

COVID-19 Webinar for Behavioral Health Care and Human Services Accreditation

Q&A With The Joint Commission

May 17, 2022

Today's Panel of Speakers

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Vaccination Information

Required Documents

1. Overall COVID vaccination rate of eligible staff, excluding exempted staff
2. A list of all staff, including positions/titles, including COVID Vaccination status
3. All policies regarding health care staff COVID vaccinations
 - Policies for COVID Vaccination exemptions
 - Policies for COVID Vaccination Requirements
 - Policies for mitigation of unvaccinated staff
4. List of newly hired staff in last 60 days

Compliance Timelines

Timelines for **Original 25 States, DC and Territories**

- **1/27/2022 – 2/27/2022**
 - Establish and implement policies and procedures
 - All staff have at least one dose of vaccine
- **2/28/2022 – 3/27/2022**
 - Establish and implement policies and procedures
 - Staff must be 100% Vaccinated*

Timelines for **Additional 24 States**

- **2/14/2022 – 3/14/2022**
 - Establish and implement policies and procedures
 - All staff have at least one dose of vaccine
- **3/15/2022 – 4/13/2022**
 - Establish and implement policies and procedures
 - Staff must be 100% Vaccinated*

Timelines for Texas

- **2/22/2022 – 3/20/2022**
 - Establish and implement policies and procedures
 - All staff have at least one dose of vaccine
- **3/21/2022 Forward**
 - Establish and implement policies and procedures
 - Staff must be 100% vaccinated*

Pre-Submitted Questions

Please define "complete vaccination series".
Does it include the 3rd dose (Pfizer Vaccine)?

Current FAQ's

The following is a list of related FAQs:

[COVID-19 CMS Vaccination Requirements - Applicable Entities](#)

[COVID-19 CMS Vaccination Requirements - Applicable Staff](#)

[COVID-19 CMS Vaccination Requirements - CMS Definition of 'Fully Vaccinated'](#)

[COVID-19 CMS Vaccination Requirements - Exemptions](#)

[COVID-19 CMS Vaccination Requirements - Good Faith Efforts](#)

[COVID-19 CMS Vaccination Requirements - Required Documents, Policies and Procedures](#)

[COVID-19 CMS Vaccination Requirements - Determination of Compliance](#)

CMS 1135 Waivers

Pre-Submitted Questions

Are we required to have a COVID-19 policy by The Joint Commission since mandates are lifted?

Public Health Emergency (PHE) Extension

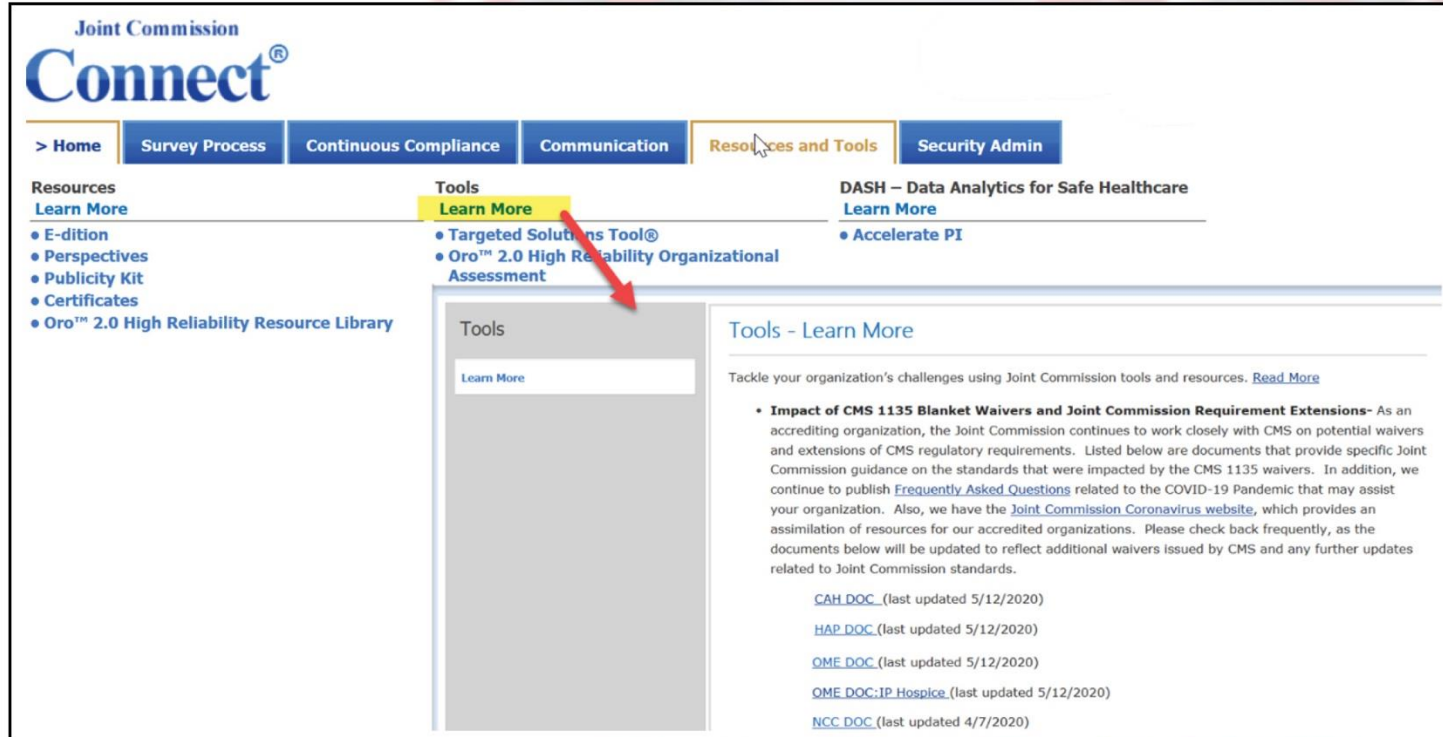
The Department of Health and Human Services released a statement on 04/12/22 stating the PHE was extended

The renewal effective date is Saturday 04/16/22 and will last for 90 days ★

This is the ninth extension of the PHE

★ 1135 Waivers will remain in effect during the declared PHE

Looking for more information on CMS 1135 Waivers?



The screenshot shows the Joint Commission Connect website interface. The navigation menu includes: > Home, Survey Process, Continuous Compliance, Communication, Resources and Tools (highlighted), and Security Admin. Under Resources, there is a 'Learn More' link and a list of items: E-dition, Perspectives, Publicity Kit, Certificates, and Oro™ 2.0 High Reliability Resource Library. Under Tools, there is a 'Learn More' link (highlighted with a red arrow) and a list of items: Targeted Solutions Tool@ and Oro™ 2.0 High Reliability Organizational Assessment. On the right, there is a section for 'DASH – Data Analytics for Safe Healthcare' with a 'Learn More' link and 'Accelerate PI'. The main content area shows 'Tools - Learn More' with a sub-section titled 'Impact of CMS 1135 Blanket Waivers and Joint Commission Requirement Extensions-'. Below this, there are several document links with their last updated dates: CAH.DOC (last updated 5/12/2020), HAP.DOC (last updated 5/12/2020), OME.DOC (last updated 5/12/2020), OME.DOC:IP Hospice (last updated 5/12/2020), and NCC.DOC (last updated 4/7/2020).

Accredited organizations can learn more by visiting **Resources and Tools > Tools > Learn More** in their *Joint Commission Connect*® extranet site.

Infection Control Practices

Pre-Submitted Questions

Does The Joint Commission require mandatory COVID-19 infection control procedures specifically for behavioral health organizations? If so, what are those procedures?

Where can I find COVID-19 precautions that are up to date?

Resources:

Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html>

CMS COVID-19 Infection Control for Psychiatric and Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID)

<https://www.cms.gov/files/document/qso-21-07-psych-hospital-prtf-icf-iid.pdf>

SAMHSA COVID-19: Interim Considerations for State Psychiatric Hospitals

<https://www.samhsa.gov/sites/default/files/covid19-interim-considerations-for-state-psychiatric-hospitals.pdf>

Pre-Submitted Questions

Do all direct care staff need fit to be tested for respirators annually?

Resource: OSHA Personal Protective Equipment, Respiratory Protection Standard

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

Pre-Submitted Questions

Can we use non alcohol sanitizer against COVID-19?

Pre-Submitted Questions

Are organizations continuing to practice COVID-19 screenings and the use of face masks at clinics?

Pre-Submitted Questions

What is the process for reporting a COVID-19 positive patient?

Recovery and The Joint Commission

Frequent questions you've submitted

- Will I have an Onsite or Offsite (virtual) survey?
- How or when will we get a survey?
- What type of instruction have you provided to your surveyors?
- What will that survey process look like, any differences?
- What will the surveyors focus on?

Onsite survey activity

Onsite survey activity has been ongoing with close monitoring of the rise of COVID-19 and impacts on survey activity.

Organizations should continue to monitor the Notification of Scheduled Events section of the Joint Commission Connect page for notification of the scheduled survey.

We are aware that some surveys are past their due dates, CMS is also aware – we will conduct those surveys when we are able to do so.

We are prioritizing initial and past due organizations.

Offsite (virtual) survey

Offsite (virtual) survey– we are conducting offsite surveys for Disease Specific Care (DSC), free-standing Behavioral Health Care (BHC) programs, telehealth and sleep centers.

- We continue to monitor COVID/variant cases and retain the ability to expand to more offsite surveys for other programs if necessary; however, our primary focus is onsite surveys when possible

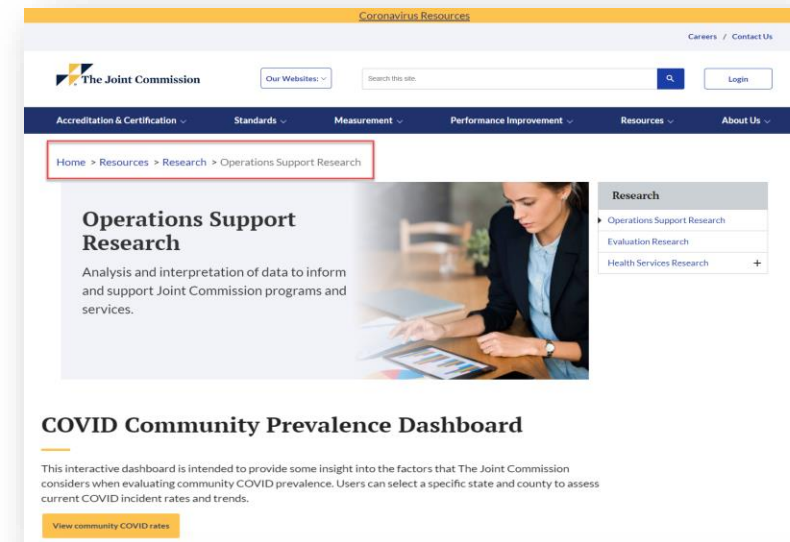
What is an offsite survey?

- Utilization of Secure Zoom technology for the survey and facility review accessed through the agenda on the Extranet
- Use of a secure SharePoint site for document upload to review pre-survey
- Discussions via webcam (Zoom)
- Review of processes and physical environment via mobile webcam (Zoom)

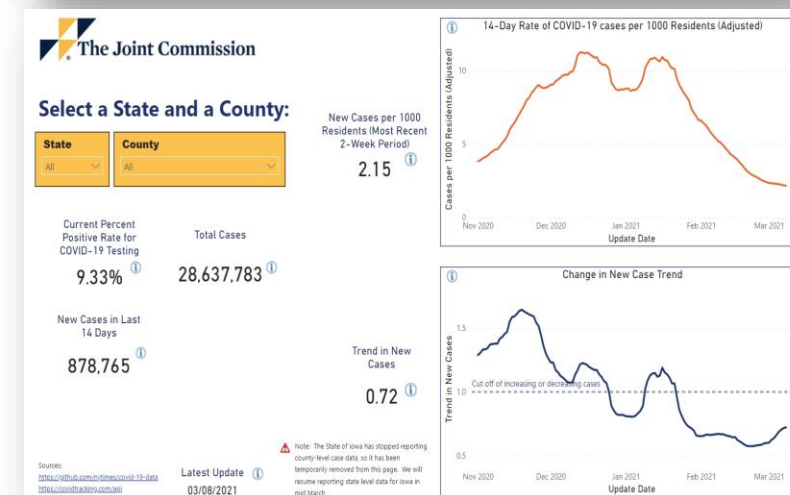
How do you determine where to conduct onsite surveys?

Community Prevalence Dashboard

- Number of COVID-19 cases are lower with less impact to organizations
- Cases/thousand population and new cases within the county
- Determination that Joint Commission staff can travel to area safely and find appropriate accommodations



The screenshot shows the top navigation bar of The Joint Commission website with a search bar and a 'Login' button. Below the navigation bar, there is a breadcrumb trail: Home > Resources > Research > Operations Support Research. The main content area features a section for 'Operations Support Research' with a sub-header 'Analysis and interpretation of data to inform and support Joint Commission programs and services.' To the right, there is a 'Research' menu with options for 'Operations Support Research', 'Evaluation Research', and 'Health Services Research'. Below this, the 'COVID Community Prevalence Dashboard' is introduced with a brief description: 'This interactive dashboard is intended to provide some insight into the factors that The Joint Commission considers when evaluating community COVID prevalence. Users can select a specific state and county to assess current COVID incident rates and trends.' A button labeled 'View community COVID rates' is visible at the bottom of the dashboard section.



What instructions have been provided to our surveyors?

- **Follow the most current CDC guidelines**
- Do not travel if you are sick
- Do not travel if you have been in close contact with individuals with known or suspected COVID-19
- Avoid large crowds
- When traveling wear a mask/face covering
- Practice physical distancing
- Practice good hand hygiene

All Joint Commission Surveyors and Reviewers conducting on-site events are fully vaccinated, as defined by CDC.

What instructions have been provided to our surveyors?

- **Review and follow individual state department of health specific travel regulations****
- When onsite wear a medical mask and eye protection is encouraged
- **Follow the organizations' infection prevention and control policies for entry and use of PPE**
- Do NOT enter at risk or confirmed COVID-19 resident rooms
- Do NOT enter rooms where high-risk procedures performed
- The Joint Commission does not have a routine COVID-19 testing program for surveyors

***Joint Commission surveyors are designated as essential workers*

What has changed about the survey process?

The survey process and its components will remain the same however here are some guidelines for the survey:

- Limiting the number of individuals in group sessions
- The use of audio or videoconferencing could be incorporated to safely expand the number of attendees for sessions
- Use of masks will be a routine practice
- Maximize the use of technology to eliminate the number of people needed to sit directly next to an individual for an extended period of time. (For example, screen sharing or projecting medical records)
- Interviewing patients and staff by telephone
- Driving in separate cars to offsite or patient homes

Survey process - continued

- We will NOT Enter at risk or confirmed COVID-19 rooms or homes.
- We will avoid visiting a unit with any confirmed COVID-19 patients when possible.
- Limited physical review of high risk and aerosol generating procedures
- Consider using a simulation and/or distant review of certain activities/procedures
- Practice social/physical distancing during the survey
- Follow “PPE” and risk reduction strategies as established by the CDC
- Limit attendance at group sessions e.g., opening, briefings, system tracers
- Limiting observers or scribes to avoid additional exposure during the survey

What will be the focus of survey activities?

- During the opening conference we will have a discussion with you about the impact of the current pandemic and your organization's response.
- We will discuss both Infection Control and Emergency Management.
- The focus of our survey will not be the timeframe of the public health emergency but the current situation within your organization.

Additional Questions

- For onsite surveys, should staff/surveyors be vaccinated?

The Joint Commission implemented a policy requiring all US-based enterprise staff to be vaccinated against COVID-19.

- Can we provide additional avoid dates?

We would ask that you do not provide additional avoid dates due to the difficulty in scheduling surveys – avoid dates already submitted will be honored to the extent we can do so.

Pre-Submitted Questions

Will mental healthcare facilities be virtual or in-person?

Pre-Submitted Questions

Is there an area COVID positivity rate level that would trigger a hybrid remote and on-site survey process?

Environment of Care and Life Safety

Pre-Submitted Questions

How can behavioral health provide airborne isolation when our buildings are not designed for negative pressure?

Pre-Submitted Questions

We do not have an anteroom to our isolation room when we have a possible or actual positive COVID patient. This room breaks the fewest rules although technically it still breaks rules of IC. What are other facilities doing to accommodate these patients?

Time For More Questions?

Resources

- COVID Resources

- <https://www.jointcommission.org/covid-19/>

- Standards Interpretation

- <https://www.jointcommission.org/standards/standard-faqs/>

Thank You

We support your efforts
in response to the
COVID-19 pandemic and
hope to provide helpful
resources

