number of staff who accompany a surveyor during tracer activities. Drive in separate vehicles to off site visits. Utilize technology when possible.

• **Wearing personal protective equipment:** The surveyors are required to wear face masks and we are asking that organizations provide masks and/or other PPE to surveyors based on the organization’s policy.
What has changed about the on-site survey process?

The survey process and its components will remain the same however here are some guidelines for the survey:

• Utilization of enhanced technology: The goal is to maximize technology to support social distancing. This may be accomplished through screen sharing, or projection to review EMR with the organization IT platform.
• Surveyors will NOT enter at risk or confirmed COVID-19 rooms.
• Surveyor will have limited physical review of high-risk procedures
• Surveyor can consider using a simulation and/or distant review of certain activities/procedures.
What will be the focus of survey activities?

During the opening conference, the surveyor will have a discussion with you about the impact of the current pandemic and your organization’s response.

- We will discuss both Infection Control and Emergency Management.
- Since there were no specific waivers for Laboratory, the surveyors will still review Proficiency Testing, quality control, competency, etc. since all of those impact the accuracy of results.
Offsite (virtual) survey

- **Offsite (virtual) survey**— we have been transitioning away from this model effective March 15th
- Laboratory surveys will primarily be conducted onsite
- If an offsite event is already in progress, i.e., dry run conducted, the following will be used to conduct the survey:
  - Secure Zoom technology for the survey and facility review
  - Use of a secure SharePoint site for document upload to review pre-survey
  - Use of a webcam for laboratory tours and point of care testing sites.
- Laboratory offsite surveys do not require a follow-up onsite event
Additional Questions

For onsite surveys, should staff/surveyors be vaccinated?

- It is not a requirement that staff/surveyors be vaccinated, although it is encouraged.
- Many surveyors are vaccinated and can travel to additional counties.
Reporting COVID Results

What evidence of compliance with reporting COVID results to fed/state/local authorities will The Joint Commission be looking for on survey?

- Surveyors will be looking for evidence that ALL COVID test results, both positive and negative, have been reported to the state or local authorities.
Additional information

We would ask that you do not provide additional avoid dates due to the difficulty in scheduling surveys – avoid dates already submitted will be honored to the extent we can do so.
Community Prevalence Dashboard

https://www.jointcommission.org/resources/research/operations-support-research/
How long do you expect it will take to clear the survey backlog?
What do our case rates need to be to have an onsite Lab survey?
What is the latest update on Lab Accreditations that are past due?
Pre-Submitted Questions

What will the tracers include?
Pre-Submitted Questions

Will a three-day lab survey be virtual or onsite?
Environment of Care and Life Safety
As a small critical access hospital, we have a negative airflow hood in our lab. Is there a requirement that requires the entire lab department to be negative airflow?
Surge capacity from ED, does this whole or entire hold section need to be negative pressure?
Time for a few more questions
COVID-19 Resources

What Your Organization Needs to Know About the Coronavirus

Trusted Guidance. Trusted Resources.

View resources
Resources

- COVID Resources
  - https://www.jointcommission.org/covid-19/

- Standards Interpretation
  - https://www.jointcommission.org/standards/standard-faqs/
Thank You

We support your efforts in response to the COVID-19 pandemic and hope to provide helpful resources.