Q&A With The Joint Commission

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Panel

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Environment of Care and Life Safety
As we try to make other accommodations for the flow of air HEPA filters, are there any suggestions around ligature and safety in a psych unit?
Is it acceptable to place signs or tape on chairs to promote social distancing? Or, do chairs not being used need to be removed totally?
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 in both offsite and onsite form.
- Limited onsite survey activity is being conducted in low-risk areas.
- **Low risk criteria**
  - Number of COVID-19 cases are lower and less impact to organizations
  - the # cases/thousand population and new cases within the county
  - Determination that our staff can travel to that area safely and find appropriate accommodations.
- For full 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.
- Prioritized initials and past due organizations. Offering offsite surveys and utilizing the low-risk criteria for onsite surveys.
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 home visits. Interviewing patients and staff by telephone or virtual home visits.

- **Wearing personal protective equipment:** The surveyors are required to wear face masks, we are asking that organizations provide masks and/or other PPE to surveyors based on the organization’s policy.
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:

- **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 and interviewing patients and staff.
- **Surveyors will NOT Enter** at risk or confirmed COVID-19 rooms or homes.
- **Surveyor will have limited physical review** of high risk and aerosol generating procedures.
- **Surveyor can consider using a simulation and/or distant review** of certain activities/procedures.
- **The process for surveying Telehealth services has not changed.** An example of the technology should be available during the survey event.
Offsite (virtual) survey

- **Offsite (virtual) survey**— will be scheduled for organizations who meet eligibility criteria
- BHC surveys will primarily be conducted offsite
- Offsite event is a combination of:
  - Secure Zoom technology for the survey and facility review
  - Use of a secure SharePoint site for document upload to review pre-survey
- A dry run test of technology will be conducted prior to the event
- BHC surveys do not require a follow-up onsite event
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.
• The focus of our survey will not be the timeframe of the public health emergency but the current situation within your organization.
Additional Questions

• Would The Joint Commission consider continuing the virtual platform even after the pandemic restrictions are lifted (e.g. SharePoint, Zoom)?
• For onsite surveys, should staff/surveyors be vaccinated?
• Does The Joint Commission look for evidence of staff training regarding collaboration with high to moderate risk clients on "The Safety Planning Intervention"?
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.

• If an onsite survey is not possible in your area, your AE will contact your organization to determine whether the survey can be conducted offsite.
Community Prevalence Dashboard

Operations Support Research
Analysis and interpretation of data to inform and support Joint Commission programs and services.

COVID Community Prevalence Dashboard
This interactive dashboard is intended to provide some insight into the factors that The Joint Commission considers when evaluating community COVID prevalence. Users can select a specific state and county to assess current COVID incident rates and trends.

https://www.jointcommission.org/resources/research/operations-support-research/
General
Would you please clarify if there is any current grace for staff annual education/competencies in 2020?
Are there formal recommendations for returning to in-person counseling services?
Tell us about COVID medication therapies. How does The Joint Commission evaluate investigational and emergency use authorized medications?
Due to COVID, how are other hospitals requiring group activities or therapies be held? (small groups, individual therapy, in milieu?)
Infection Control
Does The Joint Commission have specific requirements for COVID-19 management such as masking, safe physical distancing and COVID-19 testing of patients coming on site?
Pre-Submitted Questions

With the changes per CDC regarding COVID-19, should healthcare professionals continue with current standards?

Resources:
Infection Control Guidance for Healthcare Professionals about Coronavirus (COVID-19)

Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination
During survey, what are the major infection control elements The Joint Commission will be looking for?
Pre-Submitted Questions

What type of COVID-19 documentation is The Joint Commission looking for?

• Infection Prevention and Control Plan or Risk Assessment
• Are there any requirements for documentation specific to COVID-19?
Where can I find the best practices to prevent spread of COVID-19 among behavioral health patients in various settings and for specific scenarios?

**Resources:**

Infection Control Guidance for Healthcare Professionals about Coronavirus (COVID-19)

Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination

CMS COVID-19 Infection Control for Psychiatric and Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID)

SAMHSA COVID-19:Interim Considerations for State Psychiatric Hospitals
How long will masking be required in behavioral health settings?

Resources:
Infection Control Guidance for Healthcare Professionals about Coronavirus (COVID-19)

CMS COVID-19 Infection Control for Psychiatric and Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID)

Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination
What are the expectations for masking:
• In IOP programs or in psychiatric hospitals with group therapy
• Pediatric populations coming in for counseling
• In acute/congregate behavioral settings
• During group meals
• While in group sessions

Resources:
Infection Control Guidance for Healthcare Professionals about Coronavirus (COVID-19)

Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination

Pre-Submitted Questions
Pre-Submitted Questions

Where can organizations find guidance for difficult patient scenarios such as:

• How to get patients to wear masks
• COVID-19 involuntary patients who need inpatient behavioral health services and are not ill enough for medical admission that will not adhere to the organization's isolation precautions.

Resource:
CMS COVID-19 Infection Control for Psychiatric and Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID)
Pre-Submitted Questions

Beyond masks, what PPE is recommended for behavioral health clinicians during in-person meetings?

Resource:
Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic
What type of PPE needs to be worn by staff and patients, in behavioral health settings if both the patient and staff are fully vaccinated for COVID-19?

Resources:
Infection Control Guidance for Healthcare Professionals about Coronavirus (COVID-19)

Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination
Do behavioral health organizations need to have a respiratory protection program and fit-test staff for respirators related to potential COVID-19 cases.

**Resources:**
OSHA Personal Protective Equipment Standard

OSHA Respiratory Protection Standard
Pre-Submitted Questions

What is best practice regarding cohorting for:

- COVID-19 positive patients on the same unit as COVID negative patients
- Geriatric behavioral health patients together in the same room that have had (or not had) the COVID-19 vaccine
- Patients in dual-occupancy patient rooms
- COVID-19 negative patients who are fully vaccinated, but require the use of a CPAP machine

Resources:

Infection Control Guidance for Healthcare Professionals about Coronavirus (COVID-19)

Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination
Is visitor screening required, such as temperature monitoring at the organization entrances?

Resource:
Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic
Pre-Submitted Questions

How do we balance our staff requests to be together at mealtime with our organization’s mandatory masking policy?

Resources:
Infection Control Guidance for Healthcare Professionals about Coronavirus (COVID-19)

Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination
Pre-Submitted Questions

Are there any updated COVID-19 testing protocols including:
• Recommended retesting intervals for inpatient populations?
• Protocol for rapid testing?

Resources:
Infection Control Guidance for Healthcare Professionals about Coronavirus (COVID-19)

Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination
CMS 1135 Waivers
Pre-Submitted Questions

What date does the CMS 1135 Waiver expire?

Please discuss status of the 1135 Waiver and timeframe till end.

Can we review the Waiver?
The Department of Health and Human Services released a statement on Thursday, 04/15/21 stating the PHE was extended.

The renewal effective date is Thursday 04/21/21 and will last for 90 days.

This is the fifth extension of the PHE.

1135 Waivers will remain in effect during the declared PHE.
Accredited organizations can learn more by visiting Resources and Tools > Tools > Learn More in their Joint Commission Connect® extranet site.
Pre-Submitted Questions

How long will the CMS 1135 Waiver be effective for and does The Joint Commission have guidance on how inpatient mental health hospitals should navigate the 482.13(e)(1)(ii) regarding use of seclusion for COVID management?
Can you explain the process of determining if the 1135 Waiver actually applies to your facility?
What are the expectations of CMS and Joint Commission documentation for facility response measures to the pandemic?
Thank You

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