



COMPLIANCE CONSULTING
GROUP, LLC

Memorandum

May 21, 2020

On May 18, 2020, the Centers for Medicare & Medicaid Services (CMS) announced new guidance for state and local officials to assist in the safe reopening of nursing homes across the country. In a memo to state officials across the country, CMS detailed critical steps nursing homes should take prior to relaxing the restrictions implemented to prevent the spread of coronavirus disease 2019 (COVID-19).

Specifically, CMS addressed:

- Criteria for relaxing restrictions and mitigating the risk of resurgence;
- Visitation and Service Considerations; and
- Restoration of Survey Activities.

CMS further recommended that nursing homes not advance through any phases of reopening or relax any restrictions until facilities have met or exceeded specific benchmarks identified by individual state governments, with contributions from state and local departments of health, individual facilities, and other stakeholders. Specific criteria suggested by CMS include:

- a baseline test for all residents and staff, with appropriate actions taken based on the results,
- a state survey of those nursing homes that experienced a significant COVID-19 outbreak to ensure the facility has developed adequate controls for preventing transmission, and
- the establishment of the highest level of mitigation while the facility's local community is in Phase 1 of Opening Up America Again.

For more information on specific requirements, please refer to Attachment 1 – Recommended Nursing Home Phased Reopening for States in the CMS memo.

We are always available to discuss your concerns:
(718) 408-8989 | www.ComplianceCG.com