COVID-19 Webinar for Home Care Accreditation

Q&A With The Joint Commission

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Panel

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Pre-Submitted Questions

Telehealth

What is the determining factor for use of telehealth visits, and how long will these visits continue to be utilized?

Can licensed vocational nurses do Telehealth or is it only for RNs?
Are we able to hold off on doing supervisory visits because of the pandemic which would result in less traffic going into the patient’s home?
Please relate referral system to home health, palliative and hospice for patients with COVID in intake processing.
Do you need a policy for patients that are COVID positive or rule out COVID to accept verbal consent vs. written consent on CMS/State forms that require written signature?
Can physical/occupational therapies do the start of care OASIS if nursing is also ordered?
Can you provide recommendations for hospice volunteer involvement in office versus patient contact?
Pre-Submitted Questions

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?
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?
Pre-Submitted Questions

What are common survey findings during the survey during COVID pandemic?

What are agencies’ most common deficiencies for 3-year surveys during this year 2021?
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 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.

- **Effective March 15, 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.
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

https://www.jointcommission.org/resources/research/operations-support-research/
Environment of Care and Life Safety
Pre-Submitted Questions

ILSMs for COVID-19 areas created for patients -- how long can we keep these ILSMs in place before having to make permanent changes? Examples (suites too large, both suite doors exiting through another suite, temporary exit signage)
What should we expect during onsite survey for EOC/LS? If we have modifications due to the pandemic, how will that be scored?
Hierarchical Approach

Must comply with these!

Mostly your choice as to which you follow.

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.
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
Infection Prevention Evidence-based Guidelines

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

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

Interim Guidance for Implementing Home Care of People Not Requiring Hospitalization for Coronavirus Disease 2019 (COVID-19)
What is the recommendation for hospice employees entering homes - surgical masks or N95s?
What is best practice for discontinuing PPE on COVID patients?
What is recommended use of PPE including donning and doffing in home environments and extreme weather (excessive cold or heat)?
Pre-Submitted Questions

How are agencies managing eye protection? We are encountering problems with fogging of goggles and shields.
If our governor lifted the emergency status and any mask or other restrictions will surveyors still be wearing masks and using social distancing?
Do we still use complete PPE during home visit when the clinician is already vaccinated?
Pre-Submitted Questions

Please provide specific infection control measures to educate us to be safe and in compliance.
What are the infection prevention practices specific to COVID-19 that you will be looking at during a scheduled survey?
Would agencies be required to have a log identifying cleaning/disinfecting schedule?
When do we report a patient that is COVID-19 infected, i.e., do we need to report to CDPH if patient was diagnosed with COVID-19 during hospitalization and past the 14 days since diagnosed?
Pre-Submitted Questions

Our policy is to disinfect clinical bags inside and out monthly or when visibly soiled. Is this acceptable during the pandemic? For a household with suspected or known COVID (and other infectious/contamination risks) we do not bring the bag in.
What is a general rule of thumb to let staff, caregivers, nurses, etc. return to work when exhibiting signs/symptoms of COVID-19?
Would Joint Commission request temperature logs for nurses and patients?
What kind of screening for staff and patients are you going to expect to see? If we have low community spread in our area and we have gone to self-attestation for staff, will that be held against us?
What is the compliant way to do person in-service and training on infection control in the office during this pandemic?
CMS 1135 Waivers
Once the pandemic ends, do the waivers end on the same day or is there a grace period to get back into compliance?
Pre-Submitted Questions

How are 1135 Waivers impacted and what do we need to present during survey?

How will the 1135 waivers be evaluated on survey?
When is this waiver expiring?
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.
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