3-25-24 Weekly Clinical Update

Well, by this time, most of you have already heard about the newest QSO letter, QSO-24-08-NH https://www.cms.gov/files/document/qso-24-08-nh.pdf. What had been a "recommendation" from CDC, which CMS decided not to enforce, is now a "requirement" and F880 actually has been amended to include Enhanced Barrier Precautions. In the initial CDC recommendation, they recommended "a new approach to the use of personal protective equipment (PPE) called Enhanced Barrier Precautions (EBP) as a strategy in nursing homes to decrease transmission of CDC-targeted and epidemiologically important MDROs when contact precautions do not apply. The approach recommended gown and glove use for certain residents during specific high-contact resident care activities associated with MDRO transmission and did not involve resident room restriction."

EBP should be used in conjunction with standards precautions, expanding on the use of PPE to donning of gown and gloves during high-contact resident care activities that present exposure to the transfer of MDROs to staff hands and clothing.

It is noted that the requirements from CMS will be effective on April 1, 2024 and we are promised an updated Infection Prevention and Control Critical Element Pathway consistent with the new revisions to F880. In the guidance, "Enhanced Barrier Precautions" (EBP) refer to an infection control intervention designed to reduce transmission of multidrug-resistant organisms that employs targeted gown and glove use during high contact resident care activities."

EBP are indicated when:

- Infection or colonization with a CDC-targeted MDRO when contact precautions do not otherwise apply
- Infection OR colonization with a CDC-targeted MDRO (multidrug-resistant organism) when Contact Precautions do not otherwise apply, OR
- Wounds &/or indwelling medical devices even if the resident is not known to be infected or colonized with an MDRO.

CDC targeted MDROs include but are not limited to:

- MRSA
- MRSA and MSSA
- VRE
- CephR-Klebsiella
- CRE
- Multidrug-resistant Acinetobacter spp

When referencing wound, CMS includes chronic wounds, not shorter-lasting wounds such as skin breaks or skin tears that are covered with an adhesive bandage (Band-Aid) or a similar dressing.

Chronic wounds refers to examples including:

- Pressure ulcers
- Diabetic foot ulcers, unhealed surgical wounds
- Venous stasis ulcers

Indwelling medical devices include examples of:

- Central lines
- Urinary catheter including suprapubic catheters
- Feeding tubes
- Tracheostomies
- NOTE: a peripheral IV line is NOT considered an indwelling medical device requiring EBP.

ANOTHER NOTE: CMS recognizes the value of a person-centered home environment rather than a medical model so they are allowing facilities to have discretion in using EBP for residents who do not have a chronic wound or indwelling medical device and are infected or colonized with an MDRO that is not currently targeted by CDC.

For residents requiring EBP, procedures must be employed when any staff member is performing high-contact resident care activities including:

- Dressing
- Bathing/showering
    - EPB should be followed when transferring or assisting with bathing in a shared/common shower room
- Transferring
    - Gowns & gloves would not be recommended when performing transfers in common areas when contact is a shorter duration
- Providing hygiene
- Changing linens
- Changing briefs or assisting with toileting
- Device care or use for: central line, urinary catheter, feeding tube, trach/ventilator care
- Wound care for any skin opening requiring a dressing
- When working with residents in therapy gym when anticipating close physical contact while assisting with transfers and mobility

Resident in EBP are not restricted to their rooms or from participating in group activities. All EBP are intended to remain in place for the duration of the resident's stay in the facility or until resolution of the wound or removal of the indwelling medical device that placed the resident at high risk.

Facilities must communicate to all staff which residents require EBP, but facilities are encouraged to use "subtle" ways to alert staff to help maintain a home-like environment. Additionally, facilities are required to ensure adequate, accessible supplies of alcohol-based hand rub, gloves, and gowns near or outside the resident's room. The QSO letter references CDC references for more information at: https://www.cdc.gov/hai/containment/PPE-Nursing-Homes.html

The QSO letter did include a guidance tool for reference related to Contact Precautions and EBP:

Resident Status	Contact Precautions	Use EBP
Infected or colonized with any MDRO and has secretions or excretions that are unable to be covered or contained.	Yes	No
Infected or colonized with a CDC-targeted MDRO **without** a wound, indwelling medical device or secretions or excretions that are unable to be covered or contained.	No	Yes
Infected or colonized with a non-CDC targeted MDRO **without** a wound, indwelling medical device, or secretions or excretions that are unable to be covered or contained.	No	At the discretion of the facility
Has a wound or indwelling medical device, **and** secretions or excretions that are unable to be covered or contained and are not known to be infected or colonized with any MDRO.	Yes, unless/until a specific organism is identified.	Yes, if they do not meet the criteria for contact precautions.
Has a wound or indwelling medical device, **without** secretions or excretions that are unable to be covered or contained and are not known to be infected or colonized with any MDRO.	No	Yes

Examples of secretions or excretions include wound drainage, fecal incontinence or diarrhea, or other discharges from the body that cannot be contained and pose an increased potential for extensive environmental contamination and risk of transmission of a pathogen.

One other consideration that facilities may choose to consider is the "Negative Psychosocial Outcome" Guidance from CMS simply because this regulation has the potential to have negative social outcomes for some residents…just a thought.