



**Center for Clinical Standards and Quality/Survey & Certification Group**

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**Ref: S&C: 16-05-ALL**

**DATE:** December 23, 2015

**TO:** State Survey Agency Directors

**FROM:** Director  
Survey and Certification Group

**SUBJECT:** Infection Control Pilot Project

**Memorandum Summary**

- **Project Overview:** The Centers for Medicare & Medicaid Services (CMS) has begun a three year pilot project to improve assessment of infection control and prevention regulations in nursing homes, hospitals, and during transitions of care.
- **Survey details:** All surveys during the pilot will be educational surveys (no citations will be issued) and will be conducted by a national contractor. New surveyor tools and processes will be developed and tested, focusing on existing regulations as well as recommended practices (such as those for antibiotic stewardship and transitions of care). Ten pilot surveys to be conducted in Fiscal Year (FY) 2016 will occur in nursing homes. Surveys in FY17 and FY18 will be conducted in nursing homes and hospitals.
- **Project Outcomes:** New surveyor infection control tools and survey processes that can be used to optimize assessment of new infection control regulations.

**Background**

With funding from the Centers for Disease Control and Prevention (CDC), CMS has begun a pilot project to meet identified joint priorities related to assessing the continuum of infection prevention efforts between hospitals and nursing homes in order to prevent transmission of infections in both settings. The recent U.S. experience with Ebola highlighted the critical importance of infection prevention programs in protecting both healthcare personnel and patients. Translating lessons learned from the Ebola outbreak, including the importance of core infection prevention practices, to every setting where individuals receive healthcare is a significant opportunity to increase the safety of U.S. healthcare facilities.

The role of nursing homes in healthcare delivery has expanded significantly. Over 3 million Americans receive care in U.S. nursing homes each year. Data about infections in nursing homes are limited, but it has been estimated in the medical literature that:

- 1 to 3 million serious infections occur every year in these facilities;

- Common infections include urinary tract infections, diarrheal diseases, antibiotic-resistant staphylococcal infections and other multi-drug resistant organisms; and,
- Infections are a major cause of hospitalization and death; as many as 380,000 people die from infections in nursing homes every year.

There is a clear need to assess the continuum of infection prevention efforts between hospitals and nursing homes in order to prevent transmission of infections in both settings. Assessments in these educational, pilot surveys will allow for further review of infection prevention practices by the healthcare facilities, as well as examination of infection prevention during transitions of care. In addition, where the risk of non-compliance is documented, technical expertise to improve performance can be deployed. Sustainable improvements can then be measured using the CDC National Healthcare Safety Network (NHSN) data.

### **Scope of Work**

CMS will use a national contractor to perform educational pilot surveys. While no citations will be issued, if an Immediate Jeopardy deficiency is noted, a referral to the CMS Regional Office will be made. The surveys will provide nursing homes and hospitals with guidance on improving infection prevention within their catchment area. Starting in FY16, a pilot nursing home surveyor infection control worksheet (ICWS) and pilot survey process, in collaboration with CDC, will better assess compliance with long term care facility infection control requirements that CMS published in 2015 in a Notice of Proposed Rule-Making. To the extent that such requirements are published in final form, we believe that these educational surveys will help the nursing homes become more prepared and help CMS and the CDC develop training materials for both nursing homes and surveyors. In FY17, we expect the educational surveys will be conducted in both hospitals and nursing homes.

Through this effort, issues related to the spread of HAIs between facilities in a local community will also be addressed. After the survey findings are determined, a team of infection control professionals will use those survey findings to develop an action plan for improvement and to organize on-site technical assistance. Follow up visits for technical assistance may occur and long term impact might be measured utilizing NHSN data. The long term goals of this pilot will be improved surveyor infection control tools and survey processes to optimize infection control.

CMS CO staff will communicate details and updates regularly with CMS Regional Offices and State Survey Agencies throughout this three year pilot. The selection of the facilities to participate in this pilot will be communicated at a later time to the Regional Offices.

**Contact:** Please send all questions to Dr. Daniel Schwartz at [daniel.schwartz2@cms.hhs.gov](mailto:daniel.schwartz2@cms.hhs.gov).

**Effective Date:** Immediately. This information should be communicated to all survey and certification staff, their managers and the State/Regional Office training coordinators within 30 days of this memorandum.

/s/

Thomas E. Hamilton

cc: Survey and Certification Regional Office Management