



WELCOME!

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EQulP for LTC webinar will begin at 10:00 AM PST

Today's topic is "Antibiotic Stewardship
Survey Expectations"

11/22/17

Antibiotic Stewardship Survey expectations

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History

- **No Major Changes to Long Term Care Policies since 1991**
- **Infection Control primarily in one regulation (F441)**
- **Beginning in July 2015 CMS published proposed updates to LTC rules**

Survey Process and Implementation Schedule

- **November 2016 began a 3 phase implementation of the new rules:**
 - **Phase 1 November 2016:**
 - update current rules including addition of new requirements within existing rules
 - additions to interpretive guidelines
 - clarifications of vague or often misinterpreted regulations
 - **Phase 2 November 2017:**
 - Add new regulations
 - Revise entire numbering system
 - Revise LTC survey process
 - **Phase 3 November 2019:**
 - Add additional new regulations

Implementation of Antibiotic Stewardship

- **Beginning November 28, 2017 each facility must establish an antibiotic stewardship program**
- **The program must include antibiotic use protocols and a system to monitor antibiotic use.**
- **Stewardship program is not included in the infection control Tag F 880 but has been given a separate tag**
- **Outline of stewardship expectations can be found at tag F 881**

Intent of the Rule

The intent of this regulation is to ensure that the facility:

- **Develops and implements protocols to ensure residents who need an antibiotic receive the appropriate antibiotic;**
- **Reduce the risk of antibiotic-resistant organisms, from unnecessary or inappropriate antibiotic use;**
- **Develops, promotes, and implements a facility-wide system to monitor the use of antibiotics**

Core Elements

- **Facility leadership commitment to safe and appropriate antibiotic use;**
- **Appropriate facility staff accountable for promoting and overseeing antibiotic stewardship;**
- **Accessing pharmacists and others with experience or training in antibiotic stewardship;**

Core elements

- **Implement policy(ies) or practice to improve antibiotic use;**
- **Track measures of antibiotic use in the facility (i.e., one process and one outcome measure);**
- **Regular reporting on antibiotic use and resistance to relevant staff such as prescribing clinicians and nursing staff; and**
- **Educate staff and residents about antibiotic stewardship**

Policies and protocols

- **Incorporated into overall Infection Prevention and Control**
- **Reviewed annually**
- **Include system of reporting regarding usage and outcomes**
- **Incorporate monitoring into already existing programs such as monthly medication reviews, QAA program, infection prevention and infection control data analysis**
- **Include use of assessment tools (SBAR, Loeb)**
- **Include mode of education of facility staff and prescribers**

Survey process

- **Each survey requires an investigation of infection control**
- **Referred to as “Facility Task”**
- **This facility task must be used to investigate compliance at F880, F881, and F883**
- **One Surveyor is assigned to coordinate the task and assure all parts of the task are completed**
- **Each surveyor on the team spends time observing for infection prevention practices throughout the survey**

Survey Process

- Survey process completed using a tool referred to as the Infection Control “Critical Element (CE) Pathway”
- All LTC Survey Pathways can be found at:
 - <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Nursing-Homes.html>
- Surveyors use this pathway as guidance for investigation
- Each section addresses a critical element of Infection control

Critical Element For Antibiotic Stewardship

Determine whether the facility has an antibiotic stewardship program that includes:

- **Written antibiotic use protocols on antibiotic prescribing,**
- **Protocols to review clinical signs and symptoms and laboratory reports to determine if the antibiotic is indicated or if adjustments to therapy should be made**

Critical Element For Antibiotic Stewardship

- **A process for a periodic review of antibiotic use by prescribing practitioners:**
- **Determine whether the antibiotic use monitoring system is reviewed**

Critical Element For Antibiotic Stewardship

- **Protocols to optimize the treatment of infections by ensuring that residents who require antibiotics are prescribed the appropriate antibiotic;**
- **A system for the provision of feedback reports on antibiotic use, antibiotic resistance patterns based on laboratory data, and prescribing practices for the prescribing practitioner.**

How do we determine the Answers?

- **Interview staff**
- **Review records of residents with orders for antibiotics**
- **Observations**

How do you prepare

- **Review the Core Elements outlined in F881**
- **Critically assess your own facility utilizing the interpretive guidance in F881**
- **Download copies of the CE pathway for Infection control and “survey” your facility utilizing the CE criteria**

Training Available

- **Integrated Surveyor Training Website (ISTW):**
 - <https://surveyortraining.cms.hhs.gov/index.aspx>
 - “LTC Survey Process SME Videos”
 - “Universal Infection Prevention and Control”
- **Both trainings were mandatory for LTC surveyors**

Questions?

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