Infection Control Breaches

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Medicare Innovations

- Pioneer ACOs
- ACO Advance Payment Model
- Bundled Payments
- Comprehensive Primary Care
- Advanced Primary Practice Demo
- Community Based Care Transitions Program
2015

- Value based purchasing for physicians
- Reduce payment for HAIs
- Seamless health care system – a continuum of care and

- A CONTINUUM OF HEALTHCARE ORGANIZATIONS

Affordable Care Act

- Focus on prevention
- Penalties for HAIs
- Penalties for readmissions
- Cost of extended stays
Quality Indicators

- Flu vaccination
- Pneumonia vaccination
- Cancer Screenings
- Hypertension
- Weight
- Smoking
- At Risk Populations

Significant Change in Types of Providers Being Used
Health Care Reform and Infection Prevention

• Value driver
• Quality measures- focus on prevention

have to raise the bar for our infection prevention and surveillance programs

Increase in Infection Control Breaches

• Breach, infraction, violation, transgression all denote in some way the breaking of a rule or law or the upsetting of a normal and desired state.
WHO finds hospital breaches worsened MERS outbreak in UAE

Paiute Shoshone Tribal Nation
Smallpox vials, decades old, found in storage room at NIH campus in Bethesda

Nevada jury asked to award $2.5B for hepatitis C outbreak
The Joint Commission Alerts Health Care Industry to Prevalence of Unsafe Injection Practices

Why The Increase?

Poor skills?
Lack of integrity?
Lack of knowledge?
Ebola Virus
CMS 5/30/14 Memorandum

• Medicare certified providers are required to adhere to generally recognized standards of infection control practices

• This memorandum is a summary for the state survey agencies (SAs) and the accrediting bodies (AOs)

• They are very specific in regard to tag numbers of the regulations
Subject: Infection Control Breaches Which Warrant Referral to Public Health Authorities

Tag Numbers

- 42 CFR §416.51 for ambulatory surgical centers
- 42 CFR §418.60 for hospices
- 42 CFR§482.42 for hospitals
- 42 CFR §483.65 for skilled nursing facilities and nursing facilities
- 42 CFR §484.12(c) for home health agencies (HHAs)
- 42 CFR §485.635(a)(3)(vi) for critical access hospitals (CAHs)
Tag Numbers

- 42 CFR §491.9(b)(3)(iii) for rural health clinics (RHCs) and Federally Qualified Health Centers,
- 42 CFR §494.30 for dialysis facilities
Breaches Discussed in The Memo

• Those breaches that impose a risk of bloodborne pathogen transmission including, but not limited to, medication administration practices.

Breaches

• Using the same needle for more than one individual
• Using the same syringe, pen, or injection device for more than one individual
• Re-using a needle/syringe which has already been used to administrate medication to an individual to subsequently enter a medication container (vial, bag)
• Using the same lancing/needlestick device for more than one individual even is the lancet has been changed
Evaluating An Infection Control Breach

- Identification of the breach
- Additional data gathering
- Notify and involve key stakeholders
- Qualitative Assessment Of Breach
- Decision Regarding Patient Notification and Testing
- Communications and Logistical Issues

Key Stakeholders

- Infection control professionals/experts
- Risk management
- Local and state health departments
- Any affected healthcare providers
- Other local, state and federal regulatory agencies as indicated
Qualitative Assessment

- Category A - gross error or demonstrated high-risk practice
- Category B - lower likelihood of blood exposure

Patient Notification Letters

- Send out early in week
- Cognizant of holidays
- Allow for appropriate timing of media notification
- Prepare for a deluge of phone calls
- Have time to effectively manage the situation
Communication/Logistics

- Develop and carefully plan materials
- Post exposure treatment
- Obtaining consents
- Call centers
- Address legal issues

Needlestick Safety

To Prevent Transmission of Infections in Healthcare

ONE NEEDLE, ONE SYRINGE, ONLY ONE TIME.

Safe Injection Practices Coalition
www.ONEandONLYcampaign.org

Injection Safety is Every Provider’s Responsibility
One and Only Campaign

- New York
- New Jersey
- Colorado
- North Carolina

Understanding The Implications

- Malpractice
- Loss of license
- Agency Closure
- Financial loss
- Imprisonment
“Chance favors the prepared mind”
- Louis Pasteur
1822-1895
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