

## 8-12-22 Weekly Clinical Update

A couple of issues have gotten my attention this week based on survey findings. First, let's take a quick peek at F887, COVID-19 Immunization regulation. In the findings posted this month, we have had 2 deficiencies written based on timing of offering the vaccine to residents in a timely manner. First, I would point out that the released "Advance Copy" of Appendix PP does not include the COVID regulations, including F887.

QSO-21-19-NH says:

"(3) COVID-19 immunizations. The LTC facility must develop and implement policies and procedures to ensure all the following:

(i) When COVID-19 vaccine is available to the facility, each resident and staff member is offered the COVID-19 vaccine unless the immunization is medically contraindicated or the resident or staff member has already been immunized...

SE: SS=F: Failed to ensure staff provide COVID-19 vaccination information/education which included benefit verses risk to ensure informed declination; failed to ensure prompt preparation for administration of COVID-19 booster to residents which was available on 5/19/22; facility currently had 5 residents with COVID-19 & was in outbreak testing

- Review of resident's record revealed resident admitted to facility on 2/24/21 & lacked signed declination form
- Resident's record revealed resident admitted to facility on 8/5/21 & lacked signed declination form
- Failed to provide information/education to include benefit verses risk information for COVID-19 vaccine to ensure informed declination; failed to prepare for administration of most recent COVID-19 booster which became available on 5/19/22 to ensure residents were kept up to date with vaccinations

SE: SS=F: Failed to ensure residents were offered second vaccine booster which became available in timely manner as required

- Failed to ensure residents had an opportunity to receive second COVID-19 booster when available in timely manner as required

I encourage you to do a quick audit on your admission procedures related to determination of COVID-19 vaccination status. If a resident is not considered, "up-to-date" and is eligible to receive a booster at the time of admission, the resident must be offered education/information related to risk/benefits of the vaccine and must sign a consent/declination based on the resident's/representative's decision. This is getting increased attention from State surveyors. State surveyors are surveying resident issues on COVID-19 vaccinations.

I have also had some inquiries about PBJ audits. A particular facility was audited because of significantly increased staffing numbers reported on the PBJ submission after they started offering hire-on bonuses. They are required to offer proof that the DON worked the reported hours. In that particular facility, as is common, the DON is salaried, so does not clock in and out. There would be several ways to "prove" that the DON worked reported hours:

- The DON probably should either clock in and clock out or at least document hours on a calendar or some other device and make sure they are clocking in for floor hours worked
- You could ask IT for data on when DON logs into computer system designating if it was an on-site log-in or remote log-in
- COVID-19 screening forms could prove that the DON entered the building on scheduled days
- Your nursing schedule should have the DON and all of your salaried staff included on the nurse staffing schedule
- Completion of a time card that differentiates hourly and floor hours
- EMR user audit reports