



Disposal of Contaminated Waste in Skilled Nursing Facilities and Assisted Living Communities

EPIC Fact Sheet

This is a resource for both skilled nursing facilities and assisted living communities regarding the disposal of contaminated waste. Trash and linen with COVID-19 exposure is often treated as biohazardous. This is not necessary and could potentially cost facilities thousands of dollars. It is important that each facility develop policies and procedures consistent with this guidance.

The requirements from the Occupational Safety and Health Administration (OSHA), the Centers for Disease Control and Prevention (CDC) and the Centers for Medicaid and Medicare Services (CMS) all state that only linen and/or trash that is soiled with blood or other infectious materials is considered **biohazardous** and should be disposed of appropriately in red biohazard bins.

- Medical waste (trash) coming from healthcare facilities treating COVID-19 patients is **no different than waste coming from facilities without COVID-19 patients**. The management of *laundry, food service utensils, and medical waste* should be performed in accordance with **routine procedures**. There is no evidence to suggest that facility waste needs any additional disinfection. Here is a link to this topic from the CDC: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/faq.html#Waste-Management>.
- OSHA further clarifies this language by providing the following definitions:
<https://www.osha.gov/laws-regulations/standardnumber/1910/1910.1030>.
Contaminated Laundry means laundry which has been soiled with blood or other potentially infectious materials or may contain sharps.
Other Potentially Infectious Materials: Any bodily fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids.
- CMS refers to this topic in the guidance to surveyors under F Tag 880 – Infection Control. Here is a link to the State Operations Manual: <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/som107c07pdf.pdf> (scroll to the end under F880).
- **Handling Laundry:** The facility staff should handle all used laundry as potentially contaminated and use standard precautions (i.e., gloves). Alternatively, if not all used linens are handled as potentially contaminated, it should be separated with special identification of bags and containers for contaminated linens. This includes the use of labels, color coding, or other alternative means of separation of the laundry for appropriate handling and processing.
- The Arizona Department of Health Services (ADHS) has created a toolkit that has references to laundry handling as well. Here is the link: (go to page 27 under the topic - linens)
<https://azdhs.gov/documents/preparedness/epidemiology-disease-control/healthcare-associated-infection/advisory-committee/long-term-care/cms-rule-toolkit.pdf>.

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.