



# Monthly Office Hours – Policy Enactment July 13, 2023

The Adult Day Center Model Infection Control and Prevention Policies grant was awarded to LeadingAge Virginia in 2022 from the Virginia Department of Health Office of Epidemiology with funding from the CDC under Federal Award Identification Number NU50CK00055.

# Logistics – Zoom Meeting



To ask a question, click on the **Q&A** icon.

Raise your hand if you want to verbally ask a question.

Resources from today's session will be posted in **Chat**.

You may adjust your audio by clicking Audio Settings.

You have been automatically muted with video turned off.





## Your HQI Team



**Sheila McLean** MBA, LNHA, CPHQ Project Director



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**Felicity Wood**MS, LNHA
Consultant





# **Project Foundations**

### **Project Funding Source**

LeadingAge Virginia has received funding from the Centers for Disease Control and Prevention (CDC) through the Virginia Department of Health (VDH) to develop infection prevention and control policies for adult day centers in Virginia. LeadingAge Virginia and Health Quality Innovators (HQI) have partnered on this grant project.

### **Goals of the Project**

- Develop policies that reflect current best practices for infection prevention and control (IPC) in adult day centers (ADCs) and that are in accordance with state regulations/standards
- Provide policies that can be customized to meet the unique needs of all licensed ADCs in Virginia
- Support implementation of these policies

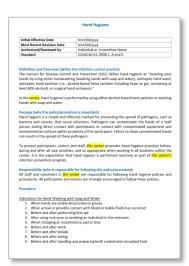
### **What Project Success Looks Like**

- Consistent IPC policies
- Increased capacity to prevent/control infections
- Preparedness to respond quickly and appropriately to disease threats
- Decreased risk of ADC-acquired infections





# Progress to Date – 8 Policy Templates Finalized



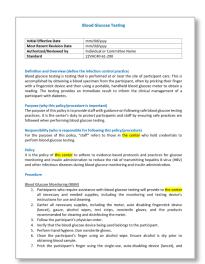
**Hand Hygiene** 

Respiratory Hygiene and Cough Etiquette		
Initial Effective Date	mm/dd/yyyy	
Most Recent Revision Date	mm/dd/yyyy	
Authorized/Reviewed by	Individual or Committee Name	
Standard	22VAC40-61-190	
this center, the use of respirat taff, visitors and volunteers to control measures should be implemented. They should be incorp tandard Precaudion Purpose (why this policy/proced the policy/proced procedure). Purpose (why this policy/proced procedure). Purpose (why this policy/procedure) purpose (why this policy/procedure) purpose (why this policy/procedure) purpose (why this policy/procedure). Or procedure participants, visitors critically and procedure purpose the purpose pur	sures and strategies are meant to protect participates and stall time who may have undersoon effections with signs with any sign or symptoms of infection should not enter the and staff, the sereing romotes respiratory hygiene and cough and staff, the sereing romotes respiratory hygiene and cough sent when participating in and working in all bostions within that respiratory hygiene is performed routinely as part of the great.	
	espiratory infections, it is the policy of this center to adhere to and Prevention (CDC) recommendations for Respiratory Hygiene re facilities.	
Visual Alerts     a. Post visual alerts	in appropriate languages (e.g., signage, posters) at center her strategic places within the center (e.g., common areas, dining	
entrances and oth		

Respiratory Hygiene and Cough Etiquette

Initial Effective Date	mm/dd/yyyy
Most Recent Revision Date	mm/dd/vyw
Authorized/Reviewed by	Individual or Committee Name
Standard	22VAC40-61-290 B, D, and E
Personal protective equipment combination to protect mucous	the infection control practice) ( PPE) includes a variety of barriers used alone or in membranes, skin and clothing from contact with pathogens. te protection (including facemasks, goggles, and face shields)
	cted not only by direct care staff to prevent the transmission who handles food, cleaning chemicals and hazardous agents lets (SDS) for protection.
selection and use of PPE is an ele	dure is important) slood, body fluids, or potentially infectious materials. Proper ment of Standard Precautions and an important strategy for athogens to participants, staff and visitors.
All blood, body fluids, sec rashes), and mucous mer     PPE selection and use she exposure anticipated, dur	ns that apply to selection and use of PPE: retions, excretions (except sweat), non-intact skin (including bibranes may contain transmissible pathogens. bud be based on the type of interaction/task and the type of abality, appropriateness for the task and fit, regardless of a r confirmed infection status.
For the purpose of this policy, the	ile for following this policy/procedure) term "staff" will be used to refer to any individual providing food, and also anyone who handles cleaning chemicals and
	and staff, this center promotes the proper use of PPE. It is the is performed when indicated as part of this center's infection
	(i.e., donning and doffing) of PPE during participant care

Selection and Use of Personal Protective Equipment (PPE)



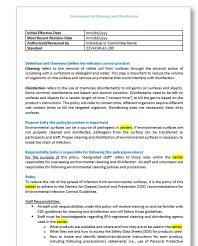
Blood Glucose Testing



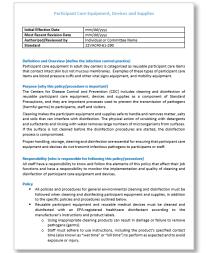
# Progress to Date – 8 Policy Templates Finalized

Auditing, Monitoring and Compliance Initial Effective Date mm/dd/yyyy Most Recent Revision Date mm/dd/yyyy Definition and Overview (define the infection control practice An effective infection prevention and control (IPC) program includes auditing, monitoring, and compliance as a practice. Implementing these methods properly can help organizations remain compliant with federal and state rules and regulations while strengthening internal operations and procedures. Ongoing auditing and monitoring efforts are imperative for operational success in an infection prevention and control program. Auditing is a systematic review comparing actual practice to a practice described in a standard. Audits help uncover where practices differ from what's described by a standard and/or center policy. An audit can include inspection of the physical site, a review of workplace infectio prevention practices, an assessment of staff knowledge and application of infection prevention principles. Audit results can benefit center staff by identifying practices needing improvement. Monitoring is a continuous method of observing a process to detect compliance and risk issues Ongoing monitoring is used to understand where practice may be inconsistently performed or where practice does not follow center policy. Auditing and monitoring are not intended to be punitive for employees being observed, but rather highlight where improvements in individuals' behavior can strengthen the center's infection prevention efforts Purpose (why this policy/procedure is important) The purpose of this policy is to provide staff with guidance on auditing their center's IPC program Responsibility (who is responsible for following this policy/procedure) For the purpose of this policy, "designated staff" refers to those roles within the center who are responsible for auditing and monitoring. All other staff and volunteers in the center are responsible for following auditing, monitoring, and compliance policies and procedures as it pertains to their individual roles To ensure adherence to the center's IPC program, it is the policy of this center to follow evidencebased protocols and practices for auditing and monitoring

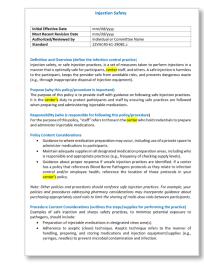
> Auditing, Monitoring and Compliance



Environmental Cleaning and Disinfection



Participant Care
Equipment, Devices
and Supplies



Injection Safety





# Summary from June Office Hours

### **Strategy and Policy Development**

What is strategy and policy development?

- Planning how to develop, draft and prepare for policy implementation
- Helps make the policy "actionable"
- Supports a culture of compliance

Access the June Office Hours
Slides and Recording







# **Polling Question**

# Who is involved in the policy approval process at your adult day center?

- 1. Board members and executive leadership
- 2. Management team after review with staff members
- 3. Whomever writes or revises the policy
- 4. All the above







# Policy Enactment: Why Is It Important?

### Virginia Adult Day Center Model Infection Control and Prevention Policies Grant Policy Enactment Tip Sheet

#### What is Policy Enactment?

Policy enactment is getting official permission to implement a policy by following an adult day center's (ADC) approval process.

#### Why is Policy Enactment Important?

Authorization for use of the policy grants the center the approval to conduct operations in the manner written or described by the policy. Policy enactment further provides demonstrated support to uphold the purpose of the policy by leadership and staff alike. Without this authorization or permission, a center could change practice without the appropriate buy in, causing disruption in workflow, misunderstanding among levels of staff, or possible citations during site assessments by regulating bodies.



#### Who Should be Involved in Policy Enactment?

Those involved should be members of a center's team who have analyzed the policies needed, who develop and update those policies, who will put the policies into action, and who will enforce the policies. Key stakeholders should also be included in policy enactment. These are individuals who are supportive of a center's mission, and/or have a vested interest in the success of the center, including:

- Government agencies/regulatory entities who design and issue regulations and standards
- Trade associations who support centers through advocacy, education, and networking
- Board members and executive leaders who provide strategic planning and oversight
- Management team who leads the operations of the center as well as oversees daily operations, including policy implementation
- 6 Risk managers, quality improvement leaders, or legal representatives, to ensure the policies enacted do not conflict with laws or regulations

#### How are Policies Enacted?

The policy enactment process is not always straightforward and may be complex and nuanced. The process and procedures for enacting a policy should be documented and consistently followed to receive official approval for implementation.

This document was produced by The Adult Day Center Model Infection Control and Prevention Policies grant Gubrecipient Number LDAGHP603-GP23) awarded to LeadingAge Virginia in 2022 with funding from the Centers for Disease Control and Prevention through the Virginia Department of Health Office of Epidemiology, Division of Healthcare-Associated Infections and Antimicrobial Resistance Program. All products and materials developed through this grant shall not be duplicated the Control of the Control of Control of the Control of Cont





### Policy Enactment Tip Sheet





### Policy Enactment: How is it Done?

### To Do:

- Review the regulation the policy attempts to address, ensuring it does not conflict with the regulation. Have a regulatory expert review the document.
- Include stakeholders in the process who are both supportive of the policy as well as those who may voice concerns or counterpoints for consideration.
- Send a draft to staff and identified stakeholders for review, including the Board if applicable, providing ample turnaround time. Policy enactment can be a slow process that could require several attempts, which may result in repetition.
- Allow for feedback.
- Policy enactment is complete when the policy has been authorized for use.
- Remember to include documentation (date, committee approved by) that the policy has been approved or authorized.





# Policy Enactment: Key Points

### The policy approval committee should be asking:

- Does the policy clearly state the goals or objectives?
- Are the evidence-based components of the policy clearly articulated?
- Are the components of the policy consistent with those of model policies?
- Are the requirements for implementation clearly stated in the policy?
- Are the requirements feasible given available resources?
- Does the policy articulate the mechanism for monitoring implementation?
- Does the policy identify indicators for assessing program success?
- What type of resistance or opposition exists?
- Were any key changes originally proposed to the policy's content?
- How is the content of the policy similar to or different from that of other policies?



# Policy Enactment: Benefits

- Creates a framework/structure for action and continual improvement
- Provides clear guidelines and expectations
- Ensures compliance with regulatory standards
- Anticipates problems and mitigates risks
- Provides a structure for working through an incident or problem
- Promotes equity, consistency and uniformity





# Policy Enactment: Challenges and Solutions

### **Challenges**

- Lack of coordination
- Poor communication
- Inaccurate information
- Failure to anticipate problems
- Failure to achieve objectives
- Unanticipated costs
- Staff pushback

### **Solutions**

- Strategy meetings
- Routinely scheduled meetings
- Fact check information
- Trial rollouts to beta test
- Staff competency testing
- Phased roll-out
- Staff education and involvement in all steps of the process





# Policy Enactment: Tips

- Make sure your policies and procedures are well-formulated. Start with a critical review. Make sure
  polices align across regulatory bodies.
- Gather feedback from several sources to prevent possible surprises.
- Plan for compliance and roll out.
- Plan for any actions/processes within the policies that will affect budget and plan accordingly
- Communicate with purpose.
- Retain documentation of staff education regarding the policy.
- Test for complete understanding.
- Evaluate for success and areas of improvement.
- Review polices annually and update as needed.





# Auditing, Monitoring and Compliance

**Auditing, Monitoring and Compliance** 

#### Audited IPC Practices

The actual audit schedule is determined by observations, monitoring, and any identified need to improve a focus area regarding a particular IPC practice. These audit areas are recommended to

- Hand hygiene: adherence to policy's stated practice and appropriate stocking of supplies
- . Use of standard precautions and/or routine practices
- · Proper use of personal protective equipment
- Safe injection and blood glucose testing practices
- Cleaning, disinfection, and sterilization of equipment and devices
- Environmental cleaning
- Linen and laundry
- · Occupational health issues, such as sharps injuries/needle sticks
- · Outbreak management
- Food storage
- Supply storage
- [Insert other audit areas as needed based on observations or monitoring]

#### Guidelines, Standards, and Resources for Policy/Procedure Development

Please refer to the following resources when developing an auditing, monitoring, and compliance

- Daily Cleaning Competency Validation | HQIN
- Environmental Cleaning Competency Validation | HQIN
- Hand Hygiene Competency Validation | HQIN
- Injection Safety Competency Validation | HQIN Masking and Face Shield Competency Validation | HQIN
- Masking Competency Validation | HQIN
- Personal Protective Equipment (PPE) Competency Validation | HQIN
- Point of Care Testing, Assisted Blood Glucose Monitoring Competency Validation | HQIN
- Safe Linen and Laundry Management Competency Validation | HQIN

Auditing, Monitoring, and Compliance

#### Virginia Adult Day Center Audit Tool Use and Recommendations

Model Infection Control and Prevention Policies Grant

#### What is Auditing and Monitoring?

An effective infection prevention and control (IPC) program includes auditing, monitoring and compliance as a practice.

- Auditing is a systematic review comparing actual practice to a practice described in a standard. Audits help uncover where practices differ from those described by a standard and/or center policy. They can include inspection of the physical site, a review of workplace infection prevention practices, an assessment of staff knowledge and application of infection prevention principles. Results can benefit center staff when used to identify practices needing improvement.
- . Monitoring is a continuous method of observing a process to detect compliance and risk issues. Ongoing monitoring is used to understand where practice may be inconsistently performed or where practice does not follow center policy.

#### Why Audit and Monitor?

Properly implementing these methods can help organizations remain compliant with standards and regulations, help strengthen operations, and assist in achieving a successful IPC program.

#### Instructions for Use:

- · Each audit tool can be used to conduct both a competency assessment/skill check and an observational audit of staff.
  - Each tool requires a qualified evaluator, indicated by their understanding and mastery of the subject matter, to utilize them.
- · The evaluator should use a blank tool for each evaluated staff member and list the staff member's name and title. They should also indicate if the audit is being done for orientation, annual review.
- · The evaluator should watch the staff member complete each of the steps and write "yes", "no," or "NA" in the appropriate column.
- "Yes" indicates the staff member completed the step correctly, "no" indicates they did not complete the step correctly, and "NA" indicates the step was not completed. They should add any additional comments or insight into the comments column.
- . The evaluator should circle YES or NO if they provided feedback to the staff member at the time of the audit and sign and date the completed audit tool. The staff member should also sign the completed audit tool.

#### Schedule of Audits:

The use of audit tools should be completed according to a routine and center-specific schedule determined by observations, monitoring, and any identified need to improve a focus area regarding a particular IPC practice.

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Tips for Using **Audit Tools** 





# **Environmental Cleaning**

#### **Environmental Cleaning and Disinfection**

Initial Effective Date	mm/dd/yyyy
Most Recent Revision Date	mm/dd/yyyy
Authorized/Reviewed by	Individual or Committee Name
Standard	22VAC40-61-290

#### Definition and Overview (define the infection control practice)

Cleaning refers to the removal of visible soil from surfaces through the physical action of scrubbing with a surfactant or detergent and water. This step is important to reduce the volume of organisms on the surface and remove any material that could interfere with disinfection.

Disinfection refers to the use of chemicals (disinfectants) to kill germs on surfaces and objects. Some common disinfectants are obleach and alcohol solutions. Disinfectants need to be left on on surfaces and objects for a certain length of time ("contact time") to kill regerms based on the product's instructions. This policy will refer to contact time; different organisms require different wet contact times to kill the targeted organism. Disinfecting does not necessarily clean dirty surfaces.

#### Purpose (why this policy/procedure is important)

Environmental surfaces can be a source of pathogens in centers. If environmental surfaces are not properly cleaned and disinfected, pathogens from the surface can be transferred to participants and staff. Proper cleaning and disinfection of environmental surfaces is necessary to break the chain of infection.

#### Responsibility (who is responsible for following this policy/procedure)

For the purpose of this policy, "designated staff" refers to those roles within the center responsible for overseeing environmental cleaning and disinfection. All staff and volunteers are responsible for following environmental cleaning policies and procedures.

#### Poli

To reduce the risk of the spread of infection from environmental surfaces, it is the policy of this center to adhere to the Centers for Disease Control and Prevention (CDC) recommendations for Environmental Infection Control Guidelines.

#### Staff Responsibilities:

- All staff with responsibilities under this policy will receive training on and be familiar with CDC guidelines for cleaning and disinfection and will follow those guidelines.
- Staff must be knowledgeable regarding EPA-registered cleaning and disinfecting agents used in the center:
  - What products are available and where and how they are to be used in the center
  - What they are and how to access the Safety Data Sheets (SDS) for products used
  - How to locate and identify labels/manufacturer instructions for each product, including following precautionary statements (i.e., use of Personal Protective

#### **Environmental Cleaning and Disinfection**

#### Equipment (PPE))

- Identify the selection and proper use of appropriate PPE required to protect the skin, eyes, and mouth during routine handling of cleaners and disinfectants
- Proper use according to manufacturer instructions and product labels (appropriate applications, germs killed, dilution, application and use, and contact time)
  - How to Read a Disinfectant Label | CDC

#### Cleaning and Disinfecting Schedule:

- A cleaning schedule has been developed by this center to provide ease of use and
  understanding by all staff responsible for components of center cleaning and disinfection.
  The established schedule is made available in a format that allows it to be cleaned (i.e.,
  laminated) and the location of the schedule is made known to all staff. The
  center
  provides education for staff related to any changes in cleaning and disinfection, including
  changes in the established schedule.
- The center's schedule establishes the frequency of cleaning and disinfection of
  environmental surfaces in different areas within the center. The schedule also specifies
  scenarios that may occur (e.g., immediately if surfaces are visibly soiled, daily for hightouch surfaces; immediately upon departure of a known sick individual under isolation).
  The schedule establishes and defines routine cleaning, high-rouch surfaces (mandrails or
  switches) and low-touch surfaces (walls),and reinforces that high-touch surfaces require
  more frequent cleaning than low-touch surfaces.
- When an emergency cleaning outside of scheduled cleanings is needed (i.e., someone has an incontinence accident or becomes sick while at the center), designated staff are notified of the needed cleaning. Any type of spills, including body fluid spills or other contaminations, shall be cleaned immediately. Cleaning spills or potential contaminants is important to prevent participants from experiencing any negative outcome.
- When establishing a cleaning schedule, any areas being utilized for isolation of ill participants or staff members should be cleaned ofter all cleaning for non-isolation areas has been completed.
- All caddies, carts, trolleys, buckets, and containers used for cleaning must be thoroughly cleaned after each use prior to storing in the designated storage area.

#### General Practices Regarding Cleaning and Disinfection:

- All cleaning supplies and solutions must never be left unattended and must be secured (locked) when not in use.
- · Personal items, including food and drink, must never be stored with cleaning supplies.
- Staff must select and use proper PPE for preparation and use of cleaning and disinfecting agents according to Standard Precautions for the task and according to manufacturer's instructions for each agent used.
- All PPE needed for cleaning and disinfecting agent preparation and use shall be readily
  accessible to staff, stored appropriately, and well-stocked.
  - List location(s) where PPE is available



Environmental Cleaning and Disinfection





# Participant Care Equipment, Devices and Supplies

#### Participant Care Equipment, Devices and Supplies

Initial Effective Date	mm/dd/yyyy
Most Recent Revision Date	mm/dd/yyyy
Authorized/Reviewed by	Individual or Committee Name
Standard	22VAC40-61-290

#### Definition and Overview (define the infection control practice)

Participant care equipment in adult day centers is categorized as reusable participant care items that contact intact skin but not mucous membranes. Examples of these types of participant care items are blood pressure cuffs and other vital signs equipment, and mobility equipment.

#### Purpose (why this policy/procedure is important)

The Centers for Disease Control and Prevention (CDC) includes cleaning and disinfection of reusable participant care equipment, devices and supplies as a component of Standard Precautions, and they are important processes used to prevent the transmission of pathogens (harmful earms) to participants, staff and visitors.

Cleaning makes the participant equipment and supplies safe to handle and removes matter, salts and soils that can interfere with disinfection. The physical action of scrubbing with detergents and surfactants and rinsing with water removes large numbers of microorganisms from surfaces. If the surface is not cleaned before the disinfection procedures are started, the disinfection process is compromised.

Proper handling, storage, cleaning and disinfection are essential for ensuring that participant care equipment and devices do not transmit infectious pathogens to participants or staff.

#### Responsibility (who is responsible for following this policy/procedure)

All staff have a responsibility to know and follow the elements of this policy that affect their job functions and have a responsibility to monitor the implementation and quality of cleaning and disinfection of participant care equipment and devices.

#### Policy

- All policies and procedures for general environmental cleaning and disinfection must be followed when cleaning and disinfecting participant equipment and supplies, in addition to the specific policies and procedures outlined below.
- Reusable participant equipment and reusable medical devices must be cleaned and disinfected with an EPA-registered healthcare disinfectant according to the manufacturer's instructions and product labels.
  - Using inappropriate cleaning products can result in damage or failure to remove pathogens (germs).
  - Staff must adhere to use instructions, including the product's specified contact time (also known as "wet time" or "kill time") to perform as expected and to avoid exposure or injury.

#### Participant Care Equipment, Devices and Supplies

- Equipment and devices must be cleaned and disinfected between participants and whenever they become soiled or contaminated.
  - Equipment and devices must be cleaned and disinfected as soon as possible after use to avoid drying/adherence of soiling onto the equipment or device
  - Equipment and devices should be cleaned and disinfected at the point of use, before moving to a common or storage area
  - Equipment and devices may only be placed in clean storage areas if they have been appropriately cleaned and disinfected
  - Equipment and supplies should never be stored within three (3) feet of a sink due to the potential for solash contamination
  - When clean and contaminated storage share the same physical space, clean and contaminated space must be separated and designated with at least three (3) feet of separation between clean and contaminated items
- Cleaned and disinfected participant care equipment, devices and supplies must be stored in a manner that prevents contamination.

#### Procedure

- Clean and disinfect reusable participant care equipment, devices, and supplies as soon as
  possible after use and always before storage in clean areas or for use with another
  participant.
- Perform cleaning and disinfection at the point of use or in an area that is not the designated clean area.
- 3. Gather supplies, including:
  - EPA-registered cleaning and disinfecting agent(s) that are approved by the equipment/device manufacturer, prepared according to product label instructions
  - Personal Protective Equipment (PPE) required by Standard Precautions and the product label instructions or Safety Data Sheet (SDS)
  - c. Cleaning cloths
- 4. Follow manufacturer instructions and product labels for cleaning and disinfection.
- 5. Place cleaned and disinfected equipment, devices, or supplies in the center's designated clean storage area. This clean storage area should be marked with signage. All items in the designated clean storage area are presumed to be cleaned according to the center's expectation and process.

#### Guidelines, Standards, and Resources for Policy/Procedure Development

- CDC's Core Infection Prevention and Control Practices for Safe Healthcare Delivery in All Settings | CDC
- . Strategies to Mitigate Cross Contamination of Non-Critical Medical Devices | APIC
- Environmental Cleaning Procedures | CDC
- Environmental Infection Control Guidelines | CDC



Participant Care Equipment, Devices and Supplies





### Where Do You Start?

- 1. Prepare developed policies for review and approval
- Review policy enactment process and verify you have the right individuals involved, including key stakeholders and staff
- 3. Allow for feedback and revisions to policies
- 4. Obtain approval
- Participate in the next Office Hours webinar to learn how to implement your policy







# **Polling Question**

### What is your next step based on the information shared today?

- 1. Work with leadership to develop a policy enactment process
- Review our policy enactment process, ensuring we include key stakeholders and are following our process
- Include staff representatives and have them complete trial policy rollouts to test a policy and anticipate problems before they occur
- 4. Other (type your step in the chat)

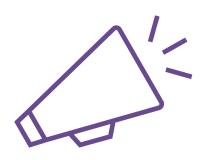






### **Next Session**

# **Policy Implementation**



Thursday, August 10, 2023 2:00 p.m. EST

**Register Today** 











### Contact Information

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