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# Critical Element Pathways Related to Infection Control

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# Use the Critical Element Pathways!



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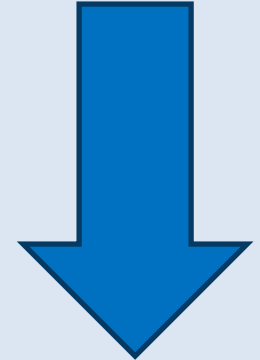
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## Nursing Homes

### Medicare and Medicaid Programs; Reform of Requirements for Long-Term Care Facilities

Nursing home surveys are conducted in accordance with survey protocols and Federal requirements to determine whether a citation of non-compliance appropriate. Consolidated Medicare and Medicaid requirements for participation (requirements) for Long Term Care (LTC) facilities (42 CFR part 483, subpart B) were first published in the Federal Register on February 2, 1989 (54 FR 5316). The requirements for participation were recently revised to reflect the substantial advances that have been made over the past several years in the theory and practice of service delivery and safety. The revisions were published in a final

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## Downloads

[Exhibit 358 -11.10.2022 \(PDF\)](#)

[Exhibit 359 -11.10.2022 \(PDF\)](#)

[CMS-802 \(PDF\)](#)

[LTCSP Initial Pool Care Areas \(ZIP\)](#)

[Initial Surveys \(ZIP\)](#)

[LTCSP Interim Revisit Instructions - Updated 08/03/2018 \(PDF\)](#)

[Appendix PP State Operations Manual \(Revised 02/03/2023\) \(PDF\)](#)

[Revision History for LTC Survey Process Documents and Files Updated 10/26/2023 \(PDF\)](#)

[Survey Resources \(ZIP\)](#)



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LTCSP Initial Pool Care Areas					
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Appendix PP State Operations manual	Microsoft Edge PDF Document	4,176 KB	No	4,463 KB	7%
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List-of-Revised-FTags	Microsoft Edge PDF Document	178 KB	No	185 KB	4%
LTCSP Mapping Document_Streamlined	Microsoft Edge PDF Document	302 KB	No	315 KB	5%
LTCSP Procedure Guide	Microsoft Edge PDF Document	796 KB	No	827 KB	4%
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Offsite Prep Worksheet	Microsoft Word 97 - 2003 Docum...	21 KB	No	97 KB	79%
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LTC Survey Pathways

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CMS-20073 Hospice and End of Life	Adobe Acrobat Document	75 KB	No	114 KB	35%	8/17/2017 1
CMS-20072 General	Microsoft Word Document	20 KB	No	81 KB	77%	8/16/2017 3
CMS-20072 General	Adobe Acrobat Document	26 KB	No	53 KB	51%	8/17/2017 1
CMS-20071 Dialysis	Microsoft Word Document	48 KB	No	54 KB	12%	9/5/2023 12
CMS-20071 Dialysis	Adobe Acrobat Document	161 KB	No	182 KB	12%	10/26/2023
CMS-20070 Dental	Microsoft Word Document	40 KB	No	47 KB	14%	9/5/2023 12
CMS-20070 Dental	Adobe Acrobat Document	104 KB	No	115 KB	11%	6/7/2023 1:1
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CMS-20055 Kitchen	Adobe Acrobat Document	160 KB	No	178 KB	11%	9/12/2022 3
CMS-20054 Infection Prevention Control and Immu...	Microsoft Word Document	64 KB	No	70 KB	9%	6/1/2023 1:2
CMS-20054 Infection Prevention Control and Immu...	Adobe Acrobat Document	172 KB	No	192 KB	11%	6/1/2023 1:2
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### MATRIX INSTRUCTIONS FOR PROVIDERS

The Matrix is used to identify pertinent care categories for: 1) newly admitted residents in the last 30 days who are still residing in the facility, and 2) all other residents. The facility completes the resident name, resident room number and columns 1–20, which are described in detail below. Blank columns are for Surveyor Use Only.

**All information entered into the form should be verified by a staff member knowledgeable about the resident population. Information must be reflective of all residents as of the day of survey.**

**Unless stated otherwise, for each resident mark an X for all columns that are pertinent.**

- Residents Admitted within the Past 30 days:** Resident(s) who were admitted to the facility within the past 30 days and currently residing in the facility.
- Alzheimer's/Dementia:** Resident(s) who have a diagnosis of Alzheimer's disease or dementia of any type.
- MD, ID or RC & No PASRR Level II:** Resident(s) who have a serious mental disorder, intellectual disability or a related condition but does not have a PASRR level II evaluation and determination.
- Medications:** Resident(s) receiving any of the following medications: (I) = Insulin, (AC) = Anticoagulant (e.g., Direct thrombin inhibitors and low weight molecular weight heparin [e.g., Pradaxa, Xarelto, Coumadin, Fragmin]. Do not include Aspirin or Plavix), (ABX) = Antibiotic, (D) = Diuretic, (O) = Opioid, (H) = Hypnotic, (AA) = Antianxiety, (AP) = Antipsychotic, (AD) = Antidepressant, (RESP) = Respiratory (e.g., inhaler, nebulizer).  
**NOTE:** Record meds according to a drug's pharmacological classification, not how it is used.
- Pressure Ulcer(s) (any stage):** Resident(s) who have a pressure ulcer at any stage, including suspected deep tissue injury (mark the highest stage: I, II, III, IV, U for unstageable, S for sDTI) that were not present on admission.
- Excessive Weight Loss without Prescribed Weight Loss program:** Resident(s) with an unintended (not on a prescribed weight loss program) weight loss > 5% within the past 30 days or >10% within the past 180 days. Exclude residents receiving hospice services.
- Tube Feeding:** Resident(s) who receive enteral (E) or parenteral (P) feedings.
- Dehydration:** Resident(s) identified with actual hydration concerns takes in less than the recommended 1,500 ml of fluids daily (water or liquids in beverages and water in foods with high fluid content, such as gelatin and soups).
- Physical Restraints:** Resident(s) who have a physical restraint in use. A restraint is defined as the use of any manual method, physical or mechanical device, material or equipment attached or adjacent to the resident's body that the individual cannot remove easily which restricts freedom of movement or normal access to one's body (e.g., bed rail, trunk restraint, limb restraint, chair prevents rising, mitts on hands, confined to room, etc.). Do not code wander guards as a restraint.
- Fall(s) (F) or Fall(s) with Injury (FI) or Major Injury (FMI):** Resident(s) who have fallen in the facility in the past 120 days or since admission and have incurred an injury or not. A major injury includes bone fractures, joint dislocation, closed head injury with altered consciousness, subdural hematoma.
- Indwelling Urinary Catheter:** Resident(s) with an indwelling catheter (including suprapubic catheter and nephrostomy tube).
- Dialysis:** Resident(s) who are receiving (H) hemodialysis or (P) peritoneal dialysis either within the facility (F) or offsite (O).
- Hospice:** Resident(s) who have elected or are currently receiving hospice services.
- End of Life/Comfort Care/Palliative Care:** Resident(s) who are receiving end of life or palliative care (not including Hospice).
- Tracheostomy:** Resident(s) who have a tracheostomy.
- Ventilator:** Resident(s) who are receiving invasive mechanical ventilation.
- Transmission-Based Precautions:** Resident(s) who are currently on Transmission-based Precautions.
- Intravenous therapy:** Resident(s) who are receiving intravenous therapy through a central line, peripherally inserted central catheter, or other intravenous catheter.
- Infections:** Resident(s) who has a communicable disease or infection (e.g., MDRO-M, pneumonia-P, tuberculosis-TB, viral hepatitis-VH, C, difficile-C, wound infection-WI, UTI), sepsis-SEP, scabies-SCA, gastroenteritis-GI such as norovirus, SARS-CoV-2 suspected or confirmed-COVID, and other-O with description).
- PTSD/Trauma:** Resident(s) who has a diagnosis of Post-Traumatic Stress Disorder (PTSD) and/or a history of trauma.

# CMS 802










## Last updated 10/2023

[www.cms.gov/medicare/cms-forms/  
cms-forms/downloads/cms802.pdf](https://www.cms.gov/medicare/cms-forms/cms-forms/downloads/cms802.pdf)

# Facility Assessment – Free Resources

- <https://nursinghomehelp.org/educational/facility-assessment-tool/>
- <https://qioprogram.org/facility-assessment-tool>

# Infection Control Critical Element Pathway

 CMS-20056 Med Admin	Adobe Acrobat Document	74 KB	No	81 KB	9%	11/8/2017 2
 CMS-20055 Kitchen	Microsoft Word 97 - 2003 Docum...	32 KB	No	133 KB	77%	9/12/2022 3
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# Infection Control Critical Element Pathway

- Surveyors use this document to guide their evaluation of the infection control programs
- Used to evaluate compliance during recertification Survey
- Also used for Focused Infection Control (FIC) Survey

# Infection Control Critical Element Pathway

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES

## Infection Prevention, Control & Immunizations

**Infection Control:** This facility task must be used to investigate compliance at F880, F881, F882, F883, *and* F887. For the purpose of this task, “staff” includes all facility employees (regardless of clinical responsibilities or resident contact), licensed practitioners, adult students, trainees, and, volunteers; and individuals who provide care, treatment or other services for the facility and/or its residents, under contract or by other arrangement. The infection prevention and control program (IPCP) must be facility-wide and include all departments and contracted services. If a specific care area concern is identified, it should be evaluated under the specific care area, such as for pressure ulcers, respiratory care, catheter care, and medication pass observations which include central lines, peripheral IVs, and oral/IM/respiratory medications.

**Focused Infection Control (FIC) Survey (not associated with a recertification):**

- Surveyors must evaluate the facility’s compliance at all critical elements (CE) in the CMS 20054, Infection Prevention, Control & Immunizations pathway with the exceptions of CE#4 (Water Management), CE#5 (Laundry Services), and CE#6 (Antibiotic Stewardship Program).

# Infection Control Critical Element Pathway

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
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## Infection Prevention, Control & Immunizations

### Coordination:

- Each surveyor is responsible for assessing the facility for breaks in infection control throughout the survey and is to answer CEs of concern (e.g., standard and transmission-based precautions, source control).
- One surveyor performs or coordinates (e.g., immunization review) the facility task to review for:
  - Standard and transmission-based precautions
  - Infection Prevention and Control Program (IPCP) standards, policies, and procedures
  - Infection surveillance
  - Water management
  - Laundry services
  - Antibiotic stewardship program (review at least one resident who is receiving an antibiotic if there are concerns)
  - Infection Preventionist
  - Influenza, pneumococcal, and COVID-19 immunizations
- Sample residents/staff as follows:
  - *Sample one staff to verify compliance with requirements for educating and offering COVID-19 immunization (select one staff from the actual working schedules for all staff provided during entrance conference).*
  - Sample three residents on transmission-based precautions (TBP) for purposes of determining compliance with infection prevention and control national standards such as transmission-based precautions, as well as resident care, screening, testing, and reporting.
  - Sample five residents for influenza, pneumococcal, and COVID-19 immunizations review.

### General Standard Precautions:

- Staff are performing the following appropriately:
  - Respiratory hygiene/cough etiquette,
  - Environmental cleaning and disinfection, and
  - Reprocessing of reusable resident medical equipment (e.g., cleaning and disinfection of glucometers per device and disinfectant manufacturer's instructions for use).
- Residents, visitors, and others at the facility wear appropriate source control, in accordance with national standards.
- When there is a known communicable disease outbreak, the facility should screen visitors for signs and symptoms of the communicable disease in accordance with national standards and/or state and local health department recommendations. Screening may be conducted by active or passive (e.g., self-screening) means, depending upon national, state or local recommendations.

### Hand Hygiene:

- Appropriate hand hygiene practices (i.e., alcohol-based hand rub (ABHR) or soap and water) are followed.

# Infection Control Critical Element Pathway

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
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## Infection Prevention, Control & Immunizations

- Staff wash hands with soap and water when their hands are visibly soiled (e.g., blood, body fluids), or after caring for a resident with known or suspected *C. difficile* infection (CDI) or norovirus during an outbreak, or if endemic rates of CDI are high. ABHR is not appropriate to use under these circumstances.
- Staff perform hand hygiene (even if gloves are used) in the following situations:
  - Before and after contact with the resident;
  - After contact with blood, body fluids, or visibly contaminated surfaces;
  - After contact with objects and surfaces in the resident's environment;
  - After removing personal protective equipment (e.g., gloves, gown, eye protection, facemask); and
  - Before performing a procedure such as an aseptic task (e.g., insertion of an invasive device such as a urinary catheter, manipulation of a central venous catheter, and/or dressing care).
- When being assisted by staff, resident hand hygiene is performed after toileting and before meals. How are residents reminded to perform hand hygiene?
- Interview appropriate staff to determine if hand hygiene supplies (e.g., ABHR, soap, paper towels) are readily available and who they contact for replacement supplies.

### Personal Protective Equipment (PPE) Use For Standard Precautions:

- Determine if staff appropriately use and discard PPE including, but not limited to, the following:
  - Gloves are worn if potential contact with blood or body fluid, mucous membranes, or non-intact skin;
  - Gloves are removed after contact with blood or body fluids, mucous membranes, or non-intact skin (and hand hygiene performed);
  - Gloves are changed and hand hygiene is performed before moving from a contaminated body site to a clean body site during resident care;
  - An isolation gown is worn for direct resident contact if the resident has uncontained secretions or excretions (e.g., changing a resident and their linens when excretions would contaminate staff clothing);
  - Appropriate mouth, nose, and eye protection (e.g., facemasks, goggles, face shield) along with isolation gowns are worn for resident care activities or procedures that are likely to contaminate mucous membranes, or generate splashes or sprays of blood, body fluids, secretions or excretions;
  - All staff are following appropriate source control (i.e., facemasks or respirators) in accordance with national standards;
  - PPE is appropriately discarded after resident care, prior to leaving room (except in the case of extended use of PPE per national and/or local recommendations), followed by hand hygiene;
  - If facilities are experiencing PPE shortages outside of their control, they are using PPE optimizing strategies in accordance with national standards; and
  - Supplies necessary for adherence to proper PPE use (e.g., gloves, gowns, masks) are readily accessible in resident care areas (e.g., nursing units, therapy rooms).

# Infection Control Critical Element Pathway

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES

## Infection Prevention, Control & Immunizations

- Interview appropriate staff to determine if PPE supplies are readily available, accessible, and used by staff, and who they contact for replacement supplies.
- Are there sufficient PPE supplies available to follow infection prevention and control guidelines? In the event of PPE shortages, what procedures is the facility taking to address this issue?
  - How do you obtain PPE supplies before providing care?
  - Who do you contact for replacement supplies?
- Transmission-Based Precautions (TBP):**
- Determine if appropriate transmission-based precautions are implemented, including but not limited to:
- For a resident on contact precautions: staff don gloves and isolation gown before contact with the resident and/or his/her environment;
  - For a resident on droplet precautions: staff don a facemask and eye protection (goggles or face shield) within six feet of a resident and prior to resident room entry;
  - For a resident on airborne precautions: staff don a fit-tested N95 or higher-level respirator prior to room entry of a resident;
  - For a resident with an undiagnosed respiratory infection: staff follow standard, contact, and droplet precautions (i.e., facemask, gloves, isolation gown) with eye protection when caring for a resident unless the suspected diagnosis requires airborne precautions (e.g., tuberculosis);
  - Dedicated or disposable noncritical resident-care equipment (e.g., blood pressure cuffs, blood glucose monitor equipment) is used, or if not available, then reusable resident medical equipment is cleaned and disinfected according to manufacturers' instructions using an EPA-registered disinfectant for healthcare settings and effective against the identified organism (if known) prior to use on another resident.
  - Objects and environmental surfaces that are touched frequently and in close proximity to the resident (e.g., bed rails, over-bed table, bedside commode, lavatory surfaces in resident bathrooms) are cleaned and disinfected with an EPA-registered disinfectant for healthcare settings and effective against the organism identified (if known) at least daily and when visibly soiled.
  - Signage on the use of specific PPE (for staff) is posted in appropriate locations in the facility (e.g., outside of a resident's room, wing, or facility-wide).
  - Residents on TBP are placed in a private/single room if available/appropriate, or are cohorted with residents with the same pathogen, or share a room with a roommate with limited risk factors, in accordance with national standards.
  - Before visiting a resident, who is on TBP or quarantine, the facility informs visitors of the potential risk of visiting and precautions necessary when visiting the resident.
- Observe staff to determine if they use appropriate infection control precautions when moving between resident rooms, units and other areas of the facility.
- Interview appropriate staff to determine if they are aware of processes/protocols for transmission-based precautions and how staff is monitored for compliance.
- If concerns are identified, expand the sample to include more residents on transmission-based precautions.

# Infection Control Critical Element Pathway

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES

## Infection Prevention, Control & Immunizations

**1. Did the staff implement appropriate standard (e.g., hand hygiene, appropriate use of PPE, environmental cleaning and disinfection, and reprocessing of reusable resident medical equipment) and transmission-based precautions (if applicable)?**  Yes  No F880

### IPCP Standards, Policies, and Procedures:

- The facility established a facility-wide IPCP including written IPCP standards, policies, and procedures that are current and based on the facility assessment [according to §483.70(e)] and national standards (e.g., for undiagnosed respiratory illness and COVID-19).
- The facility's policies or procedures include which communicable diseases are reportable to local and/or state public health authorities. The facility has a current list of reportable communicable diseases.
- Staff (e.g., infection preventionist) can identify and describe the communication protocol with local/state public health officials (e.g., to whom and when communicable diseases, healthcare-associated infections (as appropriate), and potential outbreaks must be reported).
- The policies and procedures are reviewed at least annually.

**2. Does the facility have an IPCP including standards, policies, and procedures that are current, based on national standards, and reviewed at least annually?**  Yes  No F880

### Infection Surveillance:

- The facility prohibits employees with a communicable disease or infected skin lesions from direct contact with residents or their food, if direct contact will transmit disease. Staff are excluded from work according to national standards.
- The facility has established/implemented a surveillance plan, based on a facility assessment, for identifying, tracking, monitoring and/or reporting of infections, communicable diseases and outbreaks among residents and staff. Interview staff and review the surveillance plan to determine how the staff monitors residents to identify possible infections and communicable diseases.
- The plan includes early detection, management of a potentially infectious, symptomatic resident that requires laboratory testing and/or the implementation of appropriate TBP/PPE (the plan may include tracking this information in an infectious disease log).
- The plan uses evidence-based surveillance criteria (e.g., CDC NHSN Long-Term Care or revised McGeer Criteria) to define infections and the use of a data collection tool.
- The plan includes ongoing analysis of surveillance data and documentation of follow-up activity in response.
- The facility has a process for communicating at time of transfer to an acute care hospital or other healthcare provider the diagnosis to include infection or multidrug-resistant organism colonization status, special instructions or precautions for ongoing care such as transmission-based precautions, medications [e.g., antibiotic(s)], laboratory and/or radiology test results, treatment, and discharge summary (if discharged).

# Infection Control Critical Element Pathway

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES

## Infection Prevention, Control & Immunizations

- The facility has a process for obtaining pertinent notes such as discharge summary, lab results, current diagnoses, treatment, and infection or multidrug-resistant organism colonization status when residents are transferred back from acute care hospitals.
- Interview appropriate staff to determine if infection control concerns are identified, reported, and acted upon.
- The facility conducts testing of staff and residents for communicable diseases (e.g., COVID-19) in accordance with national standards.
- Based on observation or interview, the facility conducts specimen collection and testing in a manner consistent with standards of practice.

3. Did the facility provide appropriate infection surveillance?  Yes  No F880

### Water Management:

Through interview (or record review as necessary), determine whether the facility has:

- Assessed (e.g., description of the building water systems using text and flow diagrams) where Legionella and other opportunistic waterborne pathogens can grow and spread;
- Measures to prevent the growth of Legionella and other opportunistic waterborne pathogens in building water systems that is based on nationally accepted standards (e.g., ASHRAE, CDC, U.S. Environmental Protection Agency or EPA). For example, control measures can include visible inspections, disinfectant, temperature control (that may require mixing valves to prevent scalding);
- A way to monitor the measures they have in place (e.g., testing protocols, acceptable ranges), and established ways to intervene when control limits are not met; and
- Had a resident with legionellosis since the last recertification survey. Interview the infection preventionist (IP) to determine whether the facility has had a case(s). Interview the IP (and perform record review as necessary) to determine what actions the facility took in response to the identified case in the facility. The State Survey Agency should work with local/state public health authorities, if possible, to determine if the water management program was inadequate to prevent the growth of Legionella or other opportunistic waterborne pathogens and whether the facility implemented adequate prevention and control measures once the issue was identified.

4. Did the facility have measures to prevent the growth of Legionella and other opportunistic waterborne pathogens in building water systems?  Yes  No F880  N/A, not a recertification survey

### Laundry Services:

- Determine whether staff handle, store, and transport linens appropriately including, but not limited to:
  - Using standard precautions (e.g., gloves, gowns when sorting and rinsing) and minimal agitation for contaminated linen;
  - Holding contaminated linen and laundry bags away from his/her clothing/body during transport;
  - Bagging/containing contaminated linen where collected, and sorted/rinsed only in the contaminated laundry area (double bagging of linen is only recommended if the outside of the bag is visibly contaminated or is observed to be wet on the outside of the bag);

# Infection Control Critical Element Pathway

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES

## Infection Prevention, Control & Immunizations

- Transporting contaminated and clean linens in separate carts; if this is not possible, the contaminated linen cart should be thoroughly cleaned and disinfected per facility protocol before being used to move clean linens. Clean linens are transported by methods that ensure cleanliness, e.g., protect from dust and soil; and
  - If a laundry chute is in use, laundry bags are closed with no loose items.
- Laundry Rooms – Determine whether staff:
- Maintain/use washing machines/dryers according to the manufacturer's instructions for use;
  - If concerns, request evidence of maintenance log/record; and
  - Use detergents, rinse aids/additives, and follow laundering directions according to the manufacturer's instructions for use.

5. Did the facility store, handle, transport, and process linens properly?  Yes  No F880  N/A, not a recertification survey

### Antibiotic Stewardship Program:

- Determine whether the facility has an antibiotic stewardship program that includes:
- Written antibiotic use protocols on antibiotic prescribing, including the documentation of the indication, dosage, and duration of use of antibiotics;
  - Protocols to review clinical signs and symptoms and laboratory reports to determine if the antibiotic is indicated or if adjustments to therapy should be made and identify what infection assessment tools or management algorithms are used for one or more infections (e.g., SBAR tool for urinary tract infection (UTI) assessment, Loeb minimum criteria for initiation of antibiotics);
  - A process for a periodic review of antibiotic use by prescribing practitioners: for example, review of laboratory and medication orders, progress notes and medication administration records to determine whether or not an infection or communicable disease has been documented and whether an appropriate antibiotic has been prescribed for the recommended length of time. Determine whether the antibiotic use monitoring system is reviewed when the resident is new to the facility, when a prior resident returns or is transferred from a hospital or other facility, during each monthly drug regimen review when the resident has been prescribed or is taking an antibiotic, or any antibiotic drug regimen review as requested by the QAA committee;
  - Protocols to optimize the treatment of infections by ensuring that residents who require antibiotics are prescribed the appropriate antibiotic; and
  - A system for the provision of feedback reports on antibiotic use, antibiotic resistance patterns based on laboratory data, and prescribing practices for the prescribing practitioner.
- If there are concerns with the antibiotic stewardship program, surveyors must complete an investigation utilizing the Unnecessary Medication Review CE Pathway for at least one resident on an antibiotic to assess whether the resident(s) is being prescribed an antibiotic unnecessarily. Expand the sample as needed to determine scope and severity of findings.



# Infection Control Critical Element Pathway

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CENTERS FOR MEDICARE & MEDICAID SERVICES

## Infection Prevention, Control & Immunizations

- Determine whether a resident is already included in the sample from the initial pool or as one of the five residents selected for the unnecessary medication review.
- If there are not any sampled residents, select a high-risk resident receiving an antibiotic from the facility's infection surveillance log (e.g., UTI without a culture, long-term use, no signs or symptoms noted) to add to the sample.

**6. Did the facility conduct ongoing review for antibiotic stewardship?**  Yes  No **F881**  N/A, not a recertification survey

### Infection Preventionist (IP):

During interview with facility administration and Infection Preventionist(s), determine the following:

- The facility designated one or more individual(s) as the infection preventionist(s) who are responsible for the facility's IPCP.
- The Infection Preventionist (s) works at least part-time at the facility.
- The Infection Preventionist(s) completed specialized training in infection prevention and control.

Review facility records for the following related to the designated IP:

- Professional training: the facility must provide documentation of the IP's primary professional training. There must be one of the following:
  - Certificate/diploma or degree in nursing; or
  - Bachelor's degree (or higher) in microbiology or epidemiology; or
  - Associate's degree or higher in medical technology or clinical laboratory science; or
  - Completion of training in another related field such as that for physicians, pharmacists, and physician's assistants.
- Specialized training in infection prevention and control.
  - Completed prior to assuming the role of the IP; and
  - Evidence of completion is available (e.g., certificate).

**7. Did the facility designate at least one qualified IP, who is responsible for the facility's IPCP?**  Yes  No **F882**

### Influenza, Pneumococcal, and COVID-19 Immunizations for Residents:

- Review the records of the five residents (influenza, pneumococcal, and COVID-19) for documentation of:
  - Screening and eligibility to receive the vaccine(s);
  - The provision of education related to the influenza, pneumococcal, and COVID-19 vaccines (such as the benefits and potential side effects);
  - The administration of vaccines in accordance with national recommendations, which includes doses administered.
  - Facilities must follow the CDC and Advisory Committee on Immunization Practices (ACIP) recommendations for vaccines; and

# Infection Control Critical Element Pathway

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES

## Infection Prevention, Control & Immunizations

- Allowing a resident or representative to accept or refuse the influenza, pneumococcal, and COVID-19 vaccines. If not provided, documentation as to why the vaccine(s) was not provided.
- For surveys occurring during influenza season, unavailability of the influenza vaccine can be a valid reason why a facility has not implemented the influenza vaccine program, especially during the early weeks of the influenza season. Similarly, pneumococcal or COVID-19 vaccine supplies may be limited anytime of the year. Ask the facility to demonstrate that:
- The vaccine has been ordered and the facility received a confirmation of the order indicating that the vaccine has been shipped or that the product is not available but will be shipped when the supply is available; and
  - Plans are developed on how and when the vaccines will be administered when they are available.
- As necessary, determine if the facility developed influenza, pneumococcal, and COVID-19 vaccine policies and procedures for residents. Review policies and procedures and interview facility staff and residents and/or resident representatives to determine:
- How residents and/or resident representatives receive education on the benefits and potential side effects before being offered a vaccine. If multiple doses are required, how residents and/or resident representatives, will again receive education on the benefits and potential side effects before being offered the vaccine; and
  - How screening is conducted for eligibility (e.g., medical contraindications, previous vaccination), the vaccines are offered, and consent or refusal is obtained.

**8. Did the facility provide influenza and/or pneumococcal immunizations as required or appropriate for residents?**  Yes  No **F883**

**9. Did the facility educate and offer COVID-19 immunization as required or appropriate for residents?**  Yes  No **F887**

### Educate and Offer COVID-19 Immunizations for Staff

- Review facility documentation for sampled staff for evidence of:
- Screening and eligibility to receive the vaccine(s);
  - The provision of education regarding the benefits, risks and potential side effects associated with the vaccine;
  - Being offered the vaccine or provided information on obtaining the vaccine;
  - The administration of vaccines, if accepted in accordance with national recommendations.
- As necessary, review facility policies and procedures and interview staff to determine:
- How staff are educated on the benefits, risks and potential side effects before being offered a vaccine, for each dose offered;
  - How staff vaccination status is documented;
  - How staff are screened for eligibility (e.g., medical contraindications, previous vaccination), vaccines offered, and consent is obtained; and
  - If the facility provided information to staff on obtaining the vaccine if it is not available in the facility.

**10. Did the facility maintain staff documentation of screening, education, offering, and current COVID-19 vaccination status?**

Yes  No **F887**

# Resources

- [qualityinsights.org/qin](https://qualityinsights.org/qin)
- [www.cms.gov/Medicare/Provider-Enrollment-and-Certification/QAPI/qapitools](https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/QAPI/qapitools)
- [www.cms.gov/medicare/provider-enrollment-and-certification/guidanceforlawsandregulations/nursing-homes](https://www.cms.gov/medicare/provider-enrollment-and-certification/guidanceforlawsandregulations/nursing-homes)
- [www.cms.gov/medicare/cms-forms/cms-forms/downloads/cms802.pdf](https://www.cms.gov/medicare/cms-forms/cms-forms/downloads/cms802.pdf)

# Questions?

## For more information contact:

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