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

Q&A With The Joint Commission

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Panel

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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. We will continue to connect with Behavioral HealthCare and Human Services organizations for their interest in pursuing the offsite option and re-evaluate on a monthly basis.
- 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 hospital 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 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.
• 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
- Most hospital offsite events will have a follow-up onsite 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

• What is the process for getting an additional service accredited?
• For onsite surveys, should staff/surveyors be vaccinated?
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/
CMS 1135
Waivers
Pre-Submitted Questions

Are waivers still good and through when?
The Department of Health and Human Services released a statement on Thursday, 01/07/21 stating the PHE was extended.

The renewal effective date is Thursday 01/21/21 and will last for 90 days.

This is the fourth extension of the PHE.

1135 Waivers will remain in effect during the declared PHE.
Pre-Submitted Questions

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

Are there any 1135 waivers for restraint and seclusion?
Can you explain the process of determining if the 1135 waiver actually applies to your facility?
What are the expectations of CMS/Joint Commission documentation for facility response measures to the pandemic?
If there is a Joint Commission waiver and a CMS blanket waiver, which one does a deemed hospital follow?
Please discuss Joint Commission and CMS expectations regarding 1135 blanket waiver and the hospital's Emergency Operations Plan. Should the hospital being under its EOP to validate the use of the blanket waivers? On survey would this be a finding if both are not used?
What is The Joint Commission and CMS stance regarding outstanding Med/Def surveys? What do you anticipate?
Environment of Care and Life Safety
Do dryers need their lint traps cleaned 4 times a year?
Fire drills/emergency drills: folks are working from home. Will there still be a requirement to complete fire drills?
If a hospital has activated incident command for the pandemic and looking to use this as an EM "event" but the activation runs through the new year, how would you recommend using the activation as an event even though the event has not stopped?
Is a separate behavior health risk assessment required or will behavioral health inclusion in the facility-wide RA be required?
Pre-Submitted Questions

What is the current expectation under COVID for inpatient unit fire drills involving building evacuation? What about drills on different shifts?
What are the specific changes in Joint Commission standards in life safety over the past year and moving through 2022?

There have been multiple changes that are in the pre-publication standards on the Joint Commission website.

Below is the link.
Pre-Submitted Questions – Telehealth

• Are we supposed to indicate that some programs are technology-based on our application for programs temporarily providing telehealth services during the pandemic?
• What term does The Joint Commission use – telemedicine or telehealth? Which one is correct when describing the service? What is the difference?
• Telehealth allowances and regulations pre- and post- pandemic
• Telehealth standards and practices
• What are the particulars of telehealth programming that an organization should ensure are in place?
• If providing counseling via telehealth during COVID, will you accept verbal acknowledgement of treatment plans if clients are not coming in?
Can you explain the current Joint Commission requirement related to policies due to COVID?

We have lots of checklists that we do weekly, monthly such as checking our AED, refrigerator temperatures, etc. Many of our sites have been uninhabited as we have been working remotely therefore numerous internal audits and records are incomplete.
Curious about COVID-19 and group therapy. Are there any new requirements we need to meet? Or implement?
What can we do to help our colleagues who work in mental health and are struggling with mental illness?

What are some best practices about communal dining on inpatient psychiatric units during COVID-19 pandemic?

I am interested in changes needed to manage patients in both inpatient and outpatient behavioral health.
Information for Behavioral Health Organizations

Behavioral Health Care and Human Services — New Resources Added, February 23, 2021

Behavioral health care and human services specific resources:

**Note:** For resources regarding Telehealth, please see the Staffing and Telehealth section.

**Joint Commission Webinars**

- preparation for Behavioral Health Organizations for Coronavirus
- Preparing Behavioral Health Organizations for Coronavirus ([oral presentation in Spanish](#)), Preparación de organizaciones de salud mental para el coronavirus ([la presentación oral está en español](#))

In the following webinar, leaders from The Joint Commission answer questions on topics including infection prevention and control, environment of care/life safety, CMS 1135 waivers and Joint Commission standards.

- [COVID-19 Q&A Webinar for Behavioral Health Care](#) with The Joint Commission
- [Additional Q&A](#)
Infection Control
Does The Joint Commission have specific requirements for COVID-19 management?

The Joint Commission Perspectives, April 2019
Is a pandemic emergency plan going to be a new expectation of an update to the Infection Control Policy?
Pre-Submitted Questions

Has The Joint Commission changed any Infection Control standards due to COVID-19?
Pre-Submitted Questions

Are patients required to wear a mask in the behavioral health setting?

Resources:
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
If we require patients to wear a mask, how can we help to increase patient compliance? What if they refuse to wear a mask?

Resource:
CMS COVID-19 Infection Control for Psychiatric and Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID)
Can organizations require that all persons in the home wear a mask during home care visits?
Pre-Submitted Questions

What type of mask should behavioral health staff wear when sharing space or interacting with patients?

Resource:
Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic
What PPE is used for the care of COVID positive and COVID negative patients during routine care and in the presence of aerosol generating procedures?

Resource:
Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic
Can we extend the use of isolation gowns that are worn by healthcare workers performing COVID-19 testing?

**Resource:**
Strategies for Optimizing the Supply of Isolation Gowns
Pre-Submitted Questions

What are the guidelines for reprocessing N95 respirators or other PPE?

Resources:
Optimize N95 Respirator Supplies

FDA Emergency Use Authorization
If staff are allergic to hospital approved PPE, are they allowed to provide their own PPE?

**Resources:**
OSHA COVID-19 Control and Prevention
https://www.osha.gov/coronavirus/control-prevention#ppe_considerations

FDA Personal Protective Equipment for Infection Control
Pre-Submitted Questions

Are hospitals required to audit PPE donning and doffing techniques and compliance?
Where can I find recommendations for management of behavioral health patients during COVID-19, including social distancing, utilization of shared spaces, shared patient rooms, and provision of group therapy?

**Resources:**

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

Pre-Submitted Questions

Does testing patients for COVID-19 eliminate the need for the patient to wear a mask?

Resource:
CDC Test for Current Infection (Viral Test)
Can a person have a positive COVID-19 test result without being actively infectious?

Resource:
Should participants arriving for a 3-day inpatient detox program have COVID results before being admitted?
In a group home setting for youths, should new clients be quarantined upon arrival, and should they be quarantined when they return from a home visit?
What are the criteria for accepting a COVID-19 positive patient from the hospital and the home setting?

Resources:
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
What are the recommendations for treating a COVID-19 positive patient in the inpatient setting if they have no symptoms?
Is documentation of contact tracing required for employees who work in the behavioral health setting and report a positive COVID-19 test result?
While disinfectant supplies are limited, is it appropriate for organizations to utilize disinfectants that are effective against targeted organisms found in the healthcare environment, but may not be effective against TB?

Resources:
OSHA Bloodborne Pathogen Standards

EPA Frequent Questions about Disinfectants and Coronavirus (COVID-19)
Pre-Submitted Questions

Is hand sanitizer an acceptable alternative for use as a surface disinfectant for touch points in the behavioral health setting?

Resource:
Pre-Submitted Questions

Should healthcare organizations approach COVID-19 vaccination the same as Influenza vaccination by creating a plan, setting goals, allocating resources and tracking compliance?
How can we determine when it is appropriate to allow guests on our campus again?

Resource:
Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic
How should the lab approach social distancing recommendations if the physical layout was not designed to allow the proper amount of separation?

Resource:
Guidance for General Laboratory Safety Practices during the COVID-19 Pandemic
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.