

ICF Trade Organizations/ODH/DODD

Date	Question	Answer/Resource	Follow up	
6/8/21	<p>Can ODH provide clarification on what you will be looking for upon survey to be included in each ICF's Infection control program? We've had several conversations with CMS and our understanding is that there is not a regulation requiring ICFs to strictly follow CDC guidance, but that each ICF should have an infection control policy based on clinical guidance. As restrictions are being lifted, especially for vaccinated staff/residents, we would like clarification on how ODH will be surveying for the following:</p> <ol style="list-style-type: none"> Use of masks by staff who are vaccinated and those who are not vaccinated Use of masks by residents who are vaccinated and those who are not vaccinated COVID symptom screening of staff prior to the start of their shifts Temperature checks of staff prior to the start of their shift COVID symptom screening of residents on a daily basis Temperature checks of residents on a daily or other basis Masking expectations related to resident outings in the community for both staff and residents (for both vaccinated and non-vaccinated) Applicability of ICF infection control programs in day service settings, especially those not operated by the ICF 	<p>We are following the QSO memos which specifically reference following CDC guidance. We would expect to see all of the following outlined in policy based upon CDC guidance.</p> <ol style="list-style-type: none"> Face coverings should be worn if there are unvaccinated individuals in the group. <p>Healthcare Personnel</p> <p>In general, fully vaccinated HCP should continue to wear source control while at work. However, fully vaccinated HCP could dine and socialize together in break rooms and conduct in-person meetings without source control or physical distancing. If unvaccinated HCP are present, everyone should wear source control and unvaccinated HCP should physically distance from others.</p> <ol style="list-style-type: none"> Same as A. Should occur QSO 21-14 Should occur QSO 21-14 Daily Daily Masks would be recommended Facilities policies should cover day service settings. (Source control) <p>These things are included within the CDC recommendations.</p>		

6/8/21		<p>Has ODH received any guidance on survey activity related to the new interim final rule related to education and vaccination of staff and residents?</p> <ul style="list-style-type: none"> i. What documentation will surveyors be looking for in regards to staff or residents who were vaccinated prior to the effective date of the interim final rule? j. Will surveyors be looking for evidence of education for those who had already declined vaccination prior to the effective date of the rule? Will surveyors expect those folks to be educated again and offered the vaccine again after the effective date of the rule? k. Does ODH believe there is a requirement for ICFs to re-educate those staff/residents who decline at any regular interval? 	<p>No, without specifics from CMS I can not speculate on the information that will be needed nor the implementation process for this rule (j-k); however, I would suggest that at a minimum the items outlined in the documentation section of the QSO are in place.</p>		
6/8/21		<p>We have heard a report from at least one provider that the ODH surveyor asked the ICF staff if they could take their mask off while completing their review. The surveyor did not state their vaccination status. Can ODH share their requirements for surveyors when they enter ICFs to complete surveys? We would think that is ODH expects ICF staff to wear mask regardless of vaccination status, that the same requirement would apply to surveyors.</p>	<p>Surveyors are not required to state their vaccination status nor are they required to be tested at a facility; however, they should go through the normal screening process. Yes, surveyors should be wearing masks while in patient care areas. If you provide me the name of the facility or the surveyor, I would be more than happy to investigate this.</p>		
6/8/21		<p>Last month we shared some thoughts on what we'd like to see on the ICF annual report. Can ODH share what their thoughts are on updating the annual report? Also, can we get a status update on the ICF data being available online?</p>	<p>At this point we have made no changes to the annual report or the data on-line. However, with the resumption of surveys and the amount of backlog we have coupled with the enhanced enforcement we have had little time.</p>		