

FAQs: COVID 19 Conference Calls Updated January 7, 2021

The following FAQs are listed by topic in alphabetical order for quick reference. They include website links as information changes quickly. The dates following each link refer to the last time the link was known to be updated.

Unless otherwise noted, the recommendations relate to a home health, hospice, private duty, infusion, palliative care or DMEPOS provider. **Weekly updates made to topics or websites are noted in red with the corresponding week noted to make it easier to see changes week to week.**

If you have questions or comments, please send them to education@chapinc.org Thank you!!

Jan 7 2021: The Public Health Emergency expires January 21, 2021. Extending the emergency declaration allows providers to continue to use waivers and flexibilities issued to assist in responding to the COVID-19 pandemic. The Secretary of HHS issues the PHE statements. The current Secretary Azar leaves office Jan 19, 2021. National health associations are requesting that he extend it before leaving.

A

Assisted and Independent Living Facility Access:

Check your state to determine if the governor or health department has mandated staff COVID-19 testing for ALFs. Home health and hospice staff are included in mandated testing as home care or hospice staff are a 'vendor'. Weekly or bi-weekly COVID 19 testing may be required.

CMS addresses Home Health Agency (HHA) and Hospice access to assisted (ALF) and independent living facilities (ILF) and when Hospices should Discharge Patients if Restricted or No Access

- ALFs and ILFs are not subject to federal regulation, rather state authority.
- Hospice and HHA personnel are expected to participate in any facility required screening.
- If access is restricted, hospices and HHAs should communicate with the facility administration, including the State or local health department when indicated, about the nature of the restriction and gaining access to hospice or home care patients.
- **HOSPICE DISCHARGE:** If after reasonable attempts are made to access hospice patients in person and documented in the patient's record, the hospice is expected to discharge the patient as "outside of the hospice's service area" (Medicare Benefit Policy Manual, Chapter 9, 20.2.3):
 - Additionally, a hospice must forward to the patient's attending physician a copy of the hospice discharge summary and patient's clinical record if requested.
 - <https://www.cms.gov/files/document/covid-faqs-non-long-term-care-facilities-and-intermediate-care-facilities-individuals-intellectual.pdf> June 2020 Pages 9-13
- If an HHA is refused in-person access, document the situation in the patient's record and advise the patient's physician. <https://www.cms.gov/files/document/qso-20-18-hha-revised.pdf>

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(March 10 Memo Revised April 23, 2020. Note the HHA reference to ALF/ILF access on page 6)

C

COVID-19:

Airborne Transmission or Spread of COVID 19:

Evidence that under certain conditions, people with COVID-19 infect others who are more than 6 feet away. The transmissions occur within enclosed spaces with inadequate ventilation. In some instances, the person with COVID 19 was breathing heavily or singing, exercising, or shouting.

- Scientists believe that in these situations infectious smaller droplets and particles from the COVID-19 positive person are concentrated enough to spread the virus to other people in the same space during the same time or shortly after the person with COVID-19 left.
- This spread is called “airborne transmission” and is the same as for TB, for example.
- Again, try to avoid crowded indoor spaces when providing care/services, educate family and caregivers that well ventilated spaces for the patient or client is safest for everyone, bring in outdoor air as much as possible.

COVID-19 spreads less commonly through contact with contaminated surfaces

- Respiratory droplets can also land on surfaces and objects. It is possible that a person could get COVID-19 by touching a surface or object that has the virus on it and then touching their mouth, nose, or eyes. However, touching surfaces is not a common way that COVID-19 spreads

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-covid-spreads.html> Oct 6, 2020

CDC Clinician On-Call Center is a hotline with trained CDC clinicians available to answer COVID-19 questions daily on a wide range of topics, such as diagnostic challenges, clinical management, and infection prevention and control. To reach this service, call 800-CDC-INFO (800-232-4636) and ask for the Clinician On-Call Center.

Children -Pediatric Patients 17 yrs. old and Younger

Children and COVID-19-A Summary from the Children’s Hospital Association and the American Academy of Pediatrics: <https://downloads.aap.org/AAP/PDF/AAP%20and%20CHA%20-%20Children%20and%20COVID-19%20State%20Data%20Report%2010.29.20%20FINAL.pdf>

October 29 2020

- Children represent 11% of all COVID 19 cases, 15%+ increase in October 2020
- In NY and NJ 5% of COVID cases are children,
- Top 10 states by Number of Children’s COVID Cases: CA, IL, FL, TN, AZ, WI, GA, SC, NC, OH

Children who have the following conditions at increased risk for severe COVID 19 illness: obesity, medical complexity, severe genetic disorders, severe neurologic disorders, inherited metabolic disorders, congenital (since birth) heart disease, diabetes, asthma and other chronic lung disease, and immunosuppression due to malignancy or immune-weakening medications.

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<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html> October 6, 2020.

MISC-C: Multisystem Inflammatory Syndrome in Children:

Multisystem inflammatory syndrome in children (MIS-C) is a condition where different body parts become inflamed, including the heart, lungs, kidneys, brain, skin, eyes, or gastrointestinal organs. Children with MIS-C may have a fever and various symptoms, including abdominal (gut) pain, vomiting, diarrhea, neck pain, rash, bloodshot eyes, or feeling extra tired. The cause of MIS-C is not known. Children with the disease test positive for COVID-19 or have been in the presence of a positive COVID-19 patient.

The latest CDC information as of 9/3/2020:

- CDC has received reports of 792 confirmed cases of MIS-C and 16 deaths (2%)
- 99% of cases (783) tested positive for SARS CoV-2, the virus that causes COVID-19. The remaining 1% were around someone with COVID-19.
- Most children developed MIS-C 2-4 weeks after infection with SARS-CoV-2.
- The highest number of cases are among children aged 5-9, *with the average age of 8*.
- > 70% of reported cases occurred in children who are Hispanic/Latino or Non-Hispanic Black
- 54% of reported cases are male.
- https://www.cdc.gov/mis-c/cases/?deliveryName=USCDC_2067-DM37553 Sep 3, 2020

Common Symptoms of MIS-C:

Fever	Neck Pain
Abdominal Pain	Rash
Vomiting	Bloodshot eyes
Diarrhea	Feeling extra tired

NOTE: Not all children have all the same symptoms.

Emergency care is needed for a child with any of the following signs or symptoms:

Trouble breathing	Inability to wake or stay awake
Pain or pressure in the chest that doesn't resolve	Bluish lips or face
New confusion	Severe abdominal pain

The latest MIS-C symptoms and information for parents can be found at:

<https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/children/mis-c.html> (May 20, 2020)

Clinical Study Findings of US COVID 19 Patients:

- The incubation period continues to extend to 14 days, with a median time of 4-5 days from exposure to symptoms onset.¹⁻³
- The signs and symptoms of COVID-19 present at illness onset vary^{1,4-9}:

Fever (83–99%)

Cough (59–82%)

Sputum production (28–33%)

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Anorexia (40–84%) Fatigue (44–70%) Shortness of breath (31–40%)
Myalgias (11–35%)

- *Monitor patients with risk factors for severe illness closely given the possible risk of progression to severe in the second week after symptom onset.*^{5,6,10,11}
- Patients on ACE inhibitors or ARBs may have increased risk of SARS-CoV-2 infection and COVID-19 severity.⁴⁵, however the continuation of these drugs for patients already receiving them for heart failure, hypertension, or ischemic heart disease is highly recommended.⁴
- Additional information about clinical presentation, including hypercoagulability can be found at <https://www.cdc.gov/coronavirus/2019-ncov/hcp/clinical-guidance-management-patients.html> May 20, 2020

COVID-19 VULNERABLE POPULATION by Condition Making Them Priority for Vaccine Access:
<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html> Dec 1 2020

- People of any age with the following conditions:

Cancer	Obesity: (BMI 30kg/m but < 40 kg/m)
Chronic Kidney Disease	Severe Obesity (BMI ≥ 40kg/m)
COPD	Pregnancy
Heart conditions, heart failure, CAD, cardiomyopathies	Sickle Cell Disease
Type 2 Diabetes	Weakened Immune System from solid organ transplant
Smoking	

COVID-19 VULNERABLE POPULATION by Age Making Them Priority for Vaccine Access:
<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/older-adults.html> Nov 27, 2020

Age Range	Hospitalization	Death
18-29 yrs.	Comparison Group	Comparison Group
30-39 yrs.	2X higher	4X -higher
40-49 yrs.	3X higher	10X higher
50-64 yrs.	4X higher	30X higher
65-74 yrs.	5X higher	90X higher
75-84 years	8X higher	220X higher
85+ years	13X higher	630X higher

COVID-19 Symptom List

- **The list of symptoms of COVID-19 infection has been expanded. See CHAP document titled: “COVID-19: Updated Information Related to Symptoms and Protection” on education website at <https://education.chaplinq.org/>**

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D

Disaster Shelters and COVID 19

CDC Guidelines for Disaster Shelters During the Pandemic: The CDC has released guidelines for state and county governments when opening shelters due to disasters (e.g. hurricanes, flooding, etc.).

- 50 or less people in a shelter to support social distancing.
- Daily symptom screening.
- The CDC preference is that vulnerable individuals *are not* moved to a shelter, but to remain at home.
- Medical support shelters and functional needs shelters may be available for the more vulnerable populations during disasters.

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/Guidance-for-Gen-Pop-Disaster-Shelters-COVID19.pdf>

Due to the pandemic, hospitals or SNFs that previously would take patients/clients who had medical needs and had to be evacuated may be unable to take these patients/clients due to COVID-19 risk.

- If the area you serve typically faces disasters (e.g. hurricanes, floods, etc.) and with this information in mind, is there anything you may need to change in patient/client classification for evacuation?
- Companion animals are not preferred in animal shelters during disasters. If the pet is coming from the home of a positive COVID 19 patient/client, please advise a shelter.

<https://www.avma.org/resources-tools/animal-health-and-welfare/covid-19/interim-recommendations-intake-companion-animals-households-humans-COVID-19-are-present>

Additional CDC Disaster Planning Resources for Use During Pandemic

https://www.cdc.gov/disasters/disaster_resources.html (July 1, 2020)

Includes hurricanes, storms, and extreme heat

<https://www.cdc.gov/disasters/hurricanes/covid-19/prepare-for-hurricane.html>

If your patient will be evacuating and staying with another family, and so in closer quarters than usual see information for specific populations: <https://emergency.cdc.gov/groups.asp>

DMEPOS

Prior Authorization for Specific DMEPOS Resumes August 3, 2020, regardless of the status of the public health emergency. CMS will resume full operations for the prior authorization program for certain DMEPOS items.

- For Power Mobility Devices and Pressure Reducing Support Surfaces that require prior authorization as a condition of payment, claims with an initial date of service on or after August 3, 2020, must be associated with an affirmative prior authorization decision to be eligible for payment.
- For an updated list of items that require prior authorization please visit:

https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicare-FFS-CompliancePrograms/DMEPOS/Downloads/DMEPOS_PA_Required-Prior-Authorization-List.pdf.

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Prior authorization will be required for certain LLPs Lower Limb Prosthetic Devices (Healthcare Common Procedure Coding System codes L5856, L5857, L5858, L5973, L5980, and L5987), with dates of service on or after September 1, 2020, in California, Michigan, Pennsylvania, and Texas – this is the new date change from May 11, 2020 pre-COVID 19

- On December 1, 2020, prior authorization for these codes will be required in all the remaining states and territories- this is the pre-COVID new date change from Oct 8 202 pre-COVID 19. <https://www.cms.gov/files/document/provider-burden-relief-fags.pdf> July 2020

DME Signature Requirement at Delivery Waived: (effective 3/1/2020)

- The patient’s signature is waived for those Part B drugs and Durable Medical Equipment (DME) covered by Medicare requiring proof of delivery and/or a beneficiary’s signature.
 - Suppliers should document in the patient record the delivery date and that a signature was not able to be obtained because of COVID-19.

Contractor Flexibility in Requirements for DMEPOS Replacement (effective 3/1/20)

- If durable medical equipment, a prosthetic, orthotic or supply is lost, destroyed, or irreparably damaged or otherwise rendered unusable, contractors can waive replacement requirements such as the face-to-face requirement, new physician’s order, and medical necessity documentation.
 - Suppliers must continue to include a narrative description on the claim explaining why the DMEPOS must be replaced, and maintain documentation indicating that the DMEPOS was lost, destroyed, irreparably damaged or otherwise rendered unusable or unavailable due to the Public Health Emergency. www.cms.gov/files/document/covid-dme.pdf

DME Retail Closure If a shelter-in-place order is declared:

- DMEPOS is considered an essential service in most states. “Essential service” is defined by each state. Whether you stay open is a business decision, and if you can meet social distancing and infection precautions in the retail space. Decide what you will do and document it, including start date.
 - If the retail portion of the company had patients come to the office for CPAP setups, oxygen tank pickup, purchase walkers or canes, you need a process to continue to meet those patients’ needs. Document how you do this, and how you let patients know – the bottom line is meeting patient need.

F

Flu versus COVID-19:

See infographic for use with staff and patients on CHAP education page: [COVID-19/Cold/Flu Infographic](#)

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Symptom: Many symptoms of the Flu and COVID-19 are similar and may vary by degree of severity. These include:

• Fatigue - more common in flu	• GI symptoms, nausea/vomiting/diarrhea - more common in children
• Cough – More common in both	• Headaches
• Aches and pain – more common in flu	• Shortness of breath
• Runny or stuffy nose	
• Sore throat	

COVID-19 symptoms include new loss of taste and/or smell

Symptom Onset

- COVID-19 – Gradual Onset
- Flu – Abrupt onset

Incubation Period

- COVID-19 – 2-14 Days with contagious period 2 days prior to symptom onset and up to 10 days
- Flu – 1-4 days with contagious period 1 day prior to symptom onset and typically 3-4 days of illness but can be contagious as long as 7.

Reduce Risk of Infection COVID and the Flu: Both are respiratory illnesses spread by person to person by close contact or through respiratory droplets when an infected person coughs, sneezes or talks. The preventive measures for the pandemic also help in decreasing the spread of flu:

- Social Distancing
- Mask
- Hand Hygiene

Flu vaccination and COVID resource - <https://www.cdc.gov/vaccines/pandemic-guidance/index.html>

- *Individuals with a positive COVID test* but are asymptomatic – defer the flu vaccination for 10 days from the positive test result date
- *Individuals who are symptomatic or with suspected/confirmed COVID-19*, defer vaccination until:
 - 10 days after symptom onset AND
 - 24 hours with no fever without the use of fever reducing medications AND
 - Improvement of COVID-19 symptoms AND
 - No longer moderately or severely ill.
- *Individuals with known COVID exposure* should not seek the flu vaccine until their 14-day quarantine period has ended.

Flu Vaccination effectiveness: Approximately two weeks after vaccination for protection against the flu.

COVID Vaccination effectiveness: Approximately one-two weeks after all required doses.

Flu resources for patients and staff:

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- 2020 Vaccine Storage and Handling Toolkit: <https://www.cdc.gov/vaccines/hcp/admin/storage/toolkit/index.html>
- Vaccine Administration and storage and handling one page resource guide: <https://www.cdc.gov/vaccines/hcp/admin/downloads/vacc-admin-storage-guide.pdf>
- Take Three Actions to Fight Flu Infographic (English): <https://www.cdc.gov/flu/resource-center/freeresources/graphics/infographic-fight-flu.htm>
- Take Three Actions to Fight Flu Infographic (Spanish): <https://www.cdc.gov/flu/pdf/freeresources/graphics/take3-fight-flu-infographic-sp.pdf>
- Flu fact sheet in multiple languages: <https://www.cdc.gov/flu/resource-center/freeresources/multi-language-factsheets.html> **Flu or COVID-19 or Allergies**

H

Home Cleaning and Disinfecting During the Pandemic: The CDC recommends cleaning and disinfection of households to limit the survival of COVID 19 virus. These recommendations can be made to homemakers, aides and other employees who assist with basic cleaning, laundry, etc. and to families of vulnerable patients.

- Studies continue to show transmission of coronavirus occurs more commonly through airborne respiratory droplets than droplets on furniture, clothing, utensils, etc.
- Current evidence also suggests that COVID 19 may remain viable for hours to days on surfaces made from a variety of materials. Therefore, CDC is recommending the two-step process of cleaning and disinfecting frequently touched areas.
 - **Cleaning** refers to the removal of germs, on visibly dirty surfaces with soap and water or detergents. This does not kill germs but lowers their numbers and the risk of spreading infection such as COVID 19 and other respiratory viral illnesses.
 - **Disinfecting** refers to using chemicals, preferred EPA-approved products, to kills germs on surfaces.
<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19> (May 14,2020)
- Disinfecting does not necessarily clean dirty surfaces or remove all germs but killing germs with a disinfectant on a surface *after* cleaning, further lowers the risk of spreading infection. Be sure to let the disinfectant dry, unless stated otherwise in directions.

Home Cleaning: Frequently touched areas needing cleaning and disinfecting include tables, hard backed chairs, doorknobs, light switches, phone screens, handles, desks, toilets, faucets, sinks.

- **Floors drapes, rugs** use your usual cleaning process, and if soiled with fluids or secretions, recommendation to use a product from the EPA list on the link above.
- **Electronics** including tablets and touch screens, follow the manufacturer's instructions for all cleaning and disinfection products.
 - Consider use of wipeable covers for electronics. If no manufacturer guidance is available,

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- Consider the use of alcohol-based wipes or spray containing at least 70% alcohol to disinfect touch screens.
 - Dry surfaces thoroughly to avoid pooling of liquids which can damage electronics

PPE and Cleaning and Disinfecting Surfaces:

- Wear disposable gloves when cleaning and disinfecting surfaces. Gloves should be discarded after each cleaning.
- If reusable gloves are used, those gloves should be dedicated for cleaning and disinfection of surfaces for COVID-19 and should not be used for other purposes. Consult the manufacturer's instructions for cleaning and disinfection products used.
- Clean hands immediately after gloves are removed.

Laundry: If possible, launder items using the warmest appropriate water setting for the items and dry items completely. Dirty laundry from an ill person, including COVID-19 positive patients can be washed with other people's items.

- Wearing disposable gloves when handling dirty laundry from an ill person is optional. Clean hands immediately after gloves are removed. If not using gloves, wash hands afterwards.
- Clothes hampers: Clean and disinfect hampers using guidance above for surfaces. Consider placing a bag liner that is either disposable (can be thrown away) or can be laundered.
- Trash: Wash hands after handling or disposing of trash.

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html> May 27, 2020

I

Infection Control Focused Audit Tool

January 7, 2021 – CMS QSO memo: QSO-21-08-NLTC

This memo provides revision to the COVID-19 Focused Infection Control Survey Tool for Acute and Continuing Care. The memo provides direct guidance for surveyors regarding the expectations for compliance related to an agency's handling of COVID-19 infection control issues.

CHAP has developed a two page tool for providers to use in self-assessment of their practices to address the pandemic. [Click Here to access COVID-19 Focused Infection Control Audit Tool](#)

L

Licensure-Professionals Ability to Work Across State Lines:

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- **Are clinicians (RNs, LPNs, PTs, PTAs, OTR, COTA, CNAs) able to cross state lines to perform skilled care?** The recognition of licensure in each state to facilitate care across state lines is a state decision. States may implement recognition of other state licensure during a public health emergency. However, the process can be different in each state.
 - Right now, under the nurse licensure compact (NLC), state boards of nursing may issue registered nurses (RNs) and licensed practical nurses (LPNs) with a multistate license, which allows them to practice both in the state where they legally reside and in all other compact states. More information at: <https://nurseslabs.com/nurse-licensure-compact/>
 - There is also compact state licensure for physical therapists and PTAs, more information at <http://ptcompact.org/>

Licensed Practitioners

- **State Nursing Boards are initiating approval of Nurse Practitioners to authorize home health and other services.** Some states are doing so with a letter confirming the extended scope of practice to coincide with the CARES Act law which also recognizes NPs and PAs at the federal level. CHAP encourages you to contact your state Nursing Board or state association to assess progress in your state.
- **Nurse Practitioners (NP) State Scope of Practice:** CMS' recent approval for licensed practitioners to order and certify patients' eligibility for home health during public health emergency also requires that you understand that the NP providing orders is acting within the scope of their practice in each state. You can use the following website for more information:
<https://www.aanp.org/advocacy/state/state-practice-environment>
- **Physician Assistants (PA) State Scope of Practice:** PAs are also licensed practitioners who can order and certify home health. Like NPs, the scope of their practice varies by state. To understand what is required of PAs in your state to provide a valid order for home health, you can use the following website for more information: <http://scopeofpracticepolicy.org/practitioners/physician-assistants/>
- **New Jersey: CHAP HCSF licensure, Division of Consumer Affairs (DCA) advises:**
 - In home plan of care evaluation: Division of Consumer Affairs (NJ) waiver (3/25/2020): Temporary waiver of N.I.A.C. 13:45B-14.9(g) requiring on-site, in home plan of care evaluations; permits required plan of care evaluations by nursing supervisors to be completed by electronic means. <https://www.njconsumeraffairs.gov/COVID19/Documents/DCA-W-2020-02.pdf>

N

Nursing CMS Home Regulations for Testing – Including Hospice and Home Care Staff

CMS has authority over the Medicare Skilled Nursing beds (SNF) and Medicaid nursing facilities. August 26, 2020 CMS released new federal testing regulations for SNFs and ICFs *effective immediately*.

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Each facility must have one or more staff identified as an Infection Preventionist or IP who is responsible for the infection control program.

The federal regulations addressing testing scope and frequency are in addition to any state required testing and any facility-specific testing. CMS' June outreach to nursing homes regarding testing was recommendation, these regulations mandate testing.

<https://www.cms.gov/files/document/qso-20-38-nh.pdf> Aug 27, 2020

The following summarizes key elements of the regulation as it relates to your team entering these facilities:

- All residents and "facility staff" are subject to testing. Facility staff are defined by CMS as employees, consultants, contractors, volunteers, and caregivers who provide care and services to residents.
 - Facility testing frequency can be applied to those who enter at least weekly. It remains the choice of the facility to establish testing requirements for those 'staff' who enter less often.
- Facilities are required to test residents and staff based on parameters and a frequency set forth by the HHS Secretary.

The frequency of testing staff and residents – up to two times per week - is based on a new HHS database that presents % nursing home positive rates in the county that the LTC facility is located. <https://data.cms.gov/stories/s/COVID-19-Nursing-Home-Data/bkwz-xpvg>

- Each facility is required to monitor the database and test resident and staff per the frequency in Table 2: <https://www.cms.gov/files/document/qso-20-38-nh.pdf> Aug 27 2020
 - Each facility must report all positive and negative results to database at the frequency and detail defined by CMS.
 - **NOTE: If your organization tests your staff and provides the results to the facility, clarify what data they will need, how you will be advised of the frequency, and how to report it.**
 - CMS is following CDC guidelines that any facility staff who previously tested positive for COVID-19 do not need to be retested within the 3 months following the positive test.
- To enforce mandated federal reporting requirements an LTC facility found not to be reporting is subject to Civil Monetary Penalties, the first offense is \$1000.

Approved Nursing Home Testing:

- Two types of testing approved by CMS:
 - **Molecular (RT-PCR) tests that detect the virus's genetic material** – diagnostic testing. The test used should be able to detect SARS-CoV2 virus with >95% sensitivity and >90% specificity, and results obtained within 48 hrs.
 - **Antigen tests or Point of Care (POC) testing** that detect specific proteins on the surface of the virus or an active infection before symptoms may appear.

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NOTE for important details about POC or Antigen testing, scroll to “Testing” in the following Section on Operations under “O”.

CMS Regulation for Nursing Home Access by Hospice and Home Health Staff: CMS is addressing how visiting residents can occur acknowledging concerns about physical, mental and emotional health of residents in prolonged isolation. CMS advises precautions can be taken for visits outdoors, in resident rooms, dedicated visitation spaces, and for circumstances beyond typical compassionate care situations

<https://www.cms.gov/medicareprovider-enrollment-and-certificationsurvey/certificationgeninfo/policy-and-memos-states-and/nursing-home-visitation-covid-19> September 17, 2020

Indoor visitation: CMS states that facilities should accommodate and support indoor visitation, considering the following as well as other factors stated in the memo above:

- There has been no new onset of COVID-19 cases in the last 14 days and the facility is not currently conducting outbreak testing (resident or staff testing positive in past 72 hrs.).
- Also consider use of the COVID-19 county positivity rate, found on the COVID-19 Nursing Home Data site as additional information in determining when to facilitate indoor visitation:

Please note the scope of “compassionate care situations” definitions stated by CMS. Consider these in presenting to nursing homes the importance of your care to support access to your patients=note that CMS uses the phrase: “ signs of distress that visitors may be able relieve or reduce” CMS includes the following:

- A resident struggling with the change in environment having previously lived with a family.
- A resident grieving after a friend or family member recently died.
- A resident who needs cueing and encouragement with eating or drinking, which was previously provided by family and/or caregiver(s), is now experiencing weight loss or dehydration.
- A resident, who used to talk and interact with others, is experiencing emotional distress, seldom speaking, or crying more frequently (when the resident had rarely cried in the past).

NOTE for Hospice and Home Health Staff: A facility can identify a way to allow for personal contact, if following all appropriate infection prevention guidelines, and for a limited amount of time.

Facilities may not restrict visitation without a reasonable clinical or safety cause, consistent with §483.10(f)(4)(v). Failure to do so can constitute a potential violation of 42 CFR 483.10(f)(4), and the facility would be subject to citation and enforcement actions

Workers who are not employees of the facility but provide direct care to the facility’s residents, such as hospice workers, social workers, clergy etc., must be permitted to come into the facility as long as they are not subject to a work exclusion due to an exposure to COVID-19 or show signs or symptoms of COVID-19 after being screened.. All staff must comply with COVID-19 testing requirements.

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Nursing Homes Required to Advise Residents and Their Representative of COVID 19 Infection:
<https://www.cms.gov/files/document/nursing-home-reopening-recommendations-state-and-local-officials.pdf> (May 18, 2020)

- Nursing homes must advise residents and their representatives within 12 hrs. of a single occurrence of a confirmed COVID-19 infection, or of 3 or more residents or staff who have new onset of respiratory symptoms within 72 hours. Updates to residents and their representatives must be provided weekly or each subsequent infection outbreak. Facilities must include information on action taken to prevent or reduce the risk of transmission, including if normal operations in the nursing home are altered. The information must be reported in accordance with existing privacy regulations and statute.

O

Operational Changes Under COVID-19:

CDC Recommendations for Staff Diagnostic COVID-19 Testing: NOTE the following recommendations were made by the CDC August 24, 2020. The recommendations apply to staff as well other individuals.

Diagnostic testing is recommended for:

1. The staff member who has signs or symptoms consistent with COVID-19
2. Asymptomatic staff with known or suspected exposure to patients with confirmed SARS-CoV-2 or exposure to positive COVID individuals in their own household.
 - a. At risk exposure is contact for 15 minutes or more within 6 feet of the confirmed positive individual without the appropriate PPE.
 - b. 15 minutes exposure may be 15 minutes total over 24 hours.
3. Staff are asked or referred to get diagnostic testing by their healthcare provider, local or state health department.

When tested, staff should self-quarantine/isolate at home pending test results.

Testing Timing: Testing only identifies the presence of virus at the time of the test. Repeat testing could be considered. Timing of symptoms can be 2-10 days after exposure.

Note: If you request that staff be tested when there is widespread SARS-CoV-2 transmission occurring in your community, positive tests among healthcare staff do not necessarily indicate transmission due to an exposure in the workplace.

CDC Identifies Two (2) Types of Testing:

Definition of Diagnostic Testing for SARS-CoV-2 intended to identify current acute infection in individuals (PT-PCR) tests that detect the virus's genetic material

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Definition of Screening Testing or POC (Point of Care) Testing: intended to identify infected persons who are asymptomatic and without known or suspected exposure to SARS-CoV-2.

- A screening testing is performed to identify persons who may be contagious so that measures can be taken to prevent further transmission. Examples of screening include testing a long-term care facility or an assisted living facility.

<https://www.cdc.gov/coronavirus/2019-ncov/testing/diagnostic-testing.html#who-should-get-tested>
August 24, 2020

POC (Point of Care) Testing or Antigen Testing for SARS-CoV-2:

CDC General Guidance

The FDA has granted emergency use authorization (EUA) for antigen tests that can identify SARS-CoV-2. See FDA's list of In Vitro Diagnostic EUA. <https://www.fda.gov/medical-devices/coronavirus-disease-2019-covid-19-emergency-use-authorizations-medical-devices/vitro-diagnostics-euas> Aug 28, 2020

Antigen Tests Used at the point-of-care (POC) to detect the presence of a specific viral antigen, which implies current viral infection. The currently authorized devices return results in approximately 15 minutes. The reliability of the test and any limitations associated with the test (e.g. if a rapid antigen test known to have false positives and negatives) or the diagnostic test) in writing from the manufacturer and the FDA. Most often the interpretation of the results requires consideration of infection spread in

Additional CDC Antigen Update:

- Antigen tests or point of care (POC) tests per CMS, perform best when the person is tested in the early stages of infection with SARS-CoV-2 when viral load is generally highest.
- *Antigen levels in specimens collected beyond 5-7 days of the onset of symptoms* may drop below the limit of detection of the test. This may result in a negative test result,
- Antigen or POC tests can be used for screening testing in high-risk congregate settings where repeat testing could quickly identify persons with a SARS-CoV-2 infection to support infection prevention and control measures, and prevent or reduce transmission.

https://www.cdc.gov/coronavirus/2019-ncov/lab/resources/antigen-tests-guidelines.html?deliveryName=USCDC_2067-DM37553 Sep 4, 2020

FDA Approved EUA Antigen Tests for use with a CLIA Waiver can be found at:

<https://www.fda.gov/medical-devices/coronavirus-disease-2019-covid-19-emergency-use-authorizations-medical-devices/vitro-diagnostics-euas#individual-antigen> October 14, 2020 (Scroll to Individual Antigen tests)

POC or Antigen Testing Requires a CLIA Waiver:

FDA advises when an Emergency Use Authorization (EUA) for a point-of-care test, that test is deemed to be CLIA-waived. For the duration of the national emergency declaration for COVID-19, such tests can be performed in any patient care setting that operates under a CLIA Certificate of Waiver or Certificate of Compliance/Certificate of Accreditation.

https://www.cdc.gov/csels/dls/locs/2020/fda_clarifies_clia-waived_status.html April 9, 2020

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State Requirements to Conduct Antigen Testing Must Also be Checked: Contact your health department for their interpretation of your organization's ability to conduct testing as each state may vary in requirements for POC testing. List of state agencies from CMS:
<https://www.cms.gov/Regulations-and-Guidance/Legislation/CLIA/Downloads/CLIASA.pdf>

If you need a CLIA waiver, use this website for CLIA application Quick Start Guide:
<https://www.cms.gov/files/document/cms-clia-laboratory-quick-start-guide-remediated.pdf>

POC infection control and POC Test Management: Whenever possible, after collecting the specimen, maintain six feet of separation from the person whose specimen was collected. CDC recommends using Standard Precautions when collecting and handling specimens for POC testing. Follow the manufacturer's guidelines. <https://www.cdc.gov/coronavirus/2019-ncov/lab/point-of-care-testing.html>
[October 14 20-20](#)

- Abbott has a 6-video training program. The first four videos address the preparation, quality control, specimen collection and handling, and patient testing. Each video is no longer than 5 minutes.
- The remaining two videos speak to an APP called Navica.
 - Administrator APP for those who are conducting the testing: App links the test card to the "patient" staff being tested
 - Patient App which once linked to the test card being used allows electronic delivery of the test results.
- Webinar conducted by HHS in conjunction with NAHC was presented on September 25, 2020. Recording not yet posted.

Discontinuing Isolation and Quarantine:

NOTE: State health departments may decide not to follow CDC recommendation and issue their orders that apply to a State or region or municipality.

Symptom Based Strategy to Discontinue Transmission Based Precautions and Isolation:

- For most persons with COVID-19, isolation and precautions can generally be discontinued 10 days *after symptom onset*¹ and resolution of fever for at least 24 hours, without the use of fever-reducing medications, and with improvement of other symptoms.
 - *Symptom onset* is defined as the date on which symptoms first began, including non-respiratory symptoms. Course of Clinical Care Summary will have dates of clinical tests.
 - Note: A limited number of persons with severe illness may produce replication-competent virus beyond 10 days that may warrant extending duration of isolation and precautions for up to 20 days after symptom onset; consider consultation with infection control experts.

Ending Quarantine of Asymptomatic People Testing Positive for COVID 19, Options

- **CDC's recommendation remains 14 days quarantine**, as this option maximally reduces risk of post-quarantine transmission risk and is the strategy with the greatest collective experience at present.

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- The following science and research cited quarantine duration options are offered in an effort to reduce burden on individuals with asymptomatic illness.

Options to CDC 14-day Quarantine That *Public Health Authorities May Put in Place:*

End Quarantine After Day 10 Without Testing	End Quarantine After Day 7 – <i>Diagnostic Testing Required</i>
<ul style="list-style-type: none"> • No evidence of symptoms reported with daily monitoring from the start to day 10 • Post-quarantine transmission risk ranges from 1% to 10% • Symptom monitoring continues through day 14, any changes – self-isolate and be tested • Consistent mask use and social distancing, hand cough hygiene, environmental disinfecting, adequate ventilation, avoid crowds. 	<ul style="list-style-type: none"> • No evidence of symptoms reported with daily monitoring from the start to day 7 • End only by negative Pt-PCR testing, specimen may be collected and tested 48 hrs. before day 7, but quarantine cannot be ended before day 7 • Post-quarantine transmission risk is 5-12% • Required consistent mask use and social distancing, hand cough hygiene, environmental disinfecting, adequate ventilation, avoid crowds.

<https://www.cdc.gov/coronavirus/2019-ncov/more/scientific-brief-options-to-reduce-quarantine.html>

Dec 2, 2020

- **For persons who develop new symptoms consistent with COVID-19 during the 3 months after the date of initial symptom onset**, and an alternative etiology cannot be identified by a provider, the CDC recommends consultation with an infectious disease or infection control expert and retesting may be indicated.

https://www.cdc.gov/coronavirus/2019-ncov/hcp/duration-isolation.html?deliveryName=USCDC_2067-DM35559# Aug 16, 2020

- **Letters for Staff as They Travel:** When stay-at-home orders are in place anticipate that staff will be stopped and asked the reason why they are traveling. Your staff are considered essential health workers in most states. Their ID badge is often not enough. We recommend a short letter on your company’s letterhead. The letter can be short, an example follows.

(Name of company) is providing healthcare services. (Name of staff member) is currently assigned to provide these services to one of our patients in their home. They are carrying an ID badge issued by our company. If you have questions, you can reach us at (insert a 24/7 number if your staff could be out at any time). Thank you.

Signed by an Administrator or Director of Nurses (make it someone in management). Add the CHAP Logo if currently accredited.

- **Admitting COVID 19 Patients:** COVID 19 patients continue to be referred to home health, private duty, and hospice organizations across the country. If you accept COVID-19 patients for care or services, please consider the

The following questions were shared by call participants as helpful in deciding how many COVID 19 patients they can care for.

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- **Ask staff who agrees to care for a COVID 19 patient.** Organizations report that not all staff will, and some staff have resigned rather than face the prospect.
- **How much PPE do you have and need** (e.g. face shields, gloves, gowns, N95 masks)? **CDC offers a PPE 'burn rate calculator:** <https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/burn-calculator.html> (April 7, 2020)
- **Will staff see only COVID 19 patients each day, or mixed with those who are not suspected or confirmed COVID 19?** This decision impacts your PPE inventory. Organizations report two current practices: 1) leave the N95 mask, face shield and gown after use in the patient's home (if not soiled or possibly contaminated, and still 'sound'-not torn, and still fitting appropriately) and place these in a paper bag and the bag inside a box-with cautions for access by pets and children; or 2) staff removes PPE and places the N95 mask in a paper bag in a box in their trunk, and only uses when they see the next COVID 19 patient. In both instances, hand hygiene is performed per OPIM after removing PPE. (Shared practice not endorsed by the CDC).
- **Referral acceptance, request the COVID 19 status of each patient/client:** CHAP recommends adding the question about each patient's COVID 19 status (confirmed, pending testing results, COVID symptoms) to your referral acceptance process – it is critical to the health of the patient, their family and your staff.
 - If the patient has confirmed or suspected COVID 19, remember to get orders for any specific symptom monitoring or intervention for the COVID 19 diagnosis, as well as care for other chronic illnesses.
 - Obtain information how long transmission-based precautions must be maintained or how you will know that the patient/client is no longer considered infectious. Meeting criteria for discontinuation of Transmission-Based Precautions is not a prerequisite for discharge.
- **Collection of COVID 19 Respiratory Specimens for Diagnostic Testing**
 - Nasopharyngeal swab is no longer the preferred method of specimen collection
 - Additional approved methods include oropharyngeal, nasal mid-turbinate. Anterior nares swab or nasopharyngeal wash/aspirate/nasal wash
 - The type of specimen collection is not as important as following proper collection guidelines. The following link provides detailed instruction in the collection guidelines of each method of specimen collection:
 - <https://www.cdc.gov/coronavirus/2019-nCoV/lab/guidelines-clinical-specimens.html> (May 22, 2020)

P

CDC Summary of Managing PPE Shortages at the CHAP Education Web Site:

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PPE:

- **Accessing PPE, the National Declaration of an Emergency distributes PPE via two (2) sources:**
 - **The county and state health departments** – access to the national supply stockpile is distributed from health departments on a governor’s requests:
 - Contact your state or local health department to request supplies.
 - Also contact your state associations for information about accessing supplies – state associations have been able to identify the process which could be formal request (forms to be completed) or requests e-mailed to the health department or local, regional or national suppliers with inventory.
 - When ordering N95 respirators have the model number of the masks fit-tested for your staff. If no model number, provide the manufacturer and year from a mask you have.
- **ASPR Health Care Coalitions as sources of PPE for home care and hospice:** The following site includes a list of organizations that have come together to ensure that providers have what is needed in an emergency. Use the Interactive map in the web location below. Note, those who respond may not have immediately thought of home and community-based care, persist!
 - <https://www.phe.gov/Preparedness/planning/hpp/Pages/find-hc-coalition.aspx> (March 24, 2020)
- **Maximizing PPE:** – the CDC website below offers 5 categories of PPE-specific recommendations to maximize the use of PPE. Note: information is often written with the inpatient setting in mind. Not all categories will apply to care in the home, but many do. Anticipate how to make these protections work in the home care setting.
 - Eye protection
 - Gowns
 - Face Masks
 - N95 respirators – includes fit testing, training on use of respirators, alternative respirators
 - How to calculate your PPE “burn rate” <https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/burn-calculator.html> (April 7 2020)<https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/index.html> (April 3, 2020)

Eye Protection -Face Shield Update, FDA anticipates a Shortage (Aug 11, 2020):

As of July 9, CDC recommends the universal use of eye protection (in addition to a facemask) for HCP working in facilities located in communities with moderate to sustained SARS-CoV-2 transmission is intended to ensure HCP eyes, nose, and mouth are all protected during patient care encounters. <https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html> July 9, 2020

- Protective eyewear (e.g., safety glasses, trauma glasses) with gaps between glasses and the face likely do not protect eyes from all splashes and sprays. CDC update July 15, 2020
- CHAP recommends using the Harvard Global Institute online risk rating by county to identify ‘moderate to sustained’ COVID 19 transmission, namely the areas rated ‘red’ or ‘orange’. The dated

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is updated weekly and utilizes a standardized rating. You can find the data for your county or counties at:

<https://globalepidemics.org/key-metrics-for-covid-suppression/>

- Goggles: provide barrier protection for the eyes. Should fit tightly over and around the eyes or prescription glasses
- Limited availability:
 - Extended use for one staff delivering care to use on multiple patients with COVID-19.
 - Reuse strategy should allow that the eye protection is dedicated to one HCW
 - As able, reprocessing should occur when visibly soiled or removed. See link for reprocessing directions:
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/non-us-settings/emergency-considerations-ppe.html> (May 5, 2020)
 - No Availability of eye protection: Potential alternative includes safety glasses that have side barriers to protect from droplets and splashes

Face Shields:

Face shields provide barrier protection to the facial area and related mucous membranes and are considered an alternative to goggles

August 11 CDC reaffirms face shields are not meant to function as primary respiratory protection and should be used concurrently with a mask.

- As an exception, CDC recommends considering the use of a face shield for those who cannot use a mask, understanding that it offers some protection to the patient as well as protection to caregivers
- CDC advises that although evidence on face shields is limited, not all face shields are equal. The available data suggest that the following face shields may provide better source control than others:
 - Face shields that wrap around the sides of the wearer's face and extend below the chin are the most effective, as well as considering use of hooded face shields.
 - CDC reminder of precautions when a face shield is used to wash hands before and after removing the face shield and avoid touching eyes, nose and mouth when removing it.
- Disposable vs. One Time Use Face Shields
 - Some face shields can only be worn for a single use and disposed of according to manufacturer instructions.
 - Reusable face shields should be cleaned and disinfected after each use according to manufacturer instructions or by following CDC face shield cleaning instructions .
 - Plastic face shields for newborns and infants are NOT recommended.
- <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover-guidance.html>
Aug 7, 2020

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Anticipated Face Shield Shortage: FDA-Issued Emergency Use Authorization (EUA) for Face Shields –

- WHEN ORDERING, what you should see on any FDA approved face shield:
 - The product is labeled accurately to describe the product as a face shield *for medical purposes* and includes a list of the body contacting materials
 - The product is not integrated (combined) with any other article of PPE such as a face mask, but rather is for use as a standalone face shield.
 - Labeling describes the product as intended for either a single user, single use, or for multiple uses by the same user, and includes instructions for recommended cleaning and/or disinfection materials and processes, if applicable.

<https://www.fda.gov/media/136842/download#:~:text=Face%20shields%20can%20be%20intended%20for%20medical%20or,FDA%20under%2021%20CFR%20878.4040%20%E2%80%93%20Surgical%20appar%20el>

Gloves and Re-Use When There is an Inadequate Supply

- Understanding your glove utilization is critical to anticipating PPE burn. In considering which gloves to buy, it is important to know that gloves vary in use and ability to re-use in a crisis. The CDC is providing information to support improved access to gloves as well as re-use.
- **Glove types:** There are two (2) primary types are used in health care, sterile surgical gloves and disposable medical gloves or Patient Examination gloves, referenced as “Examination” gloves most often.
- Home health, home care (private duty), palliation, hospice and home infusion use non-sterile disposable examination gloves. ‘Specialty’ examination gloves often are chemotherapy gloves, which have been tested with chemotherapy agents.
- Glove product codes represent the material used in manufacturing; the following is per the FDA:

Latex – (LYY)	Vinyl – (LYZ)	Synthetic Polymer – (LZA)
Nitrile – (LZA)	Specialty – (LZC)	Finger Cot – (LZB)

Surgical gloves have a product code (NGO) to avoid ordering the wrong product when not needed.

Expiration dates on boxes of gloves are not required by the FDA, only voluntary. If a manufactured date is noted, the FDA recommends not using the gloves if more than 5 years since that date.

- CDC advises you may consider using disposable medical gloves that are *like* FDA-cleared surgical and examination gloves and approved under other U.S. or international standards. Examples are shown in the table at the following website. You would be looking for ‘Examination’ gloves.
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/gloves.html> (April 30, 2020)
- The use of gloves by staff when it is reasonably anticipated that contact with blood or other potentially infectious materials, mucous membranes, nonintact skin, or potentially contaminated intact skin could occur is not being waived.
 - *During a glove supply crisis gloves, can be used up to 4 hours continuously, but must be cleaned between patients to prevent cross transmission from patient to patient.*

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CDC offers two (2) means for re-use of medical, examination gloves in a time of crisis and inadequate supply.

- 1) **Alcohol-based Hand Sanitizer (ABHS):** If not visibly soiled, disposable latex and nitrile glove brands maintain their integrity when disinfected for up to six (6) applications of ABHS or until the gloves become otherwise contaminated or ineffective (wear, tears, etc.). Follow hand hygiene guidance for proper application of ABHS.
- 2) **Soap and water** can be used to clean donned, disposable medical gloves between tasks or patients. Long-cuffed surgical gloves are recommended as washing may be impractical for short cuffed gloves where water may become trapped inside the worn gloves which then must be discarded. Disposable medical gloves can be cleaned with soap and water up to 10 times or until the gloves become otherwise contaminated or ineffective. Follow hand hygiene guidance for proper soap and water hand hygiene procedures.

Discard disposable medical or examination gloves always after:

- Visible soiling or contamination with blood, respiratory or nasal secretions, or other body fluids occurs.
- Any signs of damage (e.g., holes, rips) or degradation are observed; and
- Maximum of four (4) hours of continuous use.
- Doffing. Previously removed gloves should not be re-donned as the risk of tearing and contamination increases. Disposable glove “re-use” should not be performed.
- After removing gloves for any reason, hand hygiene should be performed with alcohol-based hand sanitizer or soap and water.

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/gloves.html> (April; 30, 2020)

Masks with Exhalation Valves or Vents Not Recommended for Source Control

Awareness for patient’s families and others: CDC warns that masks with one-way valves or vents allow air to be exhaled through a hole in the material, and therefore can result in expelled respiratory droplets that can reach others. This type of mask does not prevent the person wearing the mask from transmitting COVID-19 to others.

N95 Masks - Particulate filtering facepiece respirators

- There are two types of respirators, standard N95 and surgical N95. When trying to access, you need only N95 or equivalent.
- Respirators are for healthcare staff who need protection from both:1) airborne droplets and 2) fluid as the close fit is to avoid permeation of both.

KN95 NIOSH (National Institute of Occupational Safety) Sampling identifies KN95 Masks that do not meet basic filtering standards, and in some cases are counterfeit.

- NIOSH developed tests to assess the filter efficiency and penetration (>95%) of a sample of respirators represented as certified by an international certification authority. NIOSH states that usual testing was not done previously due to the respirator shortage associated with COVID-19.
- NIOSH samples identified products that failed filtering tests.

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- NIOSH has provided a table at the link below to identify the manufacturer and filtering test results. The table is regularly updated, even daily.
 - NIOSH warns of respirator masks with an ear loop design. NIOSH-approved N95s typically have head bands. Limited assessment of ear loop designs indicate difficulty achieving a proper fit.
 - NIOSH advises that while the manufacturer listed in the table at the link below is the manufacturer of record, NIOSH has been informed that some of these are counterfeit products. Some products with legitimate manufacturer names, showing poor filter penetration results (<95%), are counterfeit products.

Updated NIOSH website: <https://www.cdc.gov/niosh/npptl/respirators/testing/NonNIOSHresults.html>
August 7, 2020

Conserving Inventory of Respirator Masks: Two (2) Ways to Approach

- **Respirator Extended use:** wearing the same respirator mask for repeated close contact encounters with patients, the maximum recommended extended use period is 6 hrs.
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/non-us-settings/emergency-considerations-ppe.html> (May 5, 2020)
 - Respirators should be removed (doffed) and discarded before activities such as meals and restroom breaks.
- **Respirator Re-Use:** using the same respirator by one staff member for multiple encounters with different patients but removing it (i.e. doffing) after each encounter.
 - Data suggest limiting the number of reuses to no more than 5 uses per device to ensure an adequate safety margin.¹
 - One CDC example is to issue 5 respirators to each staff member. Each respirator is used on a day and stored in a breathable paper bag until the next week.
 - This can result in each staff member requiring a minimum of five respirators if they put on, take off, care for them, and store them properly each day. The respirators may need to be stored in the staff's trunk vs. the home.
 - The amount of time between uses should exceed the 72-hour expected survival time for COVID-19 virus.³ Healthcare staff should still treat the respirator as though it is still contaminated and follow the precautions.
- **Note that each re-use of N95 respirators requires 2 pair of gloves**, a clean pair of gloves when donning or adjusting a previously worn N95 respirator. Then discarding these gloves and performing hand hygiene after the N95 respirator is donned or adjusted and using a new pair of gloves for care.
- **Use of a cleanable face shield or facemask over the respirator** can extend respirator use as it reduces/prevents contamination of the N95 respirator.
- Reuse can also be extended by putting a surgical mask on the patient.

Staff reuse of N95 Masks with presumptive or confirmed COVID-19 patients: Two sources of information on reuse:

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- CDC: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/index.html> (April 22, 2020)
- NIOSH the National institutes of Occupational Safety <https://www.cdc.gov/niosh/topics/hcwcontrols/recommendedguidanceextuse.html> (March 27,2020)
 - Inpatient staff recommendations are based on wearing the same staff wearing N-95 masks patient-to-patient for several hours. Using inpatient criteria and applying it to the home, re-use is typically limited by
 - hygienic concerns (the respirator is contaminated with blood, respiratory or nasal secretions, or other patient bodily fluids, or
 - the respirator is damaged or crushed and no longer meets fit test requirements.

Discard: N95 respirators if:

- contaminated with patient blood, respiratory or nasal secretions, or other bodily fluids.
- obviously damaged or becomes hard to breathe through; or
- inadvertent contact is made with the inside of respirator.

NOTE: Respiratory pathogens on the respirator surface can potentially be transferred by touch to the wearer's hands, increasing the risk of causing infection through subsequent touching of the mucous membranes of the face -

Surgical Mask Use: Fluid-resistant, disposable, and loose-fitting protection devices that create a physical barrier between the mouth and nose of the wearer.

- Surgical masks do not seal tightly to the wearer's face, and therefore do not provide a reliable level of protection from inhaling infectious aerosols.
- Healthcare staff can continue to wear the same surgical mask until obviously soiled or torn-no longer providing protection.
- **Limited Supply strategies**
 - **Extended use** – the use of by one HCW on multiple patients (not recommended by the CDC but if adopted):
 - If the mask is removed for taking a break or completing a shift, it should be removed using appropriate technique and disposed of.
 - The potential number of hours of extended use would be dependent on local and individual factors such as humidity and shift length but in practice should be a maximum of 6 hours.
 - ***This emergency strategy (extended use) should be prioritized over reuse or other approaches. If applicable to the circumstances.***
 - **Reuse** of surgical masks would allow reprocessing and reusing the mask for one HCW to use on multiple patients with COVID-19 for a limited time (multiple shifts)

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- This method would be difficult with a typical surgical mask with ties as they quickly deteriorate.
- It is important to closely inspect the mask prior to each reuse due to the likelihood of quick deterioration.
- **No Surgical Masks Available:**
 - Potential Alternatives:
 - A face shield only or a combination of a cloth face mask and a face shield
 - **Note: Non-medical fabric masks are not considered PPE and their ability to protect HCW is currently unknown. Do not fall into a false sense of protection.**
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/non-us-settings/emergency-considerations-ppe.html> (May 5, 2020)

Surgical Masks – Shortage Fall 2020 Anticipated:

The FDA issued an umbrella emergency use authorization (EUA) for certain disposable, single-use surgical masks in response to concerns about insufficient supply and availability of such masks.

The EUA authorizes the emergency use of surgical masks that meet certain performance requirements for use in healthcare settings by health care personnel as personal protective equipment to provide a physical barrier to fluids and particulate materials to prevent exposure to respiratory droplets and large particles during surgical mask shortages resulting from the COVID-19 pandemic.

Surgical masks that have been confirmed by the FDA to meet the criteria under the EUA are included below in Appendix A as authorized surgical masks.

Note for health care personnel: <https://www.fda.gov/media/140895/download>

<https://www.fda.gov/medical-devices/coronavirus-disease-2019-covid-19-emergency-use-authorizations-medical-devices/personal-protective-equipment-euas#appendixasurgicalmasks> August 5

PPE Resource: Project N-95 – A national critical clearinghouse for personal protective and critical equipment. Organization conducts sourcing due diligence on all suppliers and products to accelerate supply access. <https://www.projectn95.org/>

Gowns:

Gowns should be worn for aerosol-generating procedures such as suctioning, nebulizer treatments, and other care activities where splashes and sprays are anticipated, and high-contact patient care activities that provide opportunities for transfer of pathogens to the hands and clothing of healthcare providers. Examples of high-contact patient care activities requiring gown use include dressing, bathing/showering, transferring, providing hygiene, changing linens, changing briefs, or assisting with toileting, device care or use, or wound care.

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- Re-usable gowns are available instead of disposable single use gowns – but also require the laundering process.
- **Using ANSI/AAMI PB70 standard disposal gowns:** Level 1 or 2 gowns (non-surgical isolation gowns) are recommended when there is low risk of contamination. Level 3 or higher for high risk of contamination.
https://www.cdc.gov/niosh/npptl/topics/respirators/disp_part/default.html (April 9, 2020)
- **Limited Gown Availability:**
 - Extended use: One staff member uses the gown with multiple patients with COVID-19 over a single shift. This emergency strategy should be prioritized over the use of alternatives.
 - Reusable gown should be laundered per the guidance at the following link:
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/non-us-settings/emergency-considerations-ppe.html> (May 5, 2020)
- **No Gowns Available: potential alternatives:**
 - Disposable aprons
 - Disposable laboratory coats
 - Washable patient gowns and/or laboratory coats
 - Combinations of clothing such as sleeve covers in combination with aprons and long sleeve patient gowns or laboratory coats.

Increase in Toxic Methanol Hand Sanitizers-FDA Site Lists Dangerous Products: The FDA is aware of reports of adverse events due to methanol contamination associated with hand sanitizer products.

- The FDA encourages health care professionals, consumers and patients to report adverse events or quality problems experienced with the use of hand sanitizers to FDA's [MedWatch Adverse Event Reporting](#) program (please provide the agency with as much information as possible to identify the product):
- **A current list of FDAs known methanol hand sanitizers by name can be found at:**
<https://www.fda.gov/drugs/drug-safety-and-availability/fda-updates-hand-sanitizers-methanol#products>

Q

Quality Reporting as of July 1, 2020

Home Health Quality Reporting

Temporary HH QRP Exception Due to COVID-19 PHE

In the March 27, 2020, Medical Learning network (MLN) memo, CMS announced temporary relief for HHAs and other providers in QRPs in response to COVID-19 PHE. These temporary exceptions due to this PHE lifted the requirements to report data to assist HHAs while they directed their resources toward caring for patients and ensuring the health and safety of patients and staff.

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Specific quarters for which HHAs are exempted from reporting of CAHPS® Home Health Survey and OASIS data for calendar years (CYs) 2019 and 2020 are listed below and **end on June 30, 2020:**

- October 1, 2019–December 31, 2019 (Q4 2019)
- January 1, 2020–March 31, 2020 (Q1 2020)
- April 1, 2020–June 30, 2020 (Q2 2020)

CAHPS Data Submission After July 1, 2020

The CAHPS® Home Health Survey will be required for the third quarter of 2020 and onward. The Home Health Care Consumer Assessment of Healthcare Providers and Systems (HHCAHPS) requirements for the Annual Payment Update (APU) run from April through the following March. For the CY 2022 APU, HHAs are required to submit monthly lists to their HHCAHPS- approved survey vendors for the months of April 2020 through March 2021. Due to the COVID exceptions, agencies are not required to submit data for the second quarter of 2020, which is April 2020 through June 2020. The HHCAHPS-approved survey vendors are required to submit survey data on the third Thursday in the months of January, April, July, and December. The HHCAHPS- approved survey vendors are required to submit HHCAHPS survey data on July 16, 2020, and onward.

OASIS AND HH QRP

Starting with Q3 that begins July 1, 2020, CMS expects providers to report their quality data, which means that for all assessment time points with a **M0090 date of July 1, 2020, or later**, CMS expects the assessments to be submitted following the QRP requirements. CMS continues to waive the 30-day OASIS submission requirement. Delayed submission is permitted during the PHE; however, the submission must be completed before submitting a final claim.

If an organization submitted data for Q1 and Q2 2020 to include the data for public reporting starting with Q3 2020 data, we will not include any of those data for purposes of calculating whether you meet HH QRP Requirements impacting CY 2022 payments.

<https://www.cms.gov/files/document/hhqrp-covid19phetipsheet-july2020.pdf>

PHE Quality Reporting Exemptions on Public Reporting – Sept 2020

CMS Strategy for Excepted Data

For Q1 2020 and Q2 2020, providers were excepted from data submissions. For this reason, CMS will hold the data constant (i.e., freeze the data) following the October 2020 refresh. The affected Compare site refreshes that were scheduled to contain CY 2020 COVID-19 data (Q1 2020, and Q2 2020) include:

- January 2021
- April 2021
- **July 2021**
- **October 2021**

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After the October 2021 refresh, CMS plans to resume public reporting. Figure 2 provides a summary.

Quarter Refresh	Home Health Compare OASIS – Assessment-Based Measures Claims-Based Measures	Home Health Compare CAHPS®
October 2020	Normal refresh (includes Q4 2019 data)	Normal refresh (includes Q4 2019 data)
January 2021	Freeze	Freeze
April 2021	Freeze	Freeze
July 2021	Freeze	Freeze
October 2021	Freeze	Freeze
January 2022	Public reporting resumes*	Public reporting resumes*
April 2022	Normal refresh	Normal refresh

***To account for missing PHE -excepted data (Q1 2020 and Q2 2020) when public reporting resumes, any potential change in measure calculation methodology will be subject to notice-and-comment rulemaking.**

<https://www.cms.gov/files/document/hhgrp-pr-tip-sheet081320final-cx-508.pdf>

Home Health Flexibilities related to QRP due to the PHE

CMS is delaying the release of the updated version of OASIS needed to support the Transfer of Health (TOH) Information quality measures and new or revised Standardized Patient Assessment Data Elements (SPADES) to provide maximum flexibilities for providers of HHAs to respond to the COVID-19 PHE. The release of the updated version of the OASIS will be delayed until January 1 of the year that is at least 1 full calendar year after the end of the COVID-19 PHE.

CMS is providing relief to HHAs on the timeframes related to OASIS transmission through the following: (1) extending the 5-day completion requirement for the comprehensive assessment to 30 days; and (2) waiving the 30-day OASIS submission requirement. Delayed submission is permitted during the PHE. We are now allowing 30 days for the completion of the comprehensive assessment. HHAs must submit OASIS data prior to submitting their final claim to receive Medicare payment.

<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/Home-Health-Quality-Reporting-Training>

Hospice Quality Reporting

In the March 27, 2020, Medicare Learning Network (MLN) memo, CMS announced temporary relief for hospices and other providers in quality reporting programs in response to COVID-19 PHE. These temporary exemptions due to this PHE lifted the requirements to report data to assist hospice providers while they directed their resources toward caring for their patients and ensuring the health and safety of patients and staff. Specific quarters for which hospices are exempted from reporting of CAHPS®

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Hospice Survey and HIS assessment and discharge data for calendar years (CYs) 2019 and 2020 are listed below and end on June 30, 2020:

- October 1, 2019–December 31, 2019 (Q4 2019)
- January 1, 2020–March 31, 2020 (Q1 2020)
- April 1, 2020–June 30, 2020 (Q2 2020)

CAHPS Submission after July 1, 2020

The CAHPS® Hospice Survey will start July 1 with July deaths.

HIS Data Submission

All new HIS admission records and any HIS discharge records that occur on or after July 1, 2020. Timely submission and acceptance of HIS data are unchanged. Data submission must occur for all patients within 30 days of admission and discharge at least 90 percent of the time. It is recommended that hospices submit HIS data within 14-days to ensure acceptance by the 30-day deadline.

The CY 2020 data used for meeting the HQRP requirements include July 1 through December 31, 2020, as Q1 and Q2 of 2020 (January 1-June 30, 2020) were exempted due to the COVID-19 PHE. This means that even if you submit HIS and CAHPS® Hospice Survey data for Q1 and Q2 2020, we will not include any of that data for purposes of calculating whether you meet HQRP requirements impacting FY 2022 payments.

<https://www.cms.gov/files/document/hqrpcovid-19-phetipsheetjuly-2020508-compliant.pdf>

Impact of Quality Reporting Exemptions on Public Reporting – September 2020

CMS Strategy for Exempted Data the Affected Compare site refreshes that were scheduled to include CY 2020 COVID-19 exempted data (Q1 2020 and Q2 2020) include:

- February 2021
- May 2021
- August 2021
- November 2021

For these refreshes, CMS will hold the data constant (i.e., freeze the data). This means that following the November 2020 refresh, the data publicly reported will be the same data as the November 2020 data. Stated another way, the publicly reported data will be frozen through the November 2021 refresh. After the November 2021 refresh, CMS plans to resume public reporting. Figure 2 provides a summary.

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Quarter Refresh	Hospice Compare HIS- Assessment Based Measures	Hospice Compare CAHPS®
November 2020	Normal refresh (includes Q4 2019 data)	Normal refresh (includes Q4 2019 data)
February 2021	Freeze	Freeze
May 2021	Freeze	Freeze
August 2021	Freeze	Freeze
November 2021	Freeze	Freeze
February 2022	Public reporting resumes*	Public reporting resumes*
May 2022	Normal refresh	Public reporting resumes*
August 2022	Normal refresh	Public reporting resumes*
November 2022	Normal refresh	Public reporting resumes*
February 2023	Normal refresh	Public reporting resumes*
May 2023	Normal refresh	Normal refresh

***To account for missing PHE -excepted data (Q1 2020 and Q2 2020) when public reporting resumes, any potential change in measure calculation methodology will be subject to notice-and-comment rulemaking.**

<https://www.cms.gov/files/document/hqrp-pr-tip-sheet081320final-cx-508.pdf>

Quality Reporting Pandemic Considerations:

Current care practices implemented for Home Health and Hospice agencies to minimize virus exposure have potential to impact patient responses related to the CAHPS survey and clinician responses related to the OASIS or HIS data.

Examples of these practices include the use of PPE, shortening the visit length to reduce exposure time, use of telecommunication for the provision of care, and staffing shortages.

Considerations:

- PPE
 - use results in a barrier and the loss of “human touch” which facilitate relationship building
 - The loss of connection could impact patient answers to CAHPS questions such as: Were you listened to? Were you treated with respect? Did you receive confusing information?
 - Potential solutions:

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- Consider methods of care delivery that facilitate relationship building. If a patient is stressed overuse of telecommunications, the ability to connect clinician to patient is hindered
- Allowing a patient/caregiver to “see” the face of their clinician through a window or by a picture may facilitate the “human touch”
- Minimizing length of visits
 - Shortening the length of visits requires alternate methods to provide the care
 - Using a combination of telecommunication and in-person visits to address patient needs will help ensure those needs are being met
 - Potential solutions
 - Process to increase effectiveness of the shorter visit
 - Possibly a checklist to stay on track
 - Phone calls prior to or following the visit to obtain or verify information that does not require in-person contact
 - Development of educational materials for patient review with the education conducted by telecommunication
- Use of Telecommunication for care delivery
 - Finding the optimum platform requires being able to validate the ability to conduct a comprehensive, effective visit that will meet the patient’s needs
 - The same platform may not work for everyone.
 - Coordination of care provided remotely, and care provided in-person is key to ensure quality of patient care
 - Potential solutions
 - Standardized written instruction for participating in a remote visit
 - Encourage patients to have ready items needed for the remote visit
 - Examples include supplies to conduct blood glucose testing, any new or changed medications, any logs that are being maintained by the patient.
 - Needs identified during a remote visit require evaluation of whether an immediate in-person visit is needed or not
 - Communication is key if the agency is unable to maintain consistent care providers for the patient. Being able to reflect coordination of the patient’s care will emphasize the “team” caring for the patient.

During this challenging time, it is necessary to amend processes to provide quality care within the confines of infection control safety, and to also evaluate how those alternate processes may impact the patient’s quality of care, their perception of their care experience and your publicly reported quality measures. Evaluate your processes broadly and think out of the box but within the Conditions of Participation.

S

Staff Stress and Compassion Fatigue:

Healthcare Personnel Coping with Stress During the COVID-19 Pandemic

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Providing care to others during the COVID-19 pandemic can lead to stress, anxiety, fear, and other strong emotions. How you and your team cope with these emotions can affect your well-being, the care you give to others while doing your job, and the well-being of the people you care about outside of work.

In a Pandemic the Issue is Duration: Experiencing or witnessing life threatening events impacts everyone differently. People may experience clinically significant distress or impairment, such as acute stress disorder, PTSD, or secondary traumatic stress (also known as vicarious traumatization). Compassion fatigue may also result from chronic workplace stress and exposure to traumatic events during the COVID-19 pandemic.

<https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/managing-stress-anxiety.html> July 1, 2020

What You Can Do - First Identify It: Recognize the symptoms of stress

- Feeling irritation, anger, or denial
- Fear and worry about your own health and the health of your loved ones, your financial situation or job, or loss of support services you rely on
- Feeling uncertain, nervous, or anxious
- Feeling helpless or powerless
- Lacking motivation
- Feeling tired, overwhelmed, or burned out
- Feeling sad or depressed
- Having trouble sleeping
- Having trouble concentrating

Learning to Manage Your Reactions:

Focus on 4 Core Components for Self-Management:

- 1) adequate sleep and rest
- 2) good nutrition, eat healthy meals,
- 3) regular physical activity and
- 4) active relaxation spend time outdoors relaxing when you can.

Talk to Yourself!

- Remind yourself that you are not the only one in an unusual situation with limited resources
- Identify and accept those things which you do not have control over.
- Recognize that you are performing a crucial role in fighting this pandemic and that you are doing the best you can with the resources available. you share a sisterhood and brotherhood with caregivers like yourself across the world.

Take Control of Aspects of Your Daily Life:

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- Keep a consistent daily routine when possible — as similar as you can to your schedule before the pandemic.
- Take breaks during your day to rest, stretch, or check in with *supportive* coworkers, friends, and family.
- Do things you enjoy during non-work hours – the importance of taking time away from work.
- Take breaks from watching, reading, or listening to news stories, including social media. Hearing about the pandemic repeatedly can be upsetting and mentally exhausting, especially since you work with people directly affected by the virus.
- Practice good daily hygiene-how like or unlike your daily routine are you now? Hair, shave, dress?
- ‘Wash Up’ at the end of the day, to ‘put away’ your work.
- Create individual ceremonies or rituals that allow you to focus your thoughts on letting go of stress or honoring a memory of something positive; seek moments of ‘joy’.
- Practice your spiritual beliefs, anyone can pray
- Engage in mindfulness techniques, such as breathing exercises and meditation. (there are apps for this!)
- If you feel you or someone you know may be misusing alcohol or other drugs (including prescriptions), ask for help or offer help.
- If you are being treated for a mental health condition, continue with your treatment, and talk to your provider if you experience new or worsening symptoms.

If concerned that you or someone in your household or you work with may harm themselves or someone else here are additional resources. If you share these, you never know when someone may use it.

- [National Suicide Prevention Lifeline](#)
 - Toll-free number 1-800-273-TALK (1-800-273-8255)
 - The [online Lifeline Crisis Chat](#) is free and confidential. You’ll be connected to a skilled, trained counselor in your area.
- [National Domestic Violence Hotline](#)
 - Call 1-800-799-7233 and TTY 1-800-787-3224
- Disaster Distress Hotline (SAMSHA) (Created for those working during disasters).
 - Call 1-800-985-5990 or text TalkWithUs to 6674

Other sources American Institute of Stress <https://www.stress.org> has additional resources.

Staff Anxiety: Leadership, Manager and Supervision -What you can do:

Expect staff to demonstrate increased anxiety as the PHE continues, if only as a natural reaction to a sustained period of no predictability that can or does impact all parts of our lives. *As leaders you can take action to make a difference for your team! The following is excerpted studies of the impact of the pandemic on health care staff here in the US and the UK.*

- 1) Your leadership goal – reduce ambiguity for staff – they just want to know

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- a. Double down on communication
 - b. Make it open and honest – their concern is financial security, physical safety, etc.
 - i. Tell them where the company is at, you are going forward, will expect and accept COVID 19 patients- yes or no and only if you have the supplies to care for them and for your team (recommended guideline)
 - ii. You are expected to keep wearing PPE. Tell them you have their backs, you have PPE
 - iii. Tell them that checking in with the symptom log is still expected, now it is critical to tracking
 - c. Tell them what you learned from these seven months, reaffirm what worked and what will you do the same going forward. If something did not work, form the staff group to address remember engaging folks offer hope which is based on taking action.
 - d. Clearly communicate the rationale behind changes you make going forward.
- 2) Acknowledge that you know that their job is stressful, and **they are** essential workers/heroes. Underscore the value of what they do -they let people stay at home-where we all want to be.
- a. What can you do to empower them, give them control over elements of what they do?
 - b. Remind employees to take mental and physical breaks, exercise and participate in other non-work-related activities to reduce anxiety.
- 3) What roadblocks can you remove? They may have ideas.
- 4) Ensure that your team knows about mental health coverage as part of their benefits or access to these in the community (Noted at the end of the preceding information).
- a. If you have a wellness program use it for self-care, self-help virtual sessions with experts. Your goal is to reduce the stigma for asking for help.
 - b. You may need to talk to some employees about seeking guidance.
- 5) So, what else is effective-in addition to clear communication about what is going on:
- a. Show how you care about the individual employee.
 - b. Encourage supervisors and your management to check in with the team on about things other than work.
 - c. Find more way to express appreciation.
 - d. You are responsible to set a tone of respect
 - e. Resolve conflicts quickly.

Folks need to know right now that some one cares about them and what they do.

Staff Work Status and Antibody Testing: The CDC advises that an antibody test should NOT be used to determine if someone can return to work: <https://www.cdc.gov/coronavirus/2019-ncov/lab/resources/antibody-tests.html> (May 28, 2020)

Staff COVID 19 Processes to Address the Following:

- Monitoring staff health status for symptoms of COVID 19 symptoms, <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html> May 13, 2020

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- Staff Feeling Ill go home and contact a doctor for care and/or testing. Per CDC.
- Designate who and how patients, families and other staff are notified that a staff member is ill, and what action they should take awaiting information is COVID 19 positive.
- Advise patients and caregivers how you monitor staff health status and ask their cooperation in telling you if any member of the household or visitor has confirmed COVID-19 or is awaiting results.

Staff Exposure: Restricting an Employee from Work

- CDC provided guidance for asymptomatic HCP who were exposed to individuals with confirmed COVID-19. Higher risk exposures involve exposure of HCP eyes, nose or mouth to material potentially containing SARS-Cov-2, especially if the interaction involved aerosol-generating procedures.
- **HIGH RISK EXPOSURE** - HCP who had prolonged-(15 min or more or 15 minutes over a 24-hr. period), close contact (within 6ft) with a patient, visitor or HCP with confirmed COVID-19 AND did not wear appropriate PPE which would include respirator or face mask, eye protection, or HCP not wearing all recommended PPE while performing an aerosol-generating procedure
 - Exclude from work for 14 days
 - Advise HCP to self-monitor for fever or other symptoms of COVID-19
 - Any HCP who develops symptoms should arrange for medical evaluation and testing.
- **LOWER RISK EXPOSURE** – any HCP who had exposure without the high risk noted above
 - No work restrictions
 - Continue wearing facemask for source control while at work
 - Do not report to work if ill
 - Any HCP who develops symptoms consistent with COVID-19 should immediately self-isolate and arrange for medical evaluation and testing.

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html#4> (May 29, 2020)

T

Telehealth:

Use of telehealth by Medicare Certified home health agencies

- **A PRN telecommunication visit order** is permissible if it is accompanied by a description of the patient's medical signs and symptoms requiring the visit and a specific limit on the number of those visits to be made before an additional physician or allowed practitioner order is needed. Orders for care may indicate a specific range in frequency of visits to ensure that the most appropriate level of services is furnished. If a range of visits is ordered the upper limit of the range is considered the specific frequency.
- **Comprehensive Assessments and Updates to the Comprehensive Assessment**

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- Audio only or two-way audio-video telecommunication comprehensive assessment or an update to the assessment can be used if it is part of the patient's plan of care. Telecommunications cannot substitute for in-person visits as ordered on the plan of care.
- Plan of care should be modified as the type of visits change, noting which visits will be made in person and which visits will be conducted via telecommunication technology
- Expectations:
 - **Education** of patients as to the processes the agency has in place to protect patients as well as home care staff.
 - Not everything can be accomplished per telecommunication when skilled care is required.
 - The agency should work closely with the patient to determine what would reassure them that in-person visits with the agency staff are safe.
- If the **patient continues to refuse** any in-person visits as per the plan of care, the agency will have to determine if the patient's medical, nursing, rehabilitation and social needs can be met in their place of residence. Per §484.60

<https://www.cms.gov/files/document/03092020-covid-19-faqs-508.pdf> (page 57) Updated 6/2/2020

- **Hospice:** Hospice providers can provide services to a Medicare patient receiving routine home care through telecommunications technology (e.g., remote patient monitoring; telephone calls (audio only and TTY); and 2-way audio-video technology), if it is feasible and appropriate to do so. Only in-person visits are to be recorded on the hospice claim.
 - Face-to-face encounters for purposes of patient recertification for the Medicare hospice benefit can now be conducted via telehealth (i.e., 2-way audio-video telecommunications technology that allows for real-time interaction between the hospice physician/hospice nurse practitioner and the patient).

<https://www.cms.gov/files/document/covid-hospices.pdf> (5/15/2020)

Hospice FAQ Telehealth Answers and Expectations:

- Initial and Comprehensive Assessments
 - Due to the role of the assessment as the foundation of the plan of care and crucial to establishing the hospice-patient relationship, the expectation is that in most situations, the initial and comprehensive assessments would be done in person. Especially for assessment of skin/wound care, uncontrolled pain/symptoms, effective teaching of patient/caregiver medication administration, etc.)
 - It would be up to the clinical judgment of hospice as to whether such technology can meet the patient's/caregiver's/family's needs and the use of technology should be included on the plan of care for the patient and family.

<https://www.cms.gov/files/document/03092020-covid-19-faqs-508.pdf> Page 68 (Updated 6/2/2020)

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- **Medicaid and Private Insurance**
 - The ability to bill for home health/hospice is dependent upon the state flexibilities and the program itself. Research should be conducted to determine when telehealth can be provided and if it is billable.
- **Paid telehealth visits by licensed practitioners.** As of March 6, 2020, Medicare pays for office, hospital visits or visits to a patient's home furnished via telehealth. These visits can be conducted by doctors, nurse practitioners, clinical psychologists, licensed clinical social workers, and other licensed practitioners.
<https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet> (March 17, 2020)

Additionally, the HHS Office of Inspector General (OIG) is providing flexibility for these practitioners to reduce or waive cost-sharing for telehealth visits paid by federal healthcare programs.

Telehealth options:

- **Types of telehealth communications:**
 - Telehealth: refers to a broader scope of remote health care services than telemedicine as in addition to remote clinician services between a provider and patient/client, it also refers to remote non-clinical services such as clinician to clinician consults, patient education services, and interprofessional care team communications
 - Telemedicine: practice of delivering medicine using technology to deliver care at a distance. A physician/clinician in one location uses a telecommunications infrastructure to deliver care to a patient at a distant site. This is a subset of telehealth
 - Remote patient monitoring refers to using technology to gather patient data outside of the traditional health care setting to monitor a patient's condition while they are at home. This is also a subset of telehealth and includes such devices as glucometers and digital scales
 - mHealth: is abbreviated for mobile health and refers to the subset of telehealth that uses mobile technologies. Examples include apps and peripheral devices designed for use on smart phones and tablet. Can be used for videoconferencing, gathering patient data, or providing patient education.

Getting Started:

- What is the state requirement related to patient consent to use telehealth?
 - If verbal consent is obtained, a witness is appropriate, and the consent should be documented within the clinical record.
- What payers does the organization provide service under who may allow telehealth billing?
- How will telehealth be provided?
- Develop protocols for the delivery of telehealth visits
 - How will the type of interaction be determined?
 - How will education be provided to patients/family related to the visits?

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- Who is responsible for scheduling and does a link need to be sent?
- How will the visit documentation be done?
- How will emergency/on call needs be addressed?

Virtual Visit Etiquette

- Start the visit by confirming the patient/family can see and hear. Make a clear verbal transition to the start of the clinical visit. Such as “How are you doing?”
- Let the patient/family know they can interrupt if they need to pause or adjust during the visit.
- Confirm that you will call them if sound, or video is lost during the visit
- For the 1st visit provide an overview of the visit.
 - The amount of visit time.
 - What is to be accomplished during the visit
 - Discuss any concerns or symptoms being experienced
 - Review of medications and need for refills
 - The plan for the next visit
- If responding from home, find a quiet location with a neutral background and good lighting
- Always dress appropriately, and wear plain clothes as patterns can cause nausea from the screen
- Speak slowly and clearly, and check every so often to ensure that you are being heard
- Remember to look at the camera on your own device (not at the screen that has the patient’s video)
- Call wrap up: Let the patient/family know when 5-10 minutes is left, and ask if there is information, they want to make sure to cover.
- End the visit by summarizing what you heard, what the plan is, reviewing medication needs.
 - Inform the patient if the next visit will be a virtual or in-person visit.

Telehealth Resources:

- Northwest Regional Telehealth Resource Center
<https://www.nrtrc.org/covid-19-detail-117>
<https://www.nrtrc.org/content/blog-post-files/NRTRC-Telehealth-Start-Up-Checklist-handout-4-15-2020.pdf>
- Health and Human Services
<https://telehealth.hhs.gov/providers/getting-started/>
- Mid Atlantic Telehealth Resource Center
<https://www.matrc.org/matrc-telehealth-resources-for-covid-19/>

HIPAA and Telehealth: The HHS Office for Civil Rights (OCR) can waive penalties for HIPAA violations against health care providers serving patients in good faith through everyday communications technologies, such as FaceTime or Skype, during the COVID-19 federal PHE.

<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html> (March 23, 2020)

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Tips for Success:

- Look for changes in care provision practices to evaluate any potential negative effects on patients
- Ensure plans of care include telecommunications if staff are using.
- Ensure orders are obtained to reflect any changes in care including the use of telecommunications.
- If utilizing telecommunication, a checklist can aid the clinician to remember the needs of the visit as they provide care.

V

Designated COVID 19 Vaccinator Status as a Community-Based Organizations

- An HHA or hospice do need to take any action to administer and bill the COVID-19 vaccination, either through individual claims or roster bill, you are considered a mass immunizer. You will need to apply and be approved by your state or local health department to receive the vaccine. Contact the Immunization Program Manager now at your health department.
- Medicare payment for administering vaccinations:
<https://www.cms.gov/medicare/covid-19/medicare-covid-19-vaccine-shot-payment> and,
<https://www.cms.gov/files/document/covid-home-health-agencies.pdf> (Nov 5 2020)
- **Other Providers becoming Vaccinators:** such as home care (private duty) and home infusion can enroll, the CMS mass immunizer enrollment process is at <https://www.cms.gov/covidvax>

CDC Updates and Resources for Vaccinators

- **CDC Toolkit and updated storage and administration information for each vaccine.**
<https://www.cdc.gov/vaccines/hcp/admin/storage/toolkit/index.html>
- **CDC COVID 19 Vaccine Training Module**
<https://www2.cdc.gov/vaccines/ed/covid19/>
- **How is the vaccination paid for:** Vaccine doses purchased with U.S. taxpayer dollars will be given at no cost. Vaccination providers can charge administration fees for giving the shot, which is not included, and you may need to pay for this charge.

Vaccination providers can get this fee reimbursed by the patient's public or private insurance company or, for uninsured patients, by the Health Resources and Services Administration's Provider Relief Fund external icon.

Jan 7 2021: Questions Preparing for Vaccine Roll Out to Your Staff and Patients:

The time has finally arrived for vaccination. How are you positioning vaccination with your staff? Do you have expectations of how staff will respond to patients' questions about being vaccinated?

- 1) Are you making a recommendation to your staff about being vaccinated?

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- 2) Do you have a forum or means for staff to ask questions and get answers, as well as bring questions to you that patients have asked and they would like answers?

Consider a brief education piece to provide to patients and to staff, so that there is a common response to questions. One such CDC pdf is: https://www.cdc.gov/coronavirus/2019-ncov/vaccines/pdfs/321466-A_FS_What_Expect_COVID-19_Vax_Final_12.13.20.pdf

Another good resource can be found at: <https://www.cdc.gov/vaccines/covid-19/hcp/answering-questions.html> November 2, 2020

THE COVID-19 Vaccine and Vaccinations

What Your Team Needs to Know about COVID-19 Vaccination:

A one- page summary for use by your staff is available on the CHAP education website. Your team has great influence on people’s choices to be vaccinated, especially patients as vulnerable individuals.

[Click here to access document :What you Should Know about COVID Vaccination](#)

FDA Approval of 2 Vaccines for Emergency Use Authorization:

- Pfizer FDA approves EUA for the 2-dose Pfizer vaccine.
- Moderna: FDA approves EUA for the 2 dose Moderna vaccine
- More vaccines may request approval by the FDA.

Emergency Use Authorization (EUA) Approval: What It Means

- **Post vaccine EUA approval reporting:** A EUA approved vaccine must has a plan for active follow-up for safety, including deaths, hospitalizations, and other serious or clinically significant adverse events to rapidly detect safety problems.. Follow-up includes VAERS and monitoring Medicare claims data.
- **Vaccine recipients are informed:**
 - that the FDA has authorized the EUA,
 - the extent of unknown benefits and risks,
 - that they have the option to *accept or refuse* the vaccine, and,
 - he FDA Factsheet issued with each vaccine that is posted on the FDA website <https://www.fda.gov/emergency-preparedness-and-response/mcm-legal-regulatory-and-policy-framework/emergency-use-authorization#abouteuas> Dec 9 2020

COVID 19 Vaccination Access Priority:

The CDC has made vaccination access recommendations to the States, the States have the final determination of distribution and access to the vaccine.

Immunization Plans Draft Executive Summaries and access plans for the population.

<https://www.cdc.gov/vaccines/covid-19/covid19-vaccination-guidance.html> Dec 6, 2020

FAQs: COVID 19 Conference Calls Updated January 7, 2021

Information About COVID 19 Vaccines for Staff and for Patients:

- **The Safety of COVID-19 Vaccines:**

The U.S. vaccine approval system ensures that vaccines are as safe as possible. Each vaccine must demonstrate that the benefits outweigh the risks. Find out more about how vaccine safety is ensured at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety.html> Dec 10, 2020

CDC has developed **v-safe**, to increase the ability to rapidly detect safety issues with COVID-19 vaccines. V-safe is a smartphone-based, after-vaccination health checker for people who receive COVID-19 vaccines. When you receive your vaccination, you find out how to register and you can report symptoms and be reminded of your next dose.



<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety/vsafe.html> Dec 10, 2020

CDC PDF Education material for staff and patients:

https://www.cdc.gov/coronavirus/2019-ncov/vaccines/pdfs/321466-A_FS_What_Expect_COVID-19_Vax_Final_12.13.20.pdf

- **A vaccine may require more than one dose to get the most protection. You must take the 2nd dose to get the full COVID-19 protection. You may not be protected until 1-2 weeks after the 2nd shot.**
 - Pfizer vaccine - 2 doses and a second shot 3 weeks (21 days) after your first shot.
 - Moderna vaccine: 2 doses, the second shot is one month (28 days) after your first shot.
 - The same vaccine must be used for both doses.
 - **Jan 7 2021: The FDA has not approved receiving only 1 dose to 'stretch' access to the vaccine.**
- **What to Expect When You Receive the Vaccine:** You should receive a vaccination card or printout that says which COVID-19 vaccine you received, the date you received it, and where you received it. Also, each COVID-19 vaccine has its own fact sheet with information about side effects, and when your second shot is needed. You should receive this on paper or electronically when you receive your first shot.
- **Common Side Effects:** Side effects are normal signs that your body is building protection and responding to the vaccine. These side effects should go away in a few days. Note that side effects may occur after the first or second dose.

**FAQs: COVID 19 Conference Calls
Updated January 7, 2021**

Common side effects:

Pain at the injection site	Fever	Tiredness
Injection site swelling	Chills	Headache

- **Important: Masking and Social Distancing Continues even after Vaccination** until more of the population is vaccinated.

Jan 7 2021: Pfizer and Moderna use new technology: both are mRNA vaccines:

- Most vaccines use weakened or inactive parts of a virus to stimulate the body's immune response to create antibodies and kill the virus.
- The Pfizer and Moderna vaccines do not contain a live virus, and do not have the risk of causing the disease. These vaccines use what is called mRNA that triggers the process in our cells to build immunity to the virus that causes COVID-19. This approach has been studied for over a decade.

<https://www.cdc.gov/vaccines/covid-19/hcp/mrna-vaccine-basics.html> November 24, 2020

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Waivers:

Types of 1135 waivers are issued during the Public Health Emergency (PHE). All waivers are effective March 1, 2020 and end effective when the federal Public Health Emergency ends.

- **Federal Blanket Waivers:** Publicly announced by CMS and applicable to all providers by Medicare benefit type. Examples include the home health and hospice waivers.
- **State Medicaid waivers:** States may request waivers of Medicaid regulations by contacting CMS. Over 48 states have requested waivers. To the following website, find your state, click on what is a letter to the state, scroll past the letter and you will find the details of the waiver.
<https://www.medicaid.gov/state-resource-center/disaster-response-toolkit/federal-disaster-resources/entry>

Please continue to join CHAP on our Weekly COVID 19 Conference Calls in 2021:

- **Thursdays 3 -4:00 PM ESDT Call in: 646-307-1479, or toll-free 877-304-9269 • Participant code: 246854#**

Thank you for your dedication and be well!