



COMPLIANCE CONSULTING
GROUP, LLC

Memorandum

April 3, 2020

As the COVID-19 pandemic continues to move throughout the United States, concerns grow regarding the spread of coronavirus in nursing homes. The risks of the spread of infection are significant, given the vulnerability of many residents as well as the number of people both living in the facility and coming into and out of the facility. In light of these concerns, yesterday evening the Centers for Medicare & Medicaid Services (CMS), in consultation with the Centers for Disease Control and Prevention (CDC) issued new critical recommendations to state and local governments, as well as nursing homes, to help mitigate the spread of COVID-19 in nursing homes. The recommendations build on and strengthen recent guidance from CMS and CDC related to effective implementation of longstanding infection control procedures.

Specifically, CMS recommends the following:

- ✓ Nursing homes should immediately confirm and ensure they are complying with CMS and CDC guidance related to infection control.
- ✓ State and local governments should consider the needs of long term care facilities with respect to supplies of personal protective equipment (PPE) and COVID-19 tests.
- ✓ Previous guidance had advised nursing homes to restrict all but the most urgent visitors and staff and to provide temperature screening for staff. CMS now recommends that nursing homes immediately implement symptom screening for all staff, residents, and visitors – including temperature checks.
- ✓ CMS, in conjunction with CDC, had issued guidance on extending the use of PPE, when necessary. CMS now recommends that nursing homes ensure that all staff are using appropriate PPE when they interact with patients and residents, to the extent that PPE is available and per CDC guidance on conservation of PPE.
- ✓ To the best of their ability and working with state and local leaders, facilities should use separate staffing teams for residents, and, ideally, separate facilities or units within a facility to separate COVID-19 negative residents from those who have tested positive or are of unknown status.

CMS realizes the risks of COVID-19 in nursing homes and is encouraging facilities to consider new or innovative ways to stop the spread of the virus. As always, all infection control activities in your facility should be documented.

We are always available to discuss your concerns:
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