COVID-19 Webinar for Behavioral Health Care and Human Services Accreditation

Q&A With The Joint Commission

August 31, 2021
Panel

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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

https://www.jointcommission.org/resources/research/operations-support-research/
If our agency is working remotely from home, how will surveys be conducted? Vaya health requested information and we had a few days to mail/email them with our records. Is this something The Joint Commission can do since COVID is rampant in our community?
Pre-Submitted Questions

We were due for our accreditation visit in July and have not heard from The Joint Commission. When can we expect our visit?
When an agency is surveyed will the survey examine the normal areas of care or be focused on COVID-19 mitigation strategies?
Are we supposed to indicate that some programs are technology-based on our application for programs temporarily providing Telehealth services during the pandemic?
Environment of Care, Life Safety and Emergency Management
Pre-Submitted Questions

What is the requirement for emergency drills for behavioral health facilities?

Emergency preparedness - Can the COVID-19 pandemic be used toward our annual drill exercise?
For outpatient behavioral health care, business occupancy (owned/leasing space): is the requirement one fire drill annually?
Infection Control
The Infection Prevention Hierarchy

- 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)

Other sources of information

- Evidence based guidelines
- Consensus documents

Instructions for Use

Other sources of information
What are some best practices around CPAP use and nebulizer treatments on adult and geriatric behavioral health units without the capacity for neg. pressure?

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

Please clarify the use of PPE for care of the COVID and non-COVID patient with and without AGP.


## What PPE Do I NEED to Wear?

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<tr>
<td>Yes</td>
<td>Yes</td>
<td>Any level</td>
<td>FFR (preferred), eye protection, gloves, gown</td>
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<td>FFR (preferred) or facemask, eye protection, gown, gloves</td>
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<td>Moderate or substantial</td>
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<td>FFR or facemask and eye protection *</td>
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<td>No/Unknown</td>
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<td>Minimal or Limited</td>
<td>Facemask*</td>
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* Additional PPE as required by Standard and Transmission based Precautions

**FFR**: Filtering Facepiece Respirator
Pre-Submitted Questions

What is The Joint Commission’s stand on behavioral health organizations having respiratory protection programs/fit-testing staff for respirators related to potential COVID-19 cases?

Resources:
OSHA Personal Protective Equipment Standard

OSHA Respiratory Protection Standard
Pre-Submitted Questions

Due to wipes still being difficult to obtain can an organization use wipes that do not specifically have ability to kill TB?

Resource:
Guidelines for Environmental Infection Control in Health-Care Facilities (2003)
https://www.cdc.gov/infectioncontrol/guidelines/environmental/background/services.html
Can you please address the challenge of cleaning and disinfecting soft toys that are essential in play therapy?

Resource:
Behavioral health inpatient double occupancy in the time of COVID - any additional infection control practices?

Resource:
Clinical Questions about COVID-19: Questions and Answers
Pre-Submitted Questions

I currently work in a behavioral health office with an IOP program. What are The Joint Commission’s recommendations in regard to wearing masks while in group sessions?

Are masks required in behavioral healthcare for adolescents in residential settings with the new rise in COVID variants?

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

Is there really a difference in the effectiveness of surgical mask vs. a cloth mask with a pocket for filter insert? I know the poster said cloth was not considered PPE. Why?

What type of masks should behavioral health staff be wearing around patients?

Resource:
Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic
Discuss mask requirements for non-vaccinated anxious patients - increases anxiety, hyperventilation occurs, respiratory compromise, potential cross contamination.

Resource:
Clinical Questions about COVID-19: Questions and Answers
Pre-Submitted Questions

What is the best practice for someone who gets COVID, quarantines for the 14 days, then on day 14 family member tests positive for COVID? (For a vaccinated person (showing symptoms) and for an unvaccinated person.)

Resource:
Updated Healthcare Infection Prevention and Control Recommendations in Response to COVID-19 Vaccination
There have been an increased number of cases where people diagnosed with COVID-19 are medically cleared and no longer contagious but who are still testing positive. Many facilities have policies that require a negative result to return to work.

**Resource:**
Return to Work Criteria for Healthcare Personnel with SARS-CoV-2 Infection (Interim Guidance)
Pre-Submitted Questions

Do we need to have patients fill out COVID questionnaires for each visit? Or do we rely on them telling us they were exposed?

Can we mandate patients to have the COVID-19 testing done?

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

Pre-Submitted Questions

Are there any specific requirements for documenting staff wellness checks, such as temp or symptoms related to COVID?

Is self monitoring for COVID okay for a health facility?

Resource:
Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic
https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html\
CMS 1135 Waivers
Pre-Submitted Questions

We are accredited under the hospital, but our population is psychiatric patients and we are non-deemed -- do the 1135 waivers apply to us even if we have our EOP activated as of last year?
Pre-Submitted Questions

Just for confirmation from prior presentations: Waivers will be null once an organization's EoC (Emergency Operations) has been shut down?
Is there an information link that can be shared about 1135 waivers?
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.
The Department of Health and Human Services released a statement on Monday, 07/19/21 stating the PHE was extended.

The renewal effective date is Tuesday 07/20/21 and will last for 90 days.

This is the sixth extension of the PHE.

1135 Waivers will remain in effect during the declared PHE.
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.