



Webinar 2: Furthering Facility Compliance Information About the Pandemic April 2-13

April 14, 2020 1:00 pm

Presented by

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Evaluate Readiness

Coronavirus Disease 2019 (COVID-19) Preparedness Checklist for Nursing Homes and other Long-Term Care Settings



- ▶ Prepare to care for residents with COVID-19
- ▶ Evaluate current readiness and develop a COVID-19 plan that addresses communications, supplies, resident management, visitors, occupational health, training, and surge capacity.
- ▶ Infection Control Risk Assessment

https://www.cdc.gov/coronavirus/2019-ncov/downloads/novel-coronavirus-2019-Nursing-Homes-Preparedness-Checklist_3_13.pdf

First Responders

Communicate changes to the facility and policies/procedures that impact first responders



Operating Rooms

Concerns that positive pressure operating rooms would spread coronavirus to the rest of the OR. Should they be changed to negative pressure?

- ▶ ASHE recommends that health care organizations perform surgeries and other procedures on COVID-19 positive patients following the same guidelines for active TB patients:
 - ▶ Only medically necessary surgeries
 - ▶ Schedule and perform “after hours” or when there are no non-COVID-19 positive patients in the suite



Operating Rooms

- ▶ Develop a dedicated COVID-19 operating room and procedure room
- ▶ Minimize the amount of equipment and supplies in room
- ▶ Minimize staff in the operating or procedure room and all staff involved should wear N95 respirators.
- ▶ Keep doors closed as much as possible.
 - ▶ Assign a runner outside of the room who will retrieve medications, instrumentation and other supplies



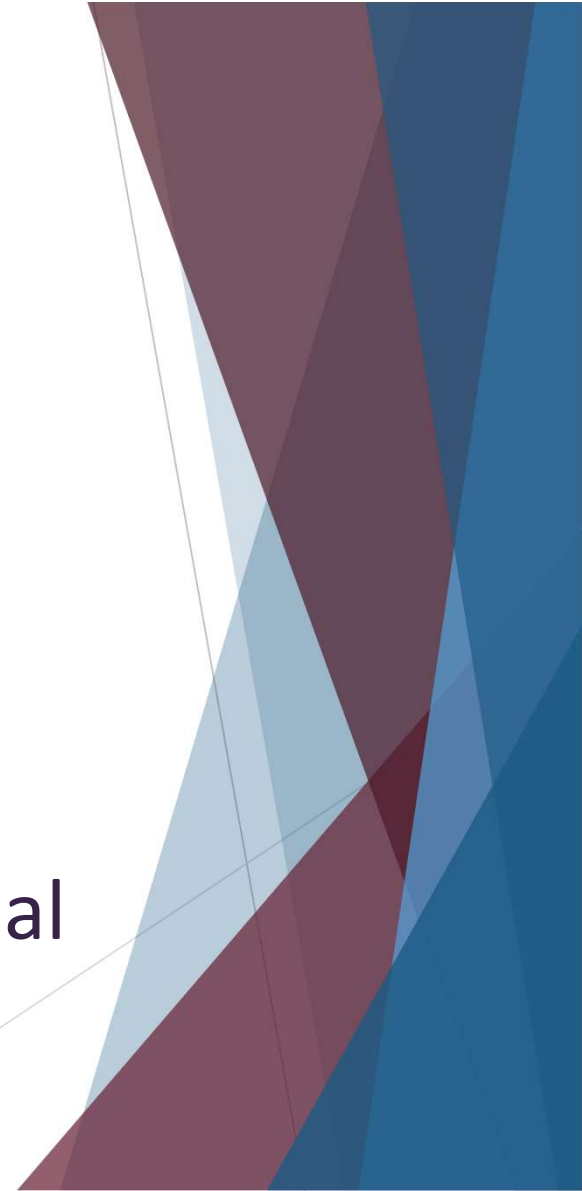
Operating Rooms

- ▶ Perform intubation and extubation in an Airborne Infection Isolation Room.
- ▶ Terminally Clean after the necessary number of air changes has occurred
- ▶ If negative pressure is desired for OR's and procedure rooms
 - ▶ Leave the room ventilation positive pressure
 - ▶ Use a negative pressure anteroom with separate entrance between operating or procedure room and main hallway
 - ▶ Anteroom can be used for donning and doffing PPE for supplies that are needed after case begins



Wisconsin Rule Changes

Department of Safety and Professional
Services (DSPS)



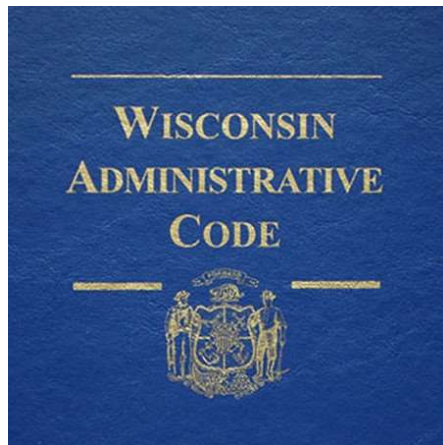


Wisconsin Rule Suspension

What you Do and Do Not Have to Do

DHS Administrative Rule Suspensions & Order

Emergency Order #21 Department of Health Services
Issued April 3, 2020



Adjustments to Certain Administrative Codes

DHS Administrative Rule Suspensions & Order

Nursing Homes DHS 132.44(1)(a)

Orientation program for employees. Removed some requirements.
Must still:

- ▶ Before performing any duties, new employees, including temporary help
 - ▶ Trained on fire prevention, accident prevention, and emergency procedures
 - ▶ Trained on their responsibilities

DHS Administrative Rule Suspensions & Order

CBRF's DHS 83.47(2)(d) & (e)



Fire drill and other
evacuation drill
requirements are
suspended.



Federal Waivers

1135 Blanket Waivers



Caution Regarding Waivers

Avoid applying for 1135 Waiver for LSC requirements

- ▶ “Section 1135 of the Social Security Act has seven topical areas that fall under the scope of this section of the Act, and the LSC is not one of them”

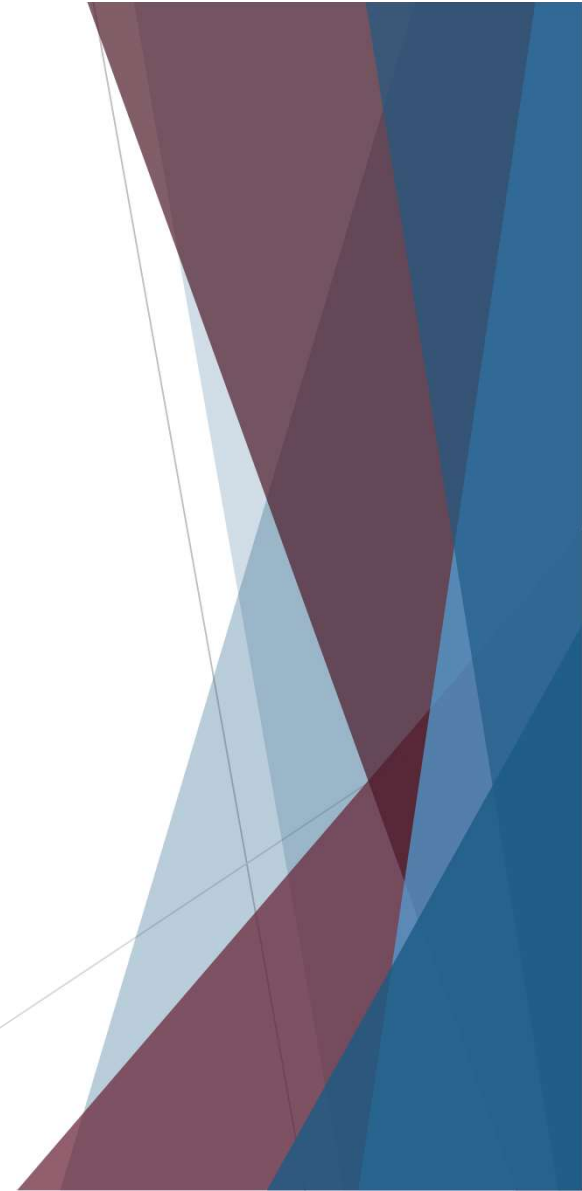
https://www.ssa.gov/OP_Home/ssact/title11/1135.htm

- ▶ Legal Concerns

"If my client was in any way compromised I would ask for their protocols and then I would depose everyone I could find looking for examples where the protocols were not followed. Then I'd hire an expert to pick apart their protocols for any deficiencies. I only need one point of failure if I'm the plaintiff's attorney; either bad protocols or failure to follow those protocols are enough."

Federal Waivers

Additional 1135 Blanket Waivers



New 1135 Blanket Waivers

CMS - COVID-19 Emergency Declaration Blanket Waivers for Health Care Providers

These waivers have a retroactive effective date of **March 1, 2020** and end no later than when the emergency declaration is ended.

Must not conflict with state requirements

- See April 6, 2020 DQA Memo 20-002 for information on conflicts

<https://www.cms.gov/files/document/summary-covid-19-emergency-declaration-waivers.pdf>

Offsite Screening

Requirement Waived: Emergency Medical Treatment & Labor Act (EMTALA) Section 1867(a)

Hospitals, psychiatric hospitals, and critical access hospitals (CAHs) may screen patients at a offsite location



Long-Term Care Facilities

Requirements Waived: 42 CFR 483.90

In emergencies and situations needed to help with surge capacity can use other rooms for beds and residents for resident care

- ▶ Activity rooms
- ▶ Meeting/conference rooms
- ▶ Dining rooms
- ▶ Or other rooms



- ▶ Residents must be kept safe and comfortable
- ▶ Must meet other applicable conditions of participation

Skilled Nursing Facility Buildings

Requirement Waived: 42 CFR 483.90

- ▶ Non-Skilled Nursing Facility building may be temporarily certified and used if needed for isolation of COVID-19 positive residents
- ▶ State must approve location
- ▶ Must provide for safety and comfort of patients and staff
- ▶ Ensures care and services are still available while protecting other vulnerable adults
- ▶ Increases availability of inpatient care beds at hospitals for the most critical patients but still provide beds others needing care

Critical Access Hospitals

Requirements Waived: 42 CFR § 485.610(b) & §485.610(e)

Allows flexibility in establishing temporary off-site locations

- ▶ Do not need to be located in a rural area or an area being treated as being rural
- ▶ Do not need to be at least 35 miles from another hospital



Hospitals, Psychiatric Hospitals, and Critical Access Hospitals

Requirements Waived: 42 CFR 482.41, §485.623, and §413.65

- ▶ Permits non-hospital buildings/space to be used for patient care and quarantine sites
- ▶ The location approved by the state
- ▶ Must provide for the safety and comfort of patients and staff
- ▶ Must meet the requirements in effect during a Public Health Emergency
- ▶ This allows for increased capacity and separation of patients

<https://www.cms.gov/files/document/summary-covid-19-emergency-declaration-waivers.pdf>

Alternative Care Sites

Requirements Waived: 42 CFR §482.41 and §485.623

Permit non-hospital buildings/space to be used for patient care and quarantine sites

- ▶ Location must be approved by the state
- ▶ Allows for increased capacity and promotes dedicated areas for COVID-19 patients.



CMS - COVID-19 Emergency Declaration Blanket Waivers for Health Care Providers

Alternative Care Site Requirements

Requirements Waived: 42 CFR §482.15(b) and §485.625(b), §482.15(c)(1)–(5) and §485.625(c)(1)–(5)

- ▶ Hospitals and CAHs do not need emergency preparedness policies and procedures or specific contact information in communication plans for their Alternative Care Sites.
 - ▶ Do not need specific contact information for staff, organizations providing services under arrangement, patients' physicians, other hospitals and CAHs, and volunteers



Alternate Care Sites

Licensure Requirements

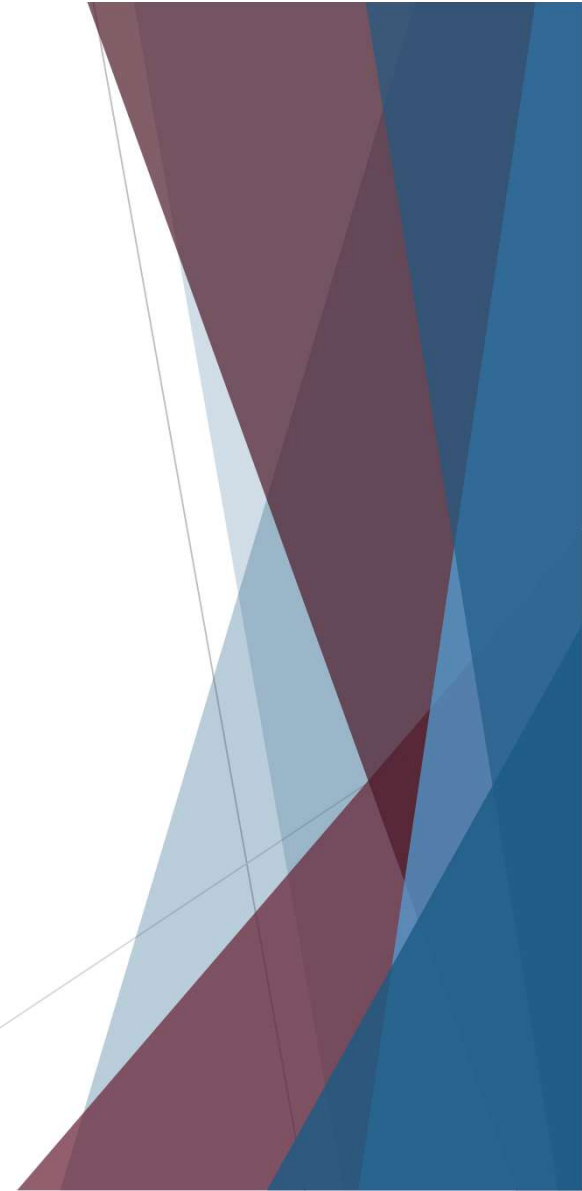
DQA Memo 20-001

Issued April 3, 2020

<https://www.dhs.wisconsin.gov/dqa/memos/20-001.pdf>

3 Options for Increasing the Available Beds

- ▶ Option 1: Expansion within a Hospital
- ▶ Option 2: Expansion on Campus
- ▶ Option 3: Expansion Off Campus



All Options - Physical Environment

- ▶ The physical environment requirements per Life Safety Code and DHS 124 subchapter V
- ▶ Features of the physical environment that don't meet hospital requirements
 - ▶ Submit an interim life safety plan to Henry.Kosarzycki@wi.gov.
 - ▶ Explain how the expansion will safeguard patients, staff and others in accordance with the expectations of NFPA 101 2012 ed. with regards to Goals, Objectives and Fundamental Requirements as described under Chapter 4.



Alternate Care Sites

Considerations for Choosing a ACS

CDC Considerations for Selection of Alternate Care Sites

- ▶ Layout plan for all areas of the facility considering the type of personal protective equipment (PPE) that should be worn in each area
- ▶ Determine maximum number of patients in the facility
- ▶ Plan for safe spacing between patients
- ▶ Functional HVAC (heating and cooling) system

https://www.cdc.gov/coronavirus/2019-ncov/hcp/alternative-care-sites.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fhealthcare-facilities%2Falternative-care-sites.html

Areas Needed

- ▶ Patient triage
- ▶ Patient care area or rooms with access to patient bathrooms/shower areas
- ▶ Charting area
- ▶ Clean storage - medications and clean supplies such as linen and PPE, ideally with a refrigerated section for certain medications
- ▶ Medication preparation area
- ▶ Dirty storage would have space for medical and non-medical waste and dirty equipment waiting to be reprocessed
- ▶ Are pharmacy and diagnostics needed



Staff Areas

- ▶ Staff only breakroom with a bathroom and space to store personal belongings
- ▶ Area where staff can eat without wearing PPE
- ▶ Area for staff to put on and remove PPE



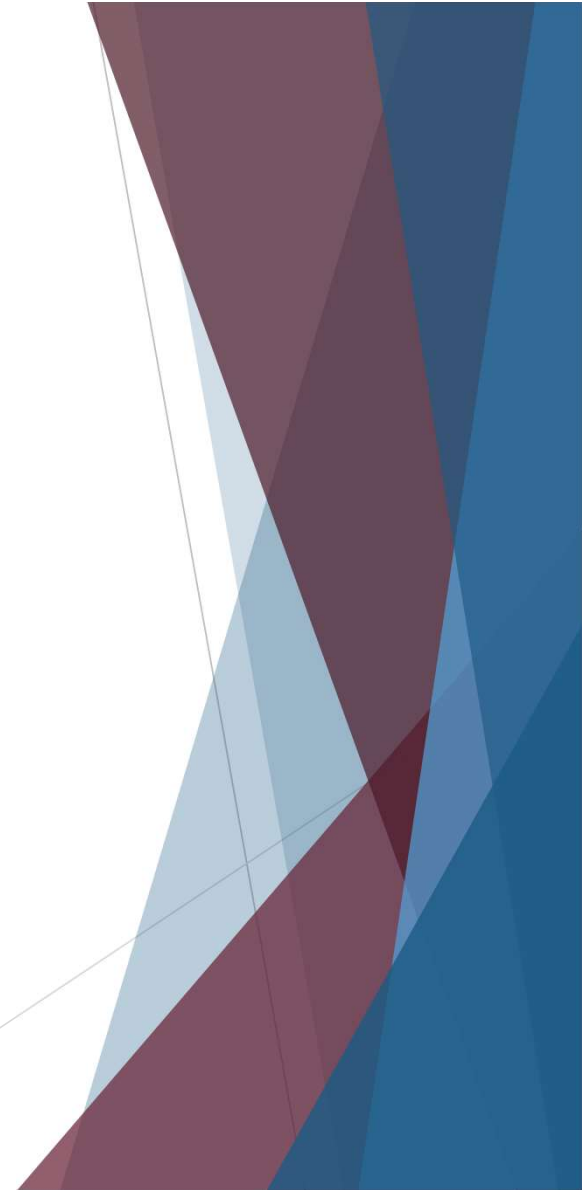
Dietary Needs

- ▶ Food services
- ▶ Catering provided with disposable plates/utensils



Cleaning

- ▶ Cleanable floors and surfaces
 - ▶ Avoid porous surfaces such as upholstered furniture, carpet, and rugs as much as possible
- ▶ Employees performing Environmental Services duties
 - ▶ Trained
 - ▶ Have necessary training and appropriate PPE for exposure to disinfectants and patients with COVID-19
 - ▶ Use EPA-registered disinfectants according to label instructions for routine cleaning and disinfection
- ▶ Protocols are in place for cleaning spills of blood or other body fluids



Personal Care and Hygiene

- ▶ Adequate sinks for hand hygiene
- ▶ Adequate numbers of toilets, including a separate toilet for staff
- ▶ Adequate shower facilities
- ▶ An appropriate supply of bedside commodes, urinals, and personal hygiene supplies (soap, toothpaste)



Considerations Based on Layout Used

- ▶ Alternate Care Sites with individual patient rooms
 - ▶ Hotel
- ▶ Alternate Care Sites with open floor plan
 - ▶ Gymnasiums
 - ▶ Convention Halls
 - ▶ Gov. Evers Announces Construction of Alternative Care Facility at Wisconsin State Fair Park and Alliant Energy Center





NFPA

Compliance Recommendations



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