

ICF Trade Organizations/ODH/DODD

Date	Question	Answer/Resource	Follow up	
12/8/2020	Providers have voiced concerns with the tone of surveyors during complaint surveys. ICF providers really need technical assistance and support during this time, as they have never had to deal with communicable diseases like this and don't have the experience, knowledge or resources to meet every recommendation.	The role of the surveyor is to determine compliance with federal regulations and state licensure requirements. Technical Assistance while on survey is not allowed by CMS, for example we cant help the facility identify corrective actions. We do have field managers who are very familiar with this provider type who can address questions outside of the survey process. I would suggest reaching out to the LHD or possibly the bureau of infections diseases at ODH or possibly any resources that DODD may have.		
12/8/2020	Will ODH be reviewing "fit testing" of ICF staff during surveys? Many ICF providers do not have access to personnel or resources to perform fit testing. If ODH surveyors can assist ICF providers by performing this function, it would be appreciated.	No, we will not be reviewing this.		
12/8/2020	Can ODH provide an update on the access to ICF survey data OHCA has previously requested?	Not at this time.		

12/8/2020	<p>We heard that at least one ICF provider received an IJ as part of an infection control survey, but they are not members of OHCA so we don't have a lot of details. What we'd like to know is if ODH can provide examples of situations that would lead to an IJ in an ICF related to infection control? What serious offenses is ODH seeing specifically from ICF providers that need to be addressed?</p>	<p>We have not had an IJ within an ICF related to infection control.</p>		
12/8/2020	<p>We appreciate ODH and DODD joining forces to do an infection control webinar for DD providers and we are looking forward to it. We hope that ODH understands that ICFs are different than skilled nursing facilities and have less experience in this area and less access to resources. Most are trying their best to take all precautions they can, but the ability to implement the same precautions as other long term care settings may be challenging based on the structure of the setting, the needs of the people being served and access to resources.</p>	<p>Understand</p>		
12/8/2020	<p>Are ODH surveyors being trained on the differences between ICFs and other settings they survey? We've had a few providers share that surveyors have tried to apply SNF or RCF regulations (or CDC recommendations specific to those settings) to ICFs, but we are typically able to correct them before any citations are issued.</p>	<p>Yes, surveyors are trained in the ICF provider type. We have a limited number of surveyors who survey this provider type.</p>		
12/8/2020	<p>Does ODH have a timeline for restarting ICF annual surveys? While we don't think now is a good time to restart them, our members would like to know if there is a plan.</p>	<p>We are awaiting guidance from CMS.</p>		

12/8/2020	<p>With the State's development of the new Provider Network Module, DODD has advised ICF providers that they will not be able to process new applications for ICFs between January 29th and the implementation of PNM in March. Will ODH be able to fast track new facility certification surveys for any new homes before January 29th?</p>	We can try; however, with the increasing numbers of complaints and Focused infection control surveys it maybe very difficult.		
12/8/2020	<p>Understanding for the Challenges Providers are Facing Today</p> <p>Prior to the global pandemic many if not most of providers in Ohio were facing a Workforce Crisis that has been worsening over the years. The Coronavirus Pandemic has put a strain on providers that was only found in nightmares, we are now calling it a Workforce Emergency. We are asking for patience and partnership as we navigate this emergency. All staff at ICF's are stretched to their absolute limits, especially when dealing with an outbreak of cases. We would welcome the opportunity to working with you on ideas on how we spread the word about the value of working in Ohio's ICF's. Overcoming this barrier is going to take an "all hands on deck" effort. We have to believe, at some level, that is essential for ODH to promote quality services beyond the survey process.</p>	I absolutely agree		
12/8/2020	<p>Partnership vs. Compliance</p> <p>We would like to pursue ways to build partnerships with ODH and surveyors. We believe a more supportive relationship will lead to better discussions and better outcomes. While we understand there needs to be a clear line drawn in the relationship and provider to avoid "picking favorites" but we also believe that an approach by the surveyors that focuses on a positive relationship and support will improve the overall experience. There are many surveyors that adhere to a positive approach but it does vary from area to area. We are happy to partner with ODH to outline what partnership can look like when it comes to the surveyor and provider relationship.</p>	I am more than happy to have conversations regarding partnership. If there are questions related to the specific regulations those can be addressed on survey but identifying corrective actions for the facility to take is not the role of the surveyor.		

12/8/2020	<p>Remote Surveys</p> <p>ICF's, during the global pandemic are stretched to their limits. In order to meet the demands of a remote survey it takes countless hours of scanning information back and forth. Resending information that the surveyor has already received. It also takes the provider's ability to have a conversation about the information with the surveyor, which is an important part of the process. We ask that you rethink the remote survey process. DODD has been very understanding of the challenges providers are facing and have worked with the providers to figure out the best way to conduct a survey or postpone the survey until the provider is better able to handle the process. We would suggest that they come in and ensure that health and welfare is safe by observing the safety measure in place, reviewing staffing numbers, and then complete the other details at a later date. It would only have to wait about 5-10 days until the virus runs its course.</p>	<p>Implementing a process like this would back-up all other survey work. Given the small number of surveyors who are trained in this provider type it would make scheduling this process difficult. We would now need to find 2 spots on a schedule versus 1.</p>		
12/8/2020	<p>Handling Complaints</p> <p>We would like to introduce a process that allows for conversation about complaints to determine whether or not a survey is needed. This dialogue may resolve the situation and may avoid the stress that a survey during the pandemic causes. While we understand the need for complaint surveys/infection control during this time they should not occur in the midst of an outbreak.</p>	<p>CMS dictates our work and when we do complaints. I understand the concern but we cant change the federal requirements to complete complaint surveys.</p>		

12/8/2020	Will ODH provided outcomes for infection control surveys and citations? Example below.	This is a possibility, we will need to discuss with our data team.																																													
	<div><p>Number of ICF/IID Surveys with an Infection Control Citation by Survey Type for CY 2020</p><table><thead><tr><th>Month</th><th>Standard Survey</th><th>Complaint Survey</th><th>Special COVID Survey</th></tr></thead><tbody><tr><td>JAN</td><td>74</td><td>3</td><td>0</td></tr><tr><td>FEB</td><td>68</td><td>2</td><td>0</td></tr><tr><td>MAR</td><td>47</td><td>4</td><td>4</td></tr><tr><td>APR</td><td>0</td><td>19</td><td>32</td></tr><tr><td>MAY</td><td>0</td><td>12</td><td>28</td></tr><tr><td>JUN</td><td>2</td><td>21</td><td>35</td></tr><tr><td>JUL</td><td>8</td><td>15</td><td>44</td></tr><tr><td>AUG</td><td>28</td><td>7</td><td>35</td></tr><tr><td>SEP</td><td>28</td><td>10</td><td>39</td></tr><tr><td>OCT</td><td>9</td><td>1</td><td>22</td></tr></tbody></table></div>	Month	Standard Survey	Complaint Survey	Special COVID Survey	JAN	74	3	0	FEB	68	2	0	MAR	47	4	4	APR	0	19	32	MAY	0	12	28	JUN	2	21	35	JUL	8	15	44	AUG	28	7	35	SEP	28	10	39	OCT	9	1	22		
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