Overview of CMS §483.65 (F441) Infection Control Surveillance Requirements

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Objective

- Identify the key components of the F441 Infection Control Regulation related to surveillance to include;
  - Interpretive Guidelines
  - Investigative Protocol
  - Criteria for Compliance

2009 CMS Surveyor Train - The - Trainer Course
Consolidation of Infection Control Regulations - 2009

F441 - §483.65(a)
Infection Control Program

- The facility must establish an Infection Control Program under which it –
  1. Investigates, controls and prevents infections in the facility;
  2. Decides what procedures such as isolation, should be applied to an individual resident; and
  3. Maintains a record of incidents and corrective actions related to infections

F441 - §483.65(b)
Preventing Spread of Infection

1. When the Infection Control Program determines that a resident needs isolation to prevent the spread of infection, the facility must isolate the resident.

Remember – When appropriate, isolate the infection and not the resident!
F441 - §483.65(b) Preventing Spread of Infection

2. The facility must prohibit employees with a communicable disease or infected skin lesions from direct contact with residents or their food, if direct contact will transmit the disease.

Hand Hygiene is the single most effective means of preventing the spread of infection

3. The facility must require staff to wash their hands after each direct resident contact for which hand washing is indicated by accepted professional practice.
F441 - §483.65(c) Linens

- Personnel must handle, store, process and transport linens as to prevent the spread of infection.

Interpretive Guidance

- Contain authoritative interpretations and clarifications of statutory and regulatory requirements
- Does not replace or supersede the regulation
- May not be used for basis of a citation
- Should not be used as basis for policies / procedures*

CMS &C Letter 08-10 Use of Interpretive Guidance by Surveyors for Long Term Care Facilities

Intent of Regulation

- Assure the facility develops, implements, and maintains an Infection Prevention and Control Program in order to prevent, recognize, and control, to the extent possible, the onset and spread of infection within the facility.
Intent of Regulation - continued

- The program will:
  - Perform surveillance and investigation to prevent, to the extent possible, the onset and the spread of infection;
  - Use records of infection incidents to improve its infection control processes and outcomes by taking corrective actions, as indicated.

Definitions

- Community associated infections – infections present or incubating at the time of admission, or generally develop within 72 hours of admission.

- Health care associated infections (HAIs) – infections that generally occur after 72 hours from the time of admission to a health care facility.

Definitions

- Infection prevention and control program – a program (including surveillance, investigation, prevention, control, and reporting) that provides a safe, sanitary and comfortable environment to help prevent the development and transmission of infection.
Definitions

- **Surveillance** - the ongoing, systematic collection, analysis, interpretation, and dissemination of data to identify infections and infection risks, to try to reduce morbidity and mortality and to improve resident health status

Components of an Infection Prevention & Control Program

- Program Development & Oversight
- Policies & Procedures
- Infection Preventionist
- Surveillance
- Documentation
- Monitoring
- Data Analysis
- Communicable Disease Reporting
- Education
- Antibiotic Review

Components of an Infection Prevention and Control Program

- Policies, procedures, and practices which promote consistent adherence to evidence-based infection control practices;

- Surveillance, including process and outcome surveillance, monitoring, data analysis, documentation and communicable diseases reporting (as required by State and Federal law and regulation)
Polices and Procedures

- Serve as foundation of the program
- Periodically reviewed & revised to ensure consistent w/ current standards of practice and address facility concerns

Surveillance

I. Assess the population
II. Select outcomes or processes
III. Use surveillance definitions
IV. Collect surveillance data
V. Calculate & analyze surveillance rates
VI. Report & use surveillance information

Surveillance

- Use surveillance definitions
  - 2012 McGeer Criteria
    - Used by NHSN
- Process
  - Collect/document symptoms of infection and compare it to case definition
Types of Surveillance

- Outcome - designed to identify & report evidence of an infection
- Incidence
- Prevalence

- Process – reviews practices directly related to care
- Hand hygiene
- Gloves and Gown Adherence

Documentation

- Describe types of infections, healthcare acquired versus community acquired
- Identify trends and patterns
- Program defines how often and by what means data will be collected based on current standards of practice

Monitoring

- Residents at risk for infection
- Residents with infections
- Outbreaks
- Implementation
- Effectiveness
Data Analysis

- Compare current surveillance data to past to detect:
  - Unusual or unexpected outcomes
  - Trends
  - Effective practices
  - Performance issues

Investigative Protocol for Infection Control

- To determine if the facility has a program that:
  - Collects information regarding infections acquired in the facility,
  - Analyzes the information and;
  - Develops a plan of action to prevent further infections

Facility Record Review

- Record of incidents of infection and related corrective actions to help determine whether the facility is identifying, recording, and analyzing infections

- Infection control policies to determine if they are consistent with current professional standards of practice and if the policies are defined by department
Facility Record Review - continued

- Documentation of whether and how the infection prevention and control program collects, analyzes, and uses data and implements a program to guide all disciplines to prevent the spread of infections and identify infections in a standardized and systematic way.

Interview – Infection Preventionist

- Determine if
  - Facility identifies where infections are acquired (Community associated / Health care associated)
  - Facility collects, analyzes, and uses data related to infections, to identify and prevent the spread of infections and adjusts its program (e.g., policies & procedures) as appropriate
  - Program implements and monitors processes r/t hand hygiene, transmission based precautions...

Criteria for Compliance

- The infection control program demonstrates ongoing surveillance, recognition, investigation and control of infections to prevent the onset and the spread of infection, to the extent possible
- The facility demonstrates practices & processes consistent with infection prevention & prevention of cross contamination
Criteria for Compliance

- The facility demonstrates that it uses records of incidents to improve its infection control processes & outcomes by taking corrective action.

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