



COMPLIANCE CONSULTING
GROUP, LLC

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Memorandum



As we follow the developments related to the spread of COVID-19 (Coronavirus), we advise you to review the items listed below and make sure that all required activities and documentation related to your facility's Infection Control and Prevention Program (IPCP) are current and complete.

A. Your facility must have an IPCP comprised of written standards, policies, and procedures, including:

- a. A system to identify possible communicable diseases or infections before they spread to other individuals;
- b. Protocols on when and to whom possible incidents of communicable disease or infection should be reported;
- c. Precautions to be followed to prevent the spread of infections;
- d. Details on when and how isolation should be used for a resident;
- e. The circumstances under which an employee is prohibited from direct contact with residents or their food; and
- f. The hand hygiene procedures to be followed by staff involved in direct resident contact.

B. The IPCP must be reviewed annually and updated as necessary.

C. Infection control is a required annual training topic for facility staff.

D. Your facility must have at least one person designated as an Infection Preventionist (IP). The IP must:

- a. Have primary professional training in nursing, medical technology, microbiology, epidemiology, or other related field;
- b. Be qualified by education, training, experience or certification;
- c. Work at least part-time at the facility; and
- d. Have completed specialized training in infection prevention and control.
- e. Participate in, and report to, the Quality Assessment and Assurance (QAPI) Committee.

BASED ON THE REQUIREMENTS LISTED ABOVE, THE FOLLOWING ACTION STEPS SHOULD BE TAKEN:

1. **REVIEW** your facility's **TRAINING AND IN-SERVICE PROGRAM** to ensure infection control is included in all annual trainings and that staff have received training within the last year.
2. **REVIEW** your facility's **INFECTION PREVENTION AND CONTROL DOCUMENTS** to ensure they are current. Document the date and individuals conducting the review.
3. **REVIEW** your facility's **DOCUMENTATION AND QUALIFICATIONS** regarding the

Infection Preventionist. If you have not already done so, the attached form (Designation of Infection Preventionist) can be used to document the designation. The CDC has an IP training course available online which will fulfill the specialized IP training requirement: <https://www.cdc.gov/longtermcare/training.html>.

4. **REVIEW** your facility's **QAPI PROGRAM** to ensure the Infection Preventionist is on the QAPI committee.