COVID-19 Webinar for Behavioral Health Care Accreditation

Q&A With The Joint Commission

August 27, 2020
Panel

Robert Campbell, PharmD  
Director, Clinical Standards Interpretation  
Hospital / Ambulatory Programs  
Director, Medication Management  
The Joint Commission

Sylvia Garcia-Houchins, MBA, RN, CIC  
Director, Infection Prevention and Control  
The Joint Commission

Ryan Kollereb, MBA, MPH  
Senior Account Executive  
The Joint Commission

Gayle Jensen-Savoie, PhD, LPC-S, LMFT-S, LCDC  
Field Director, Surveyor Management  
The Joint Commission

Herman A. McKenzie, MBA, CHSP  
Director of Engineering, Standards Interpretation Group (SIG)  
Division of Healthcare Improvement  
The Joint Commission

Maura Naddy, MS, RNC-OB  
Associate Director, Standards Interpretation  
The Joint Commission

Falguni Shah  
Associate Director Standards Interpretation Group Division of Healthcare Improvement  
The Joint Commission

Peter Vance  
Field Director  
Accreditation and Certification Operations  
The Joint Commission
Pre-Submitted Questions

How long will the 1135 waivers be active? Is there an end in sight at this time?
Pre-Submitted Questions

What level of specificity will surveyors be looking at in terms of documentation of response activities and communication to employees?
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.
Pre-Submitted Questions

There are times when we order 1:1 intervention for our high-risk patients. With the CDC guidance to social distance and maintain 6 ft distance while wearing a mask, what is your guidance regarding the 1:1 intervention?

What methods were utilized to do constant observation on a COVID positive patient- as the staff do not want to be in that room with the patient-particularly when they are receiving aerosolizing procedures?

What are approved modifications for 1:1 sitting for a patient who is high risk for suicide and positive for COVID-19?
Pre-Submitted Questions

Are there any recommendations for distancing for 1:1 observation on patients at risk for suicide and under suspicion or positive for COVID-19?
Pre-Submitted Questions

Can you address long term social distancing in behavioral health group living environments?
Pre-Submitted Questions

Does The Joint Commission have specific requirements around family therapy and documentation of family therapy sessions?
Pre-Submitted Questions

From the BHC Webinar: 1. If providing counseling via telehealth during COVID, will you accept verbal acknowledgement of treatment plans if clients are not coming in?

2. Can you explain the current Joint Commission virtual process related to policies due to COVID?
Pre-Submitted Questions

How does a hospital-based PHP/IOP program continue to serve patients virtually while the conditions of participation are in place?
Pre-Submitted Questions

How do we address change in census capacity due to COVID response? (supporting social distancing, etc.)
Pre-Submitted Questions

How will Joint Commission be measuring access to care for outpatient services during COVID-19 emergency and looking at a chart hx with patients who have no internet/technology access?
Pre-Submitted Questions

Using validated screening tools for suicide assessment: Do you consider the CAM tool that screens and assess, is the next piece acceptable?
Pre-Submitted Questions

What is The Joint Commission’s expectation around outcome measures during COVID?
The Joint Commission return to survey activity

- In addition to conducting accreditation surveys and certification reviews, we have been advocating for the safety and wellbeing of healthcare workers at the highest levels of policy making.
- We want to assure you that we want to work together to reduce your risk and ours during the onsite survey/review process.
Your questions

You have had a number of questions about our return to survey/review:
- How or when will we get a survey/review?
- What will that survey/review process look like, any differences?
- What type of instruction have you provided your surveyors/reviewers?
- What will the surveyors/reviewers focus on?
When and how will survey activity resume?

- Survey/review activity has started in low risk areas – includes all programs
- 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.
- In addition, your AE will contact you to determine your readiness.
- We are aware that surveys/reviews are past their due dates, CMS is also aware – we will conduct those surveys/reviews when we are able.
- 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 surveyors/reviewers?

- 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/review and follow the organizations guidelines. The organization will provide the PPE to the surveyor/reviewer as required by their policy.**
- Practice physical distancing
- Practice good hand hygiene
- Follow CDC guidelines
What has changed about the survey process?

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

- Limiting the number of individuals in group sessions
- The use of audio or videoconferencing could be incorporated to safely expand the number of attendees for sessions
- Use of masks will be a routine practice
- Maximize the use of technology to eliminate the number of people needed to sit directly next to an individual for an extended period of time. For example, screen sharing or projecting medical records
- Interviewing patients and staff by telephone
- Driving in separate cars to offsite or patient homes
Survey/ Review process - continued

- **We will NOT Enter** an at risk or confirmed COVID-19 homes or rooms.
- We will avoid visiting a unit with any confirmed COVID-19 patients when possible.
- Limited physical review of high risk and aerosol generating procedures
- Consider using a simulation and/or distant review of certain activities/procedures
- Practice social/physical distancing during the survey
- Follow “PPE” and risk reduction strategies as established by the CDC
- Limit attendance at group sessions e.g., opening, briefings, system tracers
- Limiting observers or scribes to avoid additional exposure during the survey
What will be the focus of survey activities?

- During the opening conference we will have 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

- Virtual surveys – early surveys and initial surveys have occurred in some programs (Hospital, Behavioral, Lab, Nursing Care Centers, Critical Access Hospitals and Home Care)

- Virtual 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
  - Initial surveys conducted virtually will have a follow up survey onsite.
  - Organization is contacted to verify ability and willingness to participate
COVID-19 resources

What Your Organization Needs to Know About the Coronavirus

Trusted Guidance. Trusted Resources.

View resources
Behavioral Health Care & Human Services
Live Virtual Event

Date: October 28-30, 2020
SKU: EDU2060
Price: $599.00

Who Should Attend? Any healthcare professional that is accredited by Joint Commission’s accreditation standards related to Behavioral Health Care & Human Services.

What Will You Learn? Program agenda and objectives in development TBD on website
Pre-Submitted Questions

- Is there any special guidance for mental health hospitals in implementation of face coverings, masking, social distancing and hand hygiene?

- CDC Clinical Questions about COVID-19: Questions and Answers (look in the Infection Control section)
- Pre-Submitted Questions

- What is the recommendation on providing masks for non-symptomatic patients in the acute psychiatric setting?
- Pre-Submitted Questions

- What sort of mask do inpatient units use for their mental health units? What about wearing masks in the office when people are hard of hearing or patients refuse to wear a mask?

- Are face shields an acceptable alternative to masks in a residential facility?
- Pre-Submitted Questions

- How do we improve compliance of inpatients on a behavioral unit with keeping their mask on?

- Do we need to document mask compliance for patients?
– Pre-Submitted Questions

– Are wireless procedure/surgical masks required for healthcare providers in behavioral health?
Pre-Submitted Questions

How can we guarantee that the established guidelines and protocols are complied with in order to avoid spread in our institution?
− Pre-Submitted Questions

− Any suggestions for handling the upcoming influenza season and differentiating flu from COVID in an inpatient behavioral health facility?
- Pre-Submitted Questions

- How should we handle employee refusals to get influenza vaccination or TB testing during the pandemic?
Pre-Submitted Questions

Please provide clarification about “high risk exposure” versus “low risk exposure” of staff who are wearing surgical masks when exposed to a Covid positive patient or staff member.

- Pre-Submitted Questions

- Can COVID-19 be transmitted from surfaces?
Pre-Submitted Questions

Must aerosol generating treatments be done in a negative pressure room?

Table B.1. Air changes/hour (ACH) and time required for airborne-contaminant removal by efficiency *

https://www.cdc.gov/infectioncontrol/guidelines/environmental/appendix/air.html
Pre-Submitted Questions

What is the best way to handle a client in a *residential* treatment center that tests positive for COVID when they are in a shared room situation with no open room for quarantine?
− Pre-Submitted Questions

How should any suspected psychiatric patient be roomed in an ED until results are confirmed to rule out COVID-19?
Pre-Submitted Questions

While CDC has said that we can reuse N-95 respirators as a crisis strategy, face shields are also difficult to get. If they are not labeled as reusable, can we reuse them if they are disinfected between uses? Can they be reused by more than one employee?

− Pre-Submitted Questions

Our interpretation of OSHA regulations regarding respirators is that we are required to have a medical evaluation and fit test all staff who must wear them. Can TJC share what they know about the medical evaluation and fit test? Are there situations were these requirements would not apply?

OSHA: Small Entity Compliance Guide for the Respiratory Protection Standard
Pre-Submitted Questions

After testing positive for COVID-19, when is it appropriate for a health care professional to return to the workplace?

Pre-Submitted Questions

There have been an increased number of cases where people diagnosed with COVID-19 are medically cleared and deemed no longer contagious but who are still testing positive. Many facilities have policies that require a negative result to return to work.

− Pre-Submitted Questions

For outpatient mental healthcare facilities, are we required to take temperatures and ask screening questions of all clients and/or staff prior to entering the building?

If so, how long should we keep daily COVID-19 screening questionnaires?
Pre-Submitted Questions

How will Hospital (specifically free-standing psychiatric hospital’s) Ligature Risk Extension project completion re-surveys be prioritized when survey activities are re-instated?
Pre-Submitted Questions

Is there a waiver for compliance with scheduled drills that were not able to be undertaken due to COVID related staff changes, office closures, and distancing protocols?
Pre-Submitted Questions

Life Safety Compliance. What if we are unable to get vendors to do our life safety inspections?
Pre-Submitted Questions

The rapid development of COVID-19 related changes to protocols, processes happened in March-April 2020. What are the best tools for a Behavioral Health hospital to use to demonstrate its response to interim life safety, emergency operations, blanket waivers, etc.?
Thank You

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

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

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