

**Discuss** Describe List Discuss **Discuss** Describe unique List factors Discuss contributing nursing home infection components complex prevention to infections of a LTCF demographics challenges in the infection associated with elderly control **LTCFs** program SPICE

Figure 20. Percent distribution of post-acute and long-term care services users, by sector and age group: United States, 2017 and 2018

Long-term Care Environment

➤ Long-term care (LTC) generally
refers to the large range of facilities

that provide care to individual(s) unable to achieve independent self

- or assisted care:

  Nursing home
- ➤ Skilled nursing and
- > Assisted living facilities
- > Encompasses medical, physical, and psychosocial care
- > Typically serve as the resident's

# SPICE SPICE

# **Nursing Home Demographics**

- Number of nursing homes: 15,600 (2018)
- Proportion of nursing homes with forprofit ownership: 70.0% (2018)
- Number of licensed beds: 1.7 million (2018)
- Number of residents: 1.3 million (2017)

https://www.cdc.gov/nchs/data/series/sr\_03/sr03-047.pdf

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# Nursing Homes Changed significantly over the past several decades Government regulation and consumer pressure Highly regulated Increased acuity of residents

- Medical needs more

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complex

"The problem is that nursing homes still operate on antiquated assumptions made decades ago about the complexity of care their residents require. Previously, older adults populated nursing homes primarily for custodial care and needed little in the way of medical intervention.

Scientific advances have introduced treatments for illnesses that previously were synonymous with death but now can be managed with medicine and therapies.

As a result, those who wind up in nursing homes—many after typically brief hospital stays—are extraordinarily frail, with multiple underlying conditions that demand elaborate medication regimens. '

"there is a notable rise in young patients bringing unique challenges. They are disabled by neurological disorders, trauma, or drug abuse, some have myriad afflictions from birth. younger adults are estimated to be the fastest-growing subpopulation in post-acute and long-term care, increasing to 16.5 percent in 2016."

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# · LTC is no longer synonymous with "geriatric care" · Adults aged 31-64 years fastest growing population · Require different approaches in care https://paltc.org/product-store/younger-adult-long-term-care-setting SPICE

YOUNGER ADULT IN LTC

### Describe **Discuss** List List factors Discuss Describe Discuss nursing home unique contributing components complex infection to infections of a LTCF demographics prevention in the infection challenges elderly control associated program with LTCFs SPICE

**INFECTION PREVENTION PROGRAMS** 

- ➤ Infection Prevention and Control (IPC) programs are inadequately staffed, as much as four-fold less than their acute care hospital counterparts
- > IPs wear multiple hats
- > Less than 10% have specialized
- > Difference in social environment
- Populations in LTCFs are heterogeneous

Council of State and Territorial Epidemiologists (CSTE): Recommendations for Surveillance and Reporting of Healthcare-Associated Infections in Long Term Care

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IP spend less

their time on

IP work; only

less than 10%

are certified

...3/29/23

40% have

specialized training; and

than a third of

10

# **INFECTION PREVENTIONIST**

- · Virtual audience:
  - Pease put into the chat box how many other roles you are responsible for
  - Please put in the chat box how long you have been in the role of IP
- · In-person-

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- Show of hands

**STAFFING** 

· CMS Final Rule: ""Medicare and Medicaid Programs; Minimum Staffing Standards for Long-Term Care **Facilities and Medicaid Institutional Payment** Transparency Reporting".

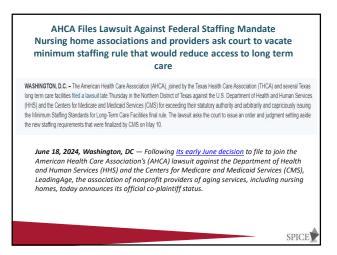
This final rule establishes minimum staffing standards for long-term care facilities, as part f the Biden-Harris Administration's nursing home reform initiative to ensure safe and quality care in long-term care facilities. Effective date: June 21, 2024

Implementation: Tiered but Facility Assessment for all must be implemented by August 8, 2024

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**Core Staffing Proposals** 

- 1. Minimum nurse staffing standards of 0.55 hours per resident day (HPRD) for RNs and 2.45 HPRD for Nurses Aides (NAs);
- 2. Requirement to have an RN onsite 24 hours a day, seven days a week; and
- 3. Enhanced Facility Assessment

Includes staggered implementation schedule and possible  $hard ship\ exemption$ 

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13

# **Timeline-Non-rural Facilities** Require facilities comply with facility assessment requirements 60 days after publication of final rule Require facilities to comply with RN onsite 24/7 two 2 years after publication date of final rule Require facilities to comply with minimum staffing requirement three years after publication of final rule SPICE

**Timeline-Rural Facilities** Require facilities comply with facility assessment requirements 60 days after publication of final rule

> Require facilities to comply with RN onsite 24/7 three years after publication date of final rule

Require facilities to comply with minimum staffing requirement five years after publication of final rule

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15

16

14

# **Permitting Regulatory Flexibility**

- · LTC facilities may qualify for a temporary hardship exemption from the minimum nurse staffing HPRD standards only if they are able to meet specific criteria demonstrating the following:

  - Workforce unavailability based on location
  - Demonstrate good faith efforts to hire and retain staff
  - A financial commitment to staffing
- CMS officials are

looking to finalize the nursing home minimum staffing proposal in 2024

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# **Takeaway Points**

- Among all nursing facilities, fewer than 1 in 5 could currently meet the required number of hours for registered nurses and nurse aides, which means over 80% of facilities would need to hire nursing staff.
- 90% of for-profit facilities would need to hire additional nursing staff compared with 60% of non-profit and government facilities.
- The percentage of nursing facilities that would meet the requirements in the proposed rule varies from all in Alaska (100%) to nearly none in Louisiana (1%).

https://www.kff.org/medicaid/issue-brief/what-share-of-nursing-facilities-might-meetposed-new-requirements-for-nursing-staff-hours/

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17

# INFECTION PREVENTION **CHALLENGES**

- Never been required to deal with emerging infectious diseases
- Regulatory oversight -Isolation should be the least restrictive possible
  - PPE used much less frequently



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- Education/monitoring absent or inadequate

homes have enough funding to address IPC concerns, study authors said. A  $\underline{\text{major part}}$  of the struggle for providers is the  $\underline{\text{ongoing staffing shortage}}$  — IPC measures can be labor-intensive and time-consuming. Vaccine hesitancy among both staff and residents contributed to high infection Supply chain issues "Policies should ensure ongoing preparedness and oversight that supports NHs organizational readiness to deal with future pandemics." "This includes *support* for facility renovations, education and IPC resources such as PPE supplies, testing kits, vaccinations, and other supplies. Additionally, there's a need for innovative approaches to recruit and support the NH workforce."

The results indicated a need for more clinical guidelines and public policies

 $\ \, {\rm designed} \,\, {\rm to} \,\, {\rm bolster} \,\, {\rm providers'} \,\, {\rm limited} \,\, {\rm resources} - {\rm including} \,\, {\rm ensuring} \,\, {\rm that} \,\, {\rm nursing}$ 

Conclusions and Implications: Our findings indicate that nursing homes may need more resources to prevent citations for infection prevention and control.

https://www.jamda.com/action/showPdf?pii=S1525-8610%2821%2900333-9

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19

Discuss	Describe	List	Discuss
Discuss nursing home complex demographics	Describe unique infection prevention challenges associated with LTCFs	List factors contributing to infections in the elderly	
			SPICE

**ELEMENTS REQUIRED FOR AN** INFECTION TO OCCUR Chain of Infection SPICE

21

# **HEALTHCARE- ASSOCIATED INFECTIONS (HAI)**

- · Limited data
- 1 3 million serious infections annually
- Infections include:
  - UTI, diarrheal disease, antibioticresistant staph infection and others
- · Major cause of hospitalization
- 380,000 die of infections in LTCFs annually



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22

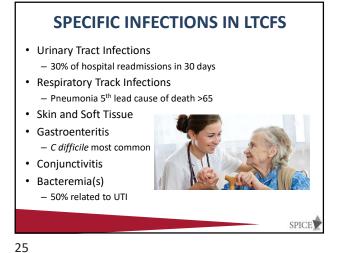
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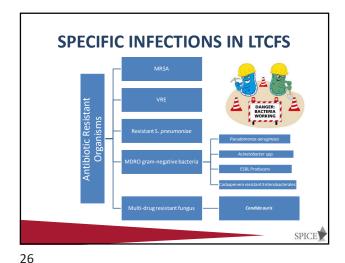
# **HEALTHCARE- ASSOCIATED INFECTIONS (HAI)**

- Account for 26% of all serious adverse events
- 59% deemed preventable
- Among the most frequent causes of transfer to acute care hospitals and 30-day hospital readmissions.
- Cost of infection-related hospitalizations was estimated to be \$83 million in single month

OlG. Adverse Events in Skilled Nursing Facilities: National Incidence Among Medicare Beneficiaries, OEI-06-11-00370, February 2014

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CDC | COC Home | Search | Health Topics A-Z | | Week/ly | Week/ly | March 11, 2005 / 54(98);220-223

Transmission of Hepatitis B Virus Among Persons Undergoing Blood Glucose Monitoring in Long-Term--Care Facilities --- Mississippi, North Carolina, and Los Angeles County, California, 2003--2004

Regular monitoring of blood glucose levels is an important component of routine diabetes care (I). Capillary blood is typically sampled with the use of a fingerstick device and tested with a portable glucometer. Because of outbreaks of hepatitis B virus (IBBV) infections associated with glucose monitoring, CDC and the Food and Drug Administration (FOA) have recommended since 1990 that fingerstick devices be restricted to individual use (2.3). This report describes three recent outbreaks of HBV infection among residents in long-term-care (LTC) facilities that were attributed to shared devices and other breaks in infection-control practices related to blood glucose monitoring. Findings from these investigations and previous reports suggest that recommendations concerning standard precutations and other use of fingerstick devices have not been adhered to or enforced consistently in LTC settings (2-5). The findings underscore the need for education, training, adherence to standard precutations, and specific infection-control recommendations targeting diabetes-care procedures in LTC settings (4-6) (Box 1).

CONTRIBUTING TO INFECTIONS

Medications affecting resistance to

RESIDENT FACTORS (NON-MODIFIABLE)

- infection
- > Limited physiologic reserve
- ➤ Compromised host defenses (↓ cough reflex, thinning skin, decreased tear production and immune dysfunction)
- ➤ Coexisting chronic diseases
- >Impaired responses to infection
- ➤ Increase frequency of therapeutic toxicity

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27

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# Health needs increase with age among nursing home residents

According to the CDC, top diagnoses among nursing home residents are:

Medical Diagnosis	Percentage of Nursing Home Residents	
Hypertension	71.5%	
Alzheimer's disease or other dementias	47.8%	
Depression	46.3%	
Heart Disease	38.1%	
Diabetes	32.0%	

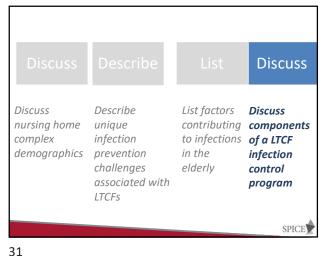
MODIFIABLE FACTORS
CONTRIBUTING TO INFECTION TRANSMISSION

- Lack of a staff member dedicated to the function of infection prevention and control
  - Staff education, monitoring and competency
- · Semi-private rooms
- Inadequate ventilation systems and/or systems maintenance
- Residents sharing space, air, food in a crowded institutional setting
- Multiple visitors



30

28





# **ADDITIONAL NC STATE REGULATIONS**

- · Rules Governing the Sanitation of Hospitals, Nursing and Rest Homes, Sanitariums, Sanitoriums and Other Institutions - 15A NCAC 18A .1300
- NC Communicable Disease Rule 10A NCAC 41A .0206.
- NC Rules for the Licensing of Nursing Homes and Beds in Homes for the Aged Licensed as Part of a Nursing Home

SPICE

33

# **CATEGORIZATION OF** RECOMMENDATIONS

- Category IA: Strongly recommended and strongly supported
- Category IB: Strongly recommended with some support
- Category IC: Required by law/regulation
- ➤ Category II: Recommended for implementation
- ➤ No Recommendation: Unresolved issues

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# **SHEA/APIC GUIDELINE:**

infection prevention and control in the long-term care facility

 In this document, as in several published HICPAC, SHEA, and APIC guidelines, each recommendation is categorized based on existing scientific evidence, theoretical rationale, applicability, and national or state regulations

\*Healthcare Infection Control Practices Advisory Committee (HICPAC)

\*Society Healthcare Epidemiology of America (SHEA) \*Association for Professionals in Infection Control and Epidemiology (APIC) Smith et al; AJIC September 2008

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# LTCF INFECTION PREVENTION **PROGRAM**

- ➤ An active, effective, facility-wide infection prevention program should be established in the LTCF (Cat 1C).
  - The Purpose of the program is to reduce the <u>risk</u> of development and spread of infectious disease
- The IP Program must comply with federal, state and local regulations (Cat 1C)

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36

32

34

35

# INFECTION PREVENTION AND CONTROL PROGRAM (IPCP)

- §483.80 Infection Control
  - The facility must establish and maintain an infection prevention and control program designed to provide a safe, sanitary and comfortable environment and to help prevent the development and transmission of communicable disease and infection

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37 38

# INFECTION PREVENTION AND CONTROL PROGRAM (IPCP)

- Requires system for preventing, identifying, reporting, investigating and controlling infections and communicable diseases that:
  - Covers all residents, staff (direct and indirect care), visitors, volunteers and other service providers. Expectation that facilities tailor the emphasis of their IPCP for visitors and to work tor prevent transmission

For example, "screening may be passive using signs to alert family members and visitors with signs and symptoms of communicable diseases not to enter. More active screening may include the completion of a screening tool or questionnaire which elicits information related to recent exposures or current symptoms. That information is reviewed by the facility staff and the visitor is either permitted to visit or is excluded

- Is based on the individual facility assessment
- Follows accepted national standards

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# **FACILITY-WIDE ASSESSMENT**



39

- "Determine what resources are necessary to care for its residents competently during both day-to-day operations (including nights and weekends) and emergencies"
- "The facility must review and update that assessment:
  - As necessary
  - At least annually
  - Whenever there is, or facility plans for, any change that would require a substantial modification to any part of this assessment"
- Must include a facility-based and community-based risk assessment (MDROs, HAIs and communicable diseases)

Source: Appendix PP State Operations manual\_8/24

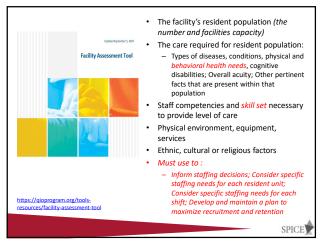
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# Strengthening the Facility Assessment

- Clarifying that facilities must use evidence-based methods when care planning for their residents, including consideration for those residents with behavioral health needs;
- Requiring that facilities use the facility assessment to assess the specific needs of each resident in the facility and to adjust as necessary based on any significant changes in the resident population;
- Requiring that facilities include the input of facility staff, including, but
  not limited to, nursing home leadership, management, direct care staff
  (i.e., nurse staff), representatives of direct care staff, and staff who provide
  other services; and,
- Requiring facilities to develop a staffing plan to maximize recruitment and retention of staff consistent with what was described in the <u>President's</u> <u>April Executive Order on Increasing Access to Higher Quality Care and Supporting Caregivers</u>.

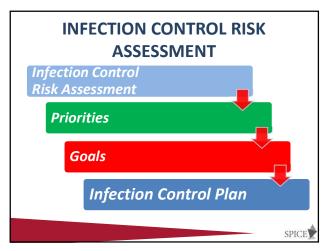
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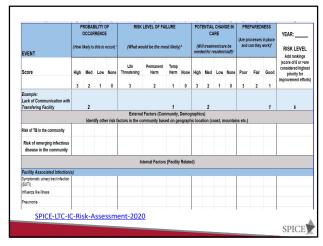
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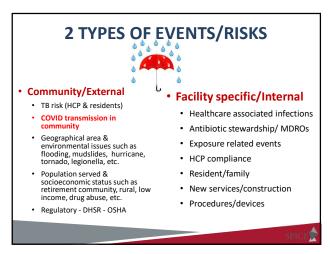


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# INFECTION PREVENTION AND CONTROL PROGRAM (IPCP) • Must include, at a minimum policies and

- Must include, at a minimum policies and procedures that address - §483.80(a)(2):
  - Surveillance (communicable diseases and infections)
  - Reporting
  - Standard and Transmission-based Precautions (define and explain application and how to utilize)
  - Emphasis that isolation should be the least restrictive
- · Ensure staff are aware of policies
- · Annual review of the IPCP and update as needed

Appendix PP State Operations manual 8/24

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48

available

Hand hygiene

 ABHR preferential use

 Selection and use of PPE
 Addressing use of facemasks for residents with new respiratory symptoms
 Addressing resident room assignment
 How to manage when on TBP and single room not

POLICIES INCLUDE-continued

Limiting movement if on TBP

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47

# POLICIES INCLUDE-continued Respiratory Hygiene/Cough Etiquette Increase prevalence of respiratory infections should have facemasks available and offer them to visitors and others entering the facility. Post signs with instructions on visitation restriction for those with symptoms Environmental cleaning and disinfection - Routine cleaning and disinfection/frequently touched surfaces Privacy curtains-changed when visibly dirty - Shared equipment-routine cleaning and disinfection - Objective methods for evaluation Direct observation: Fluorescent markers: Adenosine triphosphate (ATP)

POLICIES INCLUDE-continued

- · Occupational Health
  - Work restrictions, prohibiting contact with food or residents
  - Assess risk for TB based on exposure or cases of TB in the facility and screen
  - Monitor for clusters or outbreaks among staff
  - Exposure control plan

Educate staff, residents and visitors on the IPCP Monitor adherence

Legionellosis

characterized by fever, myalgia, cough, and clinical

- Pontiac fever, a milder illness without pneumonia

INFECTION PREVENTION

AND CONTROL PROGRAM (IPCP)F881

• "Legionellosis" refers to two clinically and

- Legionnaires' disease, which is typically

epidemiologically distinct illnesses:

or radiographic pneumonia and

(e.g., fever and muscle aches).

Caused by Legionella bacteria

program that includes

antibiotic use protocols

and a system to monitor

· A system for recording

SPICE

49

50

# POLICIES INCLUDE-continued

Appendix PP State Operations manual 10/22- 2/23, 8/24

- Linens
  - Use standard precautions if potentially contaminated (e.g., gloves, gowns when sorting and rinsing)
  - No special precautions (e.g., double bagging, melting bags) or categorizing (e.g., biohazard, color-coded) for linen originating in transmission-based precaution rooms is necessary



Appendix PP State Operations manual 10/22; 2/23; 8/24

SPICE

SPICE

51

# 52

# **Water Management**

- Legionella can grow in parts of building water systems that are continually wet (e.g., pipes, faucets, water storage tanks, decorative fountains), and certain devices can spread contaminated water droplets via aerosolization (i.e., converted into a spray or mist in the air).
- Facilities must be able to demonstrate its measure to minimize the risk of Legionella and other opportunistic pathogens in building water systems such as by having a documented water management plan.
  - An assessment (identify where could grow and spread
  - Measures to prevent growth and how to monitor them

CMS does not require water cultures as part of routine program validation

incidents identified and the corrective actions taken

use



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53

# **Antibiotic Stewardship Program**

- Incorporate monitoring of antibiotic use, including the frequency of monitoring/review. Monitor/review response to antibiotics, and laboratory results when available, to determine if the antibiotic is still indicated or adjustments should be made (e.g., antibiotic time-out)
- Facilities should provide feedback (e.g., verbal, written note in record) to prescribing practitioners regarding antibiotic resistance data, their antibiotic use and their compliance with facility antibiotic use protocols to improve prescribing practices and resident outcomes.
- Require antibiotic orders to include the indication, dose, and

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# **ADMINISTRATIVE STRUCTURE**

### (Committee)

- · Oversight of the IP program should be defined and should include participation of the IP, administration, nursing staff, and physician staff (Category II)
  - Meet on regular basis
  - Written minutes with action plans and recommendations
  - **Evaluate effectiveness**
  - Review of IP data

56

Approve policies and procedures



55

## **INFECTION PREVENTIONIST-F882**

- · Collection and analysis of infection data
- Evaluation of products and procedures
- · Development of policies
- Consultation
- Education

57



- Implementation of mandated changes
- Application of epidemiologic principles-outbreak management
- Antimicrobial management
- Research
- High quality services in a cost-efficient manner

# 483.80(b) Infection Preventionist

Issued 10-21-22; Effective 10-21-22; Implementation 10-24-22; Revised 2/23;

- The facility must designate  $\underline{one}\ or\ more\ individuals$  as the infection preventionist (IP) who is responsible for assessing, developing, implementing, monitoring, and managing the IPCP.
- The IPCP includes content required in §§483.80(a)(1)-(4), (F880, Infection Prevention and Control and at F881, Antibiotic Stewardship Program
- While an ASP is a team effort, the IP is responsible for ensuring the program meets the requirements for ASPs (at §483.80(a)(3), F881).
- The IP should review and approve infection prevention and control training topics and content, as well as  $\underline{\textit{ensure facility staff are trained}}$  on the IPCP (for further information, see §483.95(e), F945, Infection Control Training).
  - Does not have to perform the IPCP training, since some facilities may have designated

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58

60

### · Have primary professional training:

- Nursing-earned a certificate/diploma or degree in nursing
- Medical technology-an associate's degree in medical technology or clinical laboratory
- Microbiology-earned a bachelor's degree in microbiology
- Epidemiology-earned a bachelor's degree in epidemiology
- Examples of other related fields of training that are appropriate include physicians, pharmacists and physician's assistants

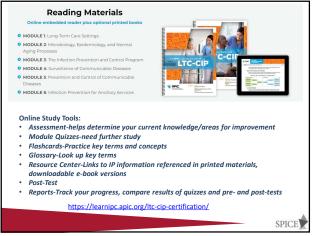


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- · Qualified by education, training, experience or certification
  - The IP should remain current with infection prevention and control issues and be aware of national organizations' quidelines as well as those from national/state/local public health authorities (e.g., emerging pathogens). The facility should ensure the individual selected as the IP has the background and ability to fully carry out the requirements of the IP based on the needs of the resident population, such as interpreting clinical and laboratory data.

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59



Works at least part time in the facility Designated IP hours per week can vary based on the facility and its resident population. Therefore, the amount of time required to fulfill the role  $\underline{\textit{must}}$ be at least part-time and should be determined by the facility assessment, conducted according to §483.70(e), to determine the resources it needs for its IPCP, and ensure that those resources are provided for the IPCP to be effective. Based upon the assessment, facilities should determine if the individual functioning as the IP should be dedicated solely to the IPCP. A facility should consider resident census as well as resident characteristics, types of units such as respiratory care units, memory care, skilled nursing and the complexity of the healthcare services it offers as well as outbreaks and seasonality of infections such as influenza in determining the amount of IP hours needed. - The IP <u>must have the time necessary</u> to properly assess, develop, implement, monitor, and manage the IPCP for the facility, address training requirements, and participate in required committees such as QAA. Must physically work onsite in the facility

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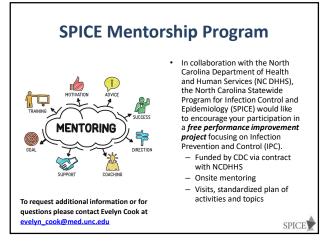
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OIG: Certain For-Profit NH MAY NOT HAVE COMPLIED WITH FEDERAL REQUIREMENTS REGARDING THE INFECTION PREVENTIONIST POSITION (8/24) • 76% (76/100) of the for-profit nursing homes complied with Federal requirements pertaining 17% potentially did not comply with the requirement related to IP completing specialized IPC training prior to assuming the role and 7 potentially did not comply with the requirement to designate an IP SPICE

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63



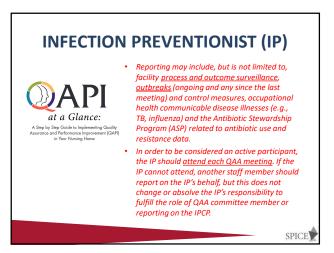
**INFECTION PREVENTIONIST (IP)** The individual designated as the IP (or at least one if there is more than one) must be: -A member of the facilities quality assessment and assurance committee -Report on the IPCP on a

regular basis

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11

SPICE



# **QUALITY ASSURANCE** PERFORMANCE IMPROVEMENT

- · Develop, implement and maintain an effective, comprehensive, data-driven QAPI program
  - Address all systems of care and management practices
  - Include clinical care, quality of life and resident choice
  - Define and measure indicators of quality and facility goals
  - Reflect the complexities, unique care and services the facility provides

"Quality Assurance and Performance Improvement (QAPI)" is the coordinated application of two mutually-reinforcing aspects of a quality management system: Quality Assurance (QA) and Performance Improvement (PI), QAPI takes a systematic, interdisciplinary. comprehensive, and data-driven approach to maintaining and improving safety and quality in nursing homes while involving residents and families in practical and creative problem solving.

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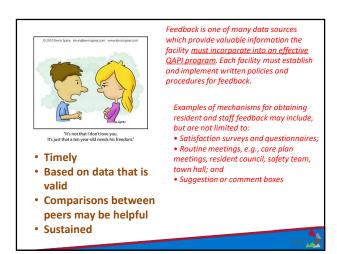
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# **MONITORING PERFORMANCE:**

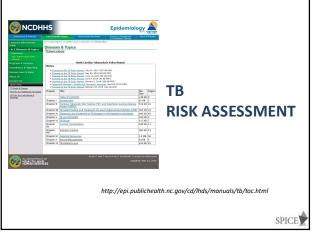






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68



### TB Screening, Testing and Treatment of U.S. Health Care Personnel

(CDC Recommendations 2019)

- U.S. healthcare personnel should be screened for TB upon hire (i.e., preplacement)
- · TB screening includes a process that includes:
  - · A baseline individual TB risk assessment (2019 updated recommendations)
  - · TB symptom evaluation
  - A TB test (e.g., TB blood test or a TB skin test) and
  - Additional evaluation for TB diseased as needed



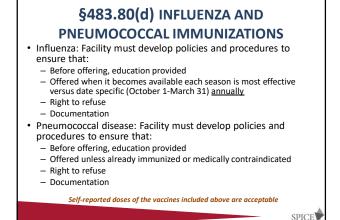
Figure 3.1 Health care worker collecting a blood

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COVID-19 Vaccine Recommendations 12 yrs & older (NOT moderately or severely immunocompromised)

| The course of th

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Federal Register /Vol. 88, No. 107 /Monday,
June 5, 2023 /Rules and RegulationsEffective date: 8/4/23

• The rule also finalizes requirements for these
facilities to provide education about COVID—
19 vaccines and to offer COVID—19 vaccines
to residents, clients, and staff.

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Centers for Medicare & Medicaid Services

LTC part starts on page 184

42 CFR Parts 424, 483, and 484

[CMS-1803-P]

RIN 0938-AV28

Medicare Program; Calendar Year (CY) 2025 Home Health Prospective Payment System (HH PPS) Rate Update; HH Quality Reporting Program Requirements; HH Value-Based Purchasing Expanded Model Requirements; Home Intravenous Immune Globulin (IVIG)

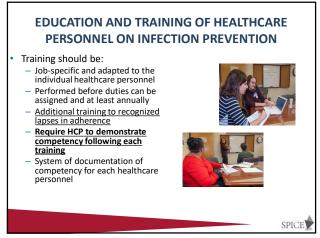
Items and Services Rate Update; and Other Medicare Policies

• § 483.80 Infection control.

— (g) Respiratory illness reporting--(1) Ongoing reporting. The facility must electronically report information on acute respiratory illnesses, including influenza, SARS-CoV-2/COVID-19, and RSV.

77 78

### **KEY ELEMENTS – EMPLOYEE HEALTH** Establish sick leave Adhere to federal Immunize against and state standards and directives vaccine-preventable policies that diseases encourage: applicable to • Hepatitis B Healthcare protecting healthcare workers personnel to stay home when they are • MMR against transmission of infectious agents • Varicella Reporting of signs, Tetanus, diphtheria symptoms, and diagnosed illnesses pertussis • COVID-19 that may represent a risk to their patients and coworkers SPICE



79 80



PATIENT, FAMILY AND CAREGIVER INFECTION PREVENTION EDUCATION Include information about . . . How infections spread How they can be prevented What signs or symptoms should prompt reevaluation and notification of the patient's healthcare provider Instructional materials and delivery should address varied levels of education, language comprehension, and cultural diversity Provide education to patients, family members, visitors, and their caregivers SPICE

82

81

# **IN CONCLUSION**

- ✓ One person, the IP, should be assigned the responsibility of directing, infection control activities in LTCF
- ✓ The IP should have a written job description of infection control activities
- ✓ The IP requires the support of administration in order to function effectively
- ✓ The IP needs to be guaranteed sufficient time to direct the infection control program
- control measures.

✓ The IP should have written authority to institute infection SPICE



83 84