COVID-19 Webinar for Home Care Accreditation

Q&A With The Joint Commission

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Your questions

You have had several 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 is being conducted in low-risk areas – including Home Care

• 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.

• The AE will no longer contact organizations regarding the scheduling of an on-site event. Organizations should continue to monitor the Notification of Scheduled Events section of the Joint Commission Connect page for notification on the first day of survey.

• 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. We will also be looking for organizations due in the next few months that meet the low-risk criteria and are currently ready for survey.
The Joint Commission required staff (surveyors) that interact with organizations to be fully vaccinated by October 18, 2021.
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 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 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 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.
Offsite (Virtual) Survey

- **Offsite (virtual) survey**—may be scheduled for some organizations who meet eligibility criteria.
- 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
  - Most offsite events will have 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 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 off site with an onsite evaluation taking place for those who meet the follow-up requirement.
Community Prevalence Dashboard

[Image of the Community Prevalence Dashboard]

https://www.jointcommission.org/resources/research/operations-support-research/
General Questions
What is the determining factor for use of telehealth visits, and how long will these visits continue to be utilized?
How do all the updates and changes since COVID apply to a final Pandemic Emergency Preparedness Plan? Do all updates from the beginning of the pandemic need to be kept in the EP?
There was a time where RN visits could be up to 21 days apart due to COVID restricted facilities. If so, would home health aide supervision be acceptable at 21 days, or how would that be maintained?
Can you provide an update regarding telehealth face to face encounters?
Can you provide recommendations for hospice volunteer involvement in office versus patient contact.
Environment of Care and Life Safety
What should we expect during an onsite survey for EOC/Life Safety? If we have modifications due to the pandemic, how will that be scored?
We were notified that we will not have a Life Safety surveyor for this triennial survey. How will this change survey including the EM tabletop and EC/LS document review?
Infection Control
Hierarchical Approach

**Rules and Regulations**

**CoPs and CfCs**

**Manufacturers’ Instructions for Use**

**Evidence-Based Guidelines and National Standards**

**Consensus Documents**

**Organization’s Infection Prevention and Control Policy**

* For organizations that use Joint Commission accreditation for deemed status purposes or that are required by state regulation or directive, Conditions of Participation (CoPs) and/or Conditions for Coverage (CfCs) should be reviewed for applicable mandatory requirements.

**Must comply with these!**

**Mostly your choice as to which you follow.**
Deciding IP Practices During COVID 19

Organizations MUST follow these!

- Federal Mandate
- State mandate
- Local Mandate
- CMS requirement (if deemed)
- Instructions for Use

Other sources of information:
- Evidence based guidelines
- Consensus documents
Will you be able to provide a visit overview of a COVID-19/PUI patient at home?

Please also address proper bag technique when handling these cases.
What are the most common infection control shortcomings you have observed in surveys during the public health emergency?
Home Health Surveys: 1/1/20-12/6/21

Top 10 IC Findings

N=1,480 surveys with a total of 3,708 IC findings
Pre-Submitted Questions

What will surveyors look for pertaining to COVID and IC?

What, if any, specific infection control protocol changes have been made as we continue to function in the current pandemic?
What should be documented regarding a patient refusing to wear a mask while conducting the home visit?
Pre-Submitted Questions

Interested in how others are determining how to manage patients that test positive or are PUI. Do you require testing before removal of precautions? How long do you use precautions after a positive test?

What would you advise as a standard on when to discontinue full PPE for positive patients in the home?
Pre-Submitted Questions

RESPIRATORS:
- Should respirators be worn by clinicians when seeing patients at home?
- What is the status of requiring N-95 mask fitting when we may not be able to acquire the mask that was fitted?
- Are agencies providing fit testing to HHA/CNAs with the new OSHA ETS requirement? How are you doing this when you have a large number of HHAs/CNAs?

SCREENING:

Can you provide an update on the status in relation to CMS stance on "in person" temperature taking and question screening for staff?
RETURN TO WORK:

What is a general rule of thumb to let staff, caregivers, nurses, etc. return to work after being positive for COVID-19?

How long does a vaccinated person that gets COVID have to be off work?
PRODUCTS:

Does The Joint Commission have guidance regarding shortages in hand hygiene products, cleaning and disinfecting supplies?
Infection Prevention Resources

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

Interim Guidance for Implementing Home Care of People Not Requiring Hospitalization for Coronavirus Disease 2019 (COVID-19)

OSHA COVID-19 Vaccination and Testing; Emergency Temporary Standard: Fact Sheet:

OSHA ETS Rule:

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

How will The Joint Commission survey for a new vaccination mandate in which all health care organizations having proof that employees are vaccinated or were approved for an exemption? Which Infection Control/Leadership standards apply?
Are policies that support the temporary waivers expected by The Joint Commission?
Does the CMS temporary change under section 3708 of the CARES act, which allows a Medicare-eligible home health patient to be under the care of an NP or PA also cover/apply to Medicaid (under 21) patients?
Do you anticipate nurse practitioner signatures being accepted in the future as well?
Is remote home health aide supervisors going to be permanent?
Pre-Submitted Questions

What's the timeline on the 1135 CMS Waiver?

When will waivers end? What do I need to be ready for next survey?
Public Health Emergency (PHE) Extension

The Department of Health and Human Services released a statement on Friday, 10/15/21 stating the PHE was extended.

The renewal effective date is Monday, 10/18/21 and will last for 90 days.

The is the seventh extension of the PHE.

1135 Waivers will remain in effect during the declared PHE.
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.
Time for a few more questions
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.