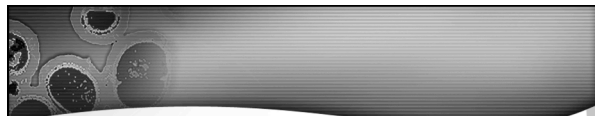


# Infection Prevention Challenges in Home Care and Hospice: Preparing for Survey

Mary McGoldrick, MS, RN, CRNI, Home Health Systems Inc

A Webber Training Teleclass




## Infection Prevention Challenges in Home Care and Hospice: Preparing for Survey


Mary McGoldrick, MS, RN, CRNI  
Home Care and Hospice Consultant

Hosted by Nicole Kenny  
Virox Technologies Inc

www.webbertraining.com November 10, 2011




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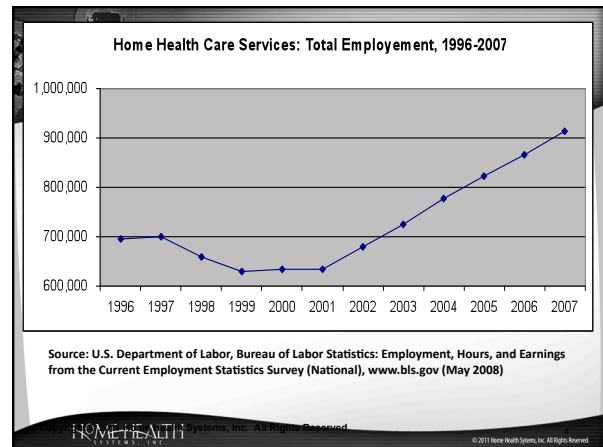
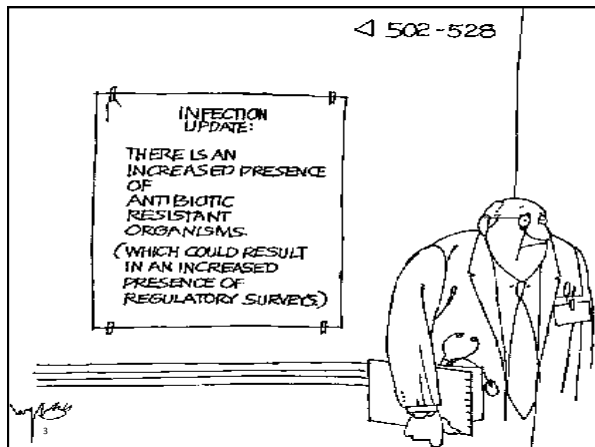

## Learning Objectives

At the conclusion of this session, you will be able to:

- Identify the required structural components for a home care and hospice infection control program.
- Recognize common problems and infection prevention challenges related to care provided in the home setting.
- Strengthen the infection control practices within a home care and hospice organization.
- More effectively prepare for a home care and hospice survey.




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## Home Care and Hospice Surveys: Federal

- Centers for Medicare and Medicaid Services (CMS)
  - Centers for Medicare and Medicaid Services (CMS). (June 5, 2008). *Medicare Conditions of Participation for Hospices*. 42 CFR Part 18. *Federal Register*, Vol. 73, No. 109. 32008-32220.
  - Centers for Medicare and Medicaid Services (CMS). (1963). *Medicare Conditions of Participation for Home Health Agencies*.




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## Home Care and Hospice Surveys: Federal

- Occupational Safety and Health Administration (OSHA)
  - Occupational Safety and Health Administration. (1991). *Occupational Exposure to Bloodborne Pathogens*: Final rule. 29 CFR 1910.1030. *Federal Register*, 56, 64003-64282.
  - Occupational Health and Safety Administration. (2001). *Occupational Exposure to Bloodborne Pathogens; Needlestick and Other Sharps Injuries*: Final Rule. 29 CFR Part 1910.
  - Occupational Health and Safety Administration. (1998). *Respiratory Protection*. Final Rule. 29 CFR Parts 1910 and 1926. *Federal Register*. 63:1152-1300.



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## Home Care and Hospice Surveys

- State:
  - Licensure regulations
  - Medical waste disposal regulations
- Accrediting bodies:
  - The Joint Commission (TJC)
  - Accreditation Commission for Health Care (ACHC)
  - Community Health Accreditation Program (CHAP)

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## Components of a Home Care and Hospice Infection Prevention and Control Program

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## Infection Prevention and Control

**IC.01.01.01** Identifies the individual(s) responsible for infection prevention and control.

- EP 3 Assigns responsibility for the management of infection prevention and control activities to one or more individuals.

*Source: The Joint Commission. (2011). Comprehensive Accreditation Manual for Home Care. Oakbrook Terrace, IL: Author.*

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## Infection Prevention and Control

**IC.01.02.01** Leaders allocate needed resources for infection prevention and control activities.

- EP 1 Provides access to information needed to support infection prevention and control activities.
- EP 3 Provides equipment and supplies to support infection prevention and control activities.

*Source: The Joint Commission. (2011). Comprehensive Accreditation Manual for Home Care. Oakbrook Terrace, IL: Author.*

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## Infection Prevention and Control

**IC.01.03.01** Identifies risks for acquiring and spreading infections.

Identifies infection risks based on:

- EP 1 Geographic location, community, and population served.
- EP 2 Care, treatment, and services it provides.
- EP 3 Analysis of its surveillance activities and other infection control data.
- EP 5 Prioritizes identified risks for acquiring and spreading infections.

*Source: The Joint Commission. (2011). Comprehensive Accreditation Manual for Home Care. Oakbrook Terrace, IL: Author.*

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### HOME CARE INFECTION PREVENTION AND CONTROL RISK ASSESSMENT

TOPIC/ISSUE	PROBABILITY FOR OCCURRENCE				POTENTIAL SEVERITY OR IMPACT				CURRENT SYSTEMS				RISK SCORE	
	HIGH	MEDIUM	LOW	NONE	SEVERE LIFE-THREATENING PERMANENT DISABILITY	MODERATE PAINFUL	SHORT TERM ILLNESS	NONE	HIGH	LOW	MEDIUM	HIGH		
<b>SCORE</b>	3	2	1	0	3	2	1	0	3	2	1	0		
<b>Surveillance Event</b>														
Primary BSI: Laboratory-Confirmed Bloodstream Infection (ICBSI)														
Symptomatic Urinary Tract Infection (SUTI)														
Catheter-Associated Urinary Tract Infection (CAUTI)														
Lower Respiratory Infection (LRI)														
Skin and Soft Tissue Infection: Cellulitis, Soft Tissue, Non-surgical Wound, Decubitus Ulcer, Foreign Body Site														

To Score: Add all numbers across from left to right and enter the total risk score.  
Scoring Key: High risk is defined as a risk score of 5 or higher.

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## Infection Prevention and Control

**IC.01.04.01** Sets goals to minimize the possibility of spreading infections.

Written infection prevention and control goals:

- EP 1 Addressing its prioritized risks.
- EP 2 Limiting unprotected exposure to pathogens.
- EP 3 Limiting spread of infections associated with procedures.
- EP 4 Limiting the spread of infections associated with the use of medical equipment, devices, and supplies.
- EP 5 Improving compliance with hand hygiene guidelines.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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## Infection Prevention and Control

**IC.01.05.01** Plans for preventing and controlling infections.

- EP 1 Uses evidence-based national guidelines or, in the absence of such guidelines, expert consensus, or, in the absence of both, a review and evaluation of the health care literature.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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## CDC HICPAC Guidelines

- *Guidelines for the Prevention of Intravascular Catheter-Related Infections, 2011*
- *Guideline for Prevention of Catheter-associated Urinary Tract Infections, 2009*
- *Guideline for Disinfection and Sterilization in Healthcare Facilities, 2008*
- *Guideline for Isolation Precautions: Preventing Transmission of Infectious Agents in Healthcare Settings, 2007*
- *Management of Multidrug-resistant Organisms in Healthcare Settings, 2006*
- *Prevention and Control of Influenza. Recommendations of the Advisory Committee on Immunization Practices (ACIP), 2006*
- *Guidelines for Preventing the Transmission of Mycobacterium tuberculosis in Health-care Settings, 2005*

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## CDC HICPAC Guidelines

- *Guideline for Environmental Infection Control in Health-Care Facilities, 2003*
- *Guideline for Hand Hygiene in Healthcare Settings, 2002*
- *Guideline for Preventing Healthcare-Associated Pneumonia, 2003*
- *Guideline for the Management of Occupational Exposures to Hepatitis B, Hepatitis C, and HIV and Recommendations for Post-exposure Prophylaxis, 2001*
- *Guideline for the Prevention of Surgical Site Infections, 1999*
- *Guidelines for Infection Control in Health Care Personnel, 1998*
- *Immunization of Healthcare Workers, 1997*

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## Association for Professionals in Infection Control and Epidemiology Elimination Guides

- *Guide to the Elimination of Methicillin-Resistant Staphylococcus aureus (MRSA) Transmission in Hospital Settings, 2nd Edition, 2010*
- *Guide to the Elimination of Acinetobacter baumannii, 2010*
- *Guide to the Elimination of CRBSIs, 2009*
- *Guide to the Elimination of Ventilator-Associated Pneumonia, 2009*
- *Guide to the Elimination of Catheter-associated Urinary Tract Infections (CAUTIs), 2008*
- *Guide to the Elimination of Clostridium difficile, 2008*

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## Prevention and Management of Exposure to Bloodborne Pathogens

- Occupational Safety and Health Administration. (OSHA). (1991). 29 CFR Part 1910.1030, 64003-64282. *Occupational Exposure to Bloodborne Pathogens*; Final Rule. Federal Register/Vol.56, No.235/ December 6, 1991.
- Occupational Health and Safety Administration. (2001). *Occupational Exposure to Bloodborne Pathogens; Needlestick and Other Sharps Injuries*; Final Rule. 29 CFR Part 1910.
- Centers for Disease Control and Prevention. *Updated U.S. Public Health Service Guidelines for the Management of Occupational Exposures to HIV and Recommendations for Post-exposure Prophylaxis*. Morbidity and Mortality Weekly Report. September 30, 2005 / 54(RR09); 1-17.
- Centers for Disease Control and Prevention. *Updated U.S. Public Health Service Guidelines for the Management of Occupational Exposures to HBV, HCV, and HIV and Recommendations for Post exposure Prophylaxis*. Morbidity and Mortality Weekly Report. June 29, 2001 / 50(RR11); 1-42.

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## Professional Standards of Practice and Scientific Methods and Guidelines

- Infusion Nurses Society. (January/February 2011). *Infusion Nursing Standards of Practice*. *Journal of Infusion Nursing*, 34 (suppl.) 1S.
- McGoldrick, M. (2010). Infection Prevention and Control. In Eds. Alexander, M., Corrigan, A., Gorski, L.A., Hankins, J., Perucca, R. *Infusion nursing in clinical practice: An evidence-based approach*. St Louis: Elsevier.
- National Home Infusion Association. (2011). Central Venous Access Devices (CVAD) Guidelines for the Adult Home-based Patient. March 31, 2011.

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## Professional Standards of Practice and Scientific Methods and Guidelines

- Rhinehart, E., McGoldrick, M. (2006). *Infection Control in Home Care and Hospice* for the Association for Professionals in Infection Control and Epidemiology, Inc., (APIC). Sudbury, MA: Jones and Bartlett.
- Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health. (1998, January). *Selecting, evaluating, and using sharps disposal containers*. Atlanta: Author.
- Centers for Disease Control and Prevention. (July, 2010). *The National Healthcare Safety Network Manual: Patient Safety Component Protocols*.

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## Infection Prevention and Control

**IC.01.05.01** Plans for preventing and controlling infections.

- EP 2 Plans infection prevention and control activities, including surveillance, to minimize, reduce, or eliminate the risk of infection.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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## Professional Standards of Practice and Scientific Methods and Guidelines

- APIC-HICPAC Surveillance Definitions for Home Health Care and Home Hospice Infections.
- McGoldrick, M. (2011). Surveillance, Prevention and Control of Infection. *Home Care Infection Prevention and Control Program*. Home Health Systems, Inc. (HomeCareandHospice.com).

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## Infection Prevention and Control

**IC.01.05.01** Plans for preventing and controlling infections.

- EP 3 Plans how it will evaluate its infection prevention and control activities.
- EP 5 Describes, in writing, the process for investigating outbreaks of infectious disease.
- EP 6 Everyone has responsibilities for preventing and controlling infection.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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## Infection Prevention and Control

**IC.01.05.01** Plans for preventing and controlling infections.

- EP 7 Method for communicating responsibilities about preventing and controlling infection to LIPs, staff, visitors, patients, and families. Information for visitors, patients and families includes hand and respiratory hygiene practices.
- EP 8 Identifies methods for reporting infections to external organizations.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Infection Prevention and Control

**IC.01.05.01** Plans for preventing and controlling infections.  
*Applies to hospice deemed status only:*

- EP 9 IC program for surveillance, identification, prevention, control, and investigation of infections and communicable diseases.
- EP 10 IC program is part of the Quality Assessment and Improvement (QAPI) program.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Infection Prevention and Control

**IC.01.06.01** Prepares to respond to an increased number of potentially infectious patients.

- EP 1 Identifies resources that provide information about infections.
- EP 2 Obtains current clinical and epidemiological information regarding new infections.
- EP 3 Method for communicating critical information to LIPs and staff about emerging infections.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Infection Prevention and Control

**IC.01.06.01** Prepares to respond to an increased number of potentially infectious patients.

- EP 4 Describes how it will respond to an increased number of potentially infectious patients.
- EP 5 If accepts an increased number of potentially infectious patients, describes its methods for managing patients over extended period of time.
- EP 6 Activates its response to an increased number of potentially infectious patients.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Implementing the  
Infection Prevention  
and Control Program in  
Home Care and Hospice

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Infection Prevention and Control

**IC.02.01.01** Implements the infection prevention and control activities it has planned.

- EP 1 Implements its infection prevention and control activities, including surveillance, to minimize, reduce, or eliminate the risk of infection.
- EP 2 Uses standard precautions, including PPE to reduce the risk of infection.
- EP 3 Takes precautions in response to way suspected or identified infections are spread within service setting and community.
- EP 5 Investigates outbreaks of infectious disease within its staff and patient.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Infection Prevention and Control

**IC.02.01.01** Implements the infection prevention and control activities as planned

- EP 6 Minimizes the risk of infection when storing and disposing of infectious waste.
- EP 7 Implements its methods to communicate responsibilities for preventing and controlling infection to LIPs, staff, visitors, patients, families. Information for visitors, patients and families includes hand and respiratory hygiene practices.
- EP 8 Reports infection surveillance, prevention, and control information to the appropriate staff.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Infection Prevention  
and Control

**IC.02.01.01** Implements the activities as planned

- EP 9 Reports infections to local, state, and federal public health authorities.
- EP 10 When aware that it transferred a patient with an infection requiring monitoring, treatment, and/or isolation, it informs the receiving organization.
- EP 11 When aware that it received a patient from another organization with an infection requiring action, and the infection was not communicated by the referring organization, it informs the referring organization.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Infection Prevention  
and Control

**IC.02.02.01** Reduces risk of infections associated with medical equipment, devices, and supplies.

Implements activities when:

- EP 1 Cleaning and performing disinfection of medical supplies and devices.
- EP 3 Disposing of medical equipment, devices, and supplies in accordance with law and regulation.
- EP 4 Storing medical equipment, devices, and supplies.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Infection Prevention  
and Control

**IC.02.02.01** Reduces risk of infections associated with medical equipment, devices, and supplies.

*Applies to hospice deemed status only:*

- EP 6 Has available at all times quantity of linen required for proper care and comfort of patients.
- EP 7 Linens handled, stored, processed, and transported in manner that prevents spread of infection spread.

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Infection Prevention  
and Control

**IC.02.03.01** Works to prevent the spread of infectious disease among patients and staff.

- EP 1 Arranges for screening of staff for exposure and/or immunity to infectious disease when workplace contact is possible, and as required by law and regulation or organization policy.
- EP 2 When LIPs or staff have, or are suspected of having, an infectious disease that puts others at risk, organization provides them with or refers them for assessment, testing, immunization, prophylaxis/treatment, or counseling.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Infection Prevention  
and Control

**IC.02.03.01** Works to prevent the spread of infectious disease among patients and staff.

- EP 3 When LIPs or staff have been occupationally exposed to an infectious disease, provides them or refers them for assessment, testing, immunization, prophylaxis/treatment, or counseling.
- EP 4 When patients exposed to an infectious disease, organization provides them or refers them for assessment, testing, immunization, prophylaxis/treatment, or counseling.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

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Evaluating the  
Home Care and Hospice  
Infection Prevention  
and Control Program

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## Infection Prevention and Control

**IC.03.01.01** Evaluates effectiveness of its activities.

- EP 1 Evaluates the effectiveness of its planned infection prevention and control activities annually and whenever risks change.

The evaluation includes a review of the:

- EP 2 Infection prevention and control prioritized risks.
- EP 3 Infection prevention and control goals.
- EP 4 Implementation of infection prevention and control activities.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

## Infection Prevention and Control

**IC.03.01.01** Evaluates the effectiveness of its infection prevention and control activities

- EP 6 Findings from the evaluation are communicated at least annually.
- EP 7 Uses the findings of its evaluation to revise its planned approach for preventing and controlling infections.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

## The Joint Commission: 2011 National Patient Safety Goals

**NPSG.07.01.01:** Reduce the risk of health care-associated infections

- EP1: Implement a program that follows categories 1A, 1B and 1C of either the current CDC or WHO hand hygiene guidelines
- EP2: Set goals for hand hygiene compliance
- EP3: Improve compliance with hand hygiene goals based on hand hygiene goals

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

## Home Care Hand Hygiene Competence Assessment Tool

Download at: [www.HomeCareandHospice.com](http://www.HomeCareandHospice.com)

## The Joint Commission: Sentinel Event

- A sentinel event is an unexpected occurrence involving death or serious physical or psychological injury, or the risk thereof. Serious injury specifically includes loss of limb or function. The phrase, "or the risk thereof" includes any process variation for which a recurrence would carry a significant chance of a serious adverse outcome.

Source: The Joint Commission. (2011). *Comprehensive Accreditation Manual for Home Care*. Oakbrook Terrace, IL: Author.

## Home Health & Hospice Federal Regulations

- Centers for Medicare and Medicaid Services (CMS)
  - Centers for Medicare and Medicaid Services (CMS). (June 5, 2008). *Medicare Conditions of Participation for Hospices*. 42 CFR Part 18. *Federal Register*, Vol. 73, No. 109, 32008-32220.
  - Centers for Medicare and Medicaid Services (CMS). (1963). *Medicare Conditions of Participation for Home Health Agencies*.

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**§418.60 Hospice Condition of Participation:  
Infection Control**

(a) *Standard: Prevention.*

The hospice must follow accepted standards of practice to prevent the transmission of infections and communicable diseases, including the use of standard precautions.

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**§418.60 Hospice Condition of Participation:  
Infection Control**

(b) *Standard: Control.*

The hospice must maintain a coordinated agency-wide program for the surveillance, identification, prevention, control, and investigation of infectious and communicable diseases that—

- (1) Is an integral part of the hospice's quality assessment and performance improvement program; and ...

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**§418.60 Hospice Condition of Participation:  
Infection Control**

(b) *Standard: Control.*

(2) Includes the following:

- (i) A method of identifying infectious and communicable disease problems; and
- (ii) A plan for implementing the appropriate actions that are expected to result in improvement and disease prevention.

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**§418.60 Hospice Condition of Participation:  
Infection Control**

(c) *Standard: Education.*

The hospice must provide infection control education to employees, contracted providers, patients, and family members and other caregivers.

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**§418.58 Hospice Condition of participation:  
Quality assessment and performance  
improvement**

(a) *Standard: Program scope.*

- (1) Measurable improvement in indicators related to improved palliative outcomes and hospice services.
- (2) Measure, analyze, and track quality indicators, including adverse patient events, and other aspects of performance

(b) *Standard: Program data.*

- (1) Use quality indicator data, including patient care, and other relevant data, in the design of its program.
- (2) Use data collected to do the following: (i) Monitor the effectiveness and safety of services and quality of care.
- (ii) Identify opportunities and priorities for improvement.

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**§418.58 Hospice Condition of participation:  
Quality assessment and performance  
improvement**

(b) *Standard: Program data.*

(3) The frequency and detail of the data collection must be approved by the hospice's governing body.

(c) *Standard: Program activities.*

(1) The hospice's PI activities must:

- (i) Focus on high risk, high volume, or problem-prone areas.
- (ii) Consider incidence, prevalence, and severity of problems in those areas.
- (iii) Affect palliative outcomes, patient safety, and quality of care.

(2) PI must track adverse patient events, analyze their causes, and implement preventive actions and mechanisms that include feedback and learning throughout the hospice.

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# Infection Prevention Challenges in Home Care and Hospice: Preparing for Survey

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**§418.58 Hospice Condition of participation: Quality assessment and performance improvement**

(3) Take actions aimed at PI and, after implementing those actions, the hospice must measure its success and track performance to ensure that improvements are sustained.

(d) *Standard: Performance improvement projects.* Develop, implement, and evaluate PI projects.

(1) The number and scope of distinct PI projects conducted annually, based on the needs of the hospice's population and internal organizational needs, must reflect the scope, complexity, and past performance of hospice's services and operations.

(2) Document what PI projects conducted, reasons for conducting projects, and measurable progress achieved .

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**§418.58 Hospice Condition of participation: Quality assessment and performance improvement**

(e) *Standard: Executive responsibilities.* The governing body is responsible for ensuring the following:

- 1) Ongoing program for quality improvement and patient safety is defined, implemented, and maintained, and is evaluated annually.
- 2) Hospice-wide quality assessment and performance improvement efforts address priorities for improved quality of care and patient safety, and that all improvement actions are evaluated for effectiveness.
- 3) One or more individual(s) who are responsible for operating the QAPI program are designated.

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**Home Health Federal Regulations**

- Revised Survey Protocol
- *Pre-Survey Preparation - Review the Potentially Avoidable Events Report*
- *Tier 1*
  - *Identify if any agency patients experienced*
    - *Emergent care for wound infections, deteriorating wound status.*

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**§484.12(c) Home Health Standard: Compliance with Accepted Professional Standards and Principles**

- The HHA and its staff must comply with accepted professional standards and principles that apply to professionals furnishing services in an HHA.
  - *All care providers follow parameters defined by State practice acts, Federal & State laws & regulations, HHA policies and other accepted guidelines (e.g., CDC guidelines for infection control).*

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**§484.30(b) Home Health Standard: Duties of the Licensed Practical Nurse**

- The licensed practical nurse furnishes services in accordance with agency policies.
  - Prepares equipment and materials for treatments observing aseptic technique as required; and ....

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**§484.36(a) Home Health Standard: Home Health Aide Training**

- (1) *Standard: Content and Duration of Training*
  - (iv) Basic infection control procedures.

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**Infection Prevention Challenges in Home Care and Hospice: Preparing for Survey**  
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**Preparing for Survey**

- Written documents:
  - Infection prevention and control policies and procedures
  - Infection control plan with prioritized goals
  - Data measuring compliance w/prioritized goals
  - Surveillance data
  - Infection control risk assessment and program evaluation
  - Bloodborne pathogen exposure control plan
  - Respiratory protection plan

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**Preparing for Survey**

- Knowledge of infection reporting requirements
- Knowledge of surveillance data
- Routine personnel file audits
- Random unannounced:
  - Vehicle
  - Competence assessment visits
  - Observation of patient care

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**Thank You!**

Mary McGoldrick, MS, RN, CRNI  
 Home Care and Hospice Consultant  
 Home Health Systems, Inc.  
 Phone: (912) 634-0469  
 Fax: (800) 649-0017  
 E-mail: [mary@homecareandhospice.com](mailto:mary@homecareandhospice.com)  
 Web: [HomeCareandHospice.com](http://HomeCareandHospice.com)

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