



Top Ten Survey Deficiencies

(TIP TOPIC: Isolation Precautions)

EPIC Tip Sheet

*This tip sheet provides information on the impact of **isolation precautions** in infection control deficiencies cited by the Arizona Department of Health in annual, complaint and special infection control surveys conducted from January 2018-summer 2020. This guide offers basic information on deficiency examples, potential corrective actions and preventive measures a facility can take to avoid future deficiencies. Additional resources are also provided.*

CMS Deficiency – F880 Infection Control

- §483.80 Infection Control

The regulation at F880 requires that nursing facilities establish and maintain “*an infection prevention and control program designed to provide a safe, sanitary and comfortable environment and to help prevent the development and transmission of communicable diseases and infections.*”

The requirements for the Infection Prevention and Control Program (IPCP) include:

- A system for prevention, identification, reporting, investigation and control of infections and communicable diseases. The system must be able to do this for all residents, staff (including those providing services via contract), visitors and volunteers in the facility as well and should be based on the Facility Assessment and follow nationally accepted standards.
- The IPCP must include written standards, policies and procedures for elements of the program including surveillance, reporting potential incidents, standard and transmission-based precautions, isolation, prohibition of employees from direct contact with residents or their food under certain circumstances and hand hygiene. Many of these areas are what are frequently cited on survey since facility staff often fail to follow procedures appropriately, indicating a need for additional focus in these areas through competencies and training.
- A system for recording incidents identified under the IPCP and corrective actions taken by the facility. Deficient practices have been identified in this area when facilities have not completed line listings or tracked GI breakouts in facilities.
- The IPCP must also address how staff handle/store/process and transport linens. The Infection Prevention and Control Program must be reviewed and updated annually and as needed.

The Disaster Ready Emergency Preparedness Infection Control (DR EPIC) program provides education and technical assistance for skilled nursing providers throughout the state. Individual providers will need to exercise their independent discretion in how to apply this information and technical assistance to the unique operation of each facility. For that reason, a facility's exercise of its professional judgment and due diligence in utilizing the program for infection control and risk management practices is solely within the facility's control for which it is entirely responsible.

Examples of Deficiencies Cited for Isolation Precaution Issues:

- Improper use of food trays in an isolation room for a resident with C-diff
- A resident with c-diff cohorted with an immunocompromised resident
- Isolation precautions/contact precautions not followed for a resident with C-diff
- Isolation precautions not in place for a resident with Shingles
- Isolation precautions not in place for a resident with Scabies

Corrective Action/Best Practices to Consider:

- Establish and implement a surveillance program that identifies, tracks and monitors infections in your facility.
- Implement appropriate transmission-based precautions for infections (see resources below).
- Implement training programs for all levels of staff to include:
 - What infections require precautions
 - The types of precautions are necessary
 - What protocols are required for each type of infection including levels of PPE and when to use resident-specific equipment vs. common equipment
 - Competency checks to ensure staff can perform precautions correctly
- Establish and implement communication protocols to ensure that all disciplines know which residents require specific transmission-based precautions.
- Post signs to alert anyone entering an isolation room of the required PPE needed to enter the room.

Resources:

- [CDC guidance on implementing transmission-based precautions](#)
- [Language for Federal F Tag 880](#)
- [List of types of precautions for specific diseases](#)
- [Sign for contact precautions](#)
- [Sign for droplet precautions](#)
- [Sign for airborne precautions](#)

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