Immediate Implementation: CMS COVID-19 Vaccination Tracking

Webinar Objectives

1. Learn about the new CMS requirements
2. Understand when the requirements are in effect
3. Understand how AAAHC will survey to the requirements
4. Review what you can do to be prepared for your next survey

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AAAHC Sr. Vice President of Accreditation Services
416.51 Condition for Coverage—Infection Control

(c) Standard: COVID-19 vaccination of staff
The ASC must develop and implement policies and procedures to ensure that all staff are fully vaccinated for COVID-19. For purposes of this section, staff are considered fully vaccinated if it has been 2 weeks or more since they completed a primary vaccination series for COVID-19. The completion of a primary vaccination series for COVID-19 is defined here as the administration of a single-dose vaccine, or the administration of all required doses of a multi-dose vaccine.

Let’s break that down…

1. Requirement for Policies & Procedures
   - Fully vaccinated: 2 weeks or more since primary COVID-19 vaccination series is completed
   - Primary vaccination series: the administration of a single dose vaccine, or the administration of all required doses of a multi-dose vaccine

2. Definitions

Your ASC must meet 3 basic requirements

- Vaccinating all eligible staff
- Providing exemptions and accommodations for those who are exempt
- Tracking and documenting staff vaccinations
Policies and Procedures must be implemented and include the following:

1. Requirements for ensuring:
   - Single dose/first dose
   - Full vaccination
   - Exemptions and accommodations
   - Additional precautions

2. Documentation and tracking process for:
   - Vaccinations
   - Exemptions

3. Contingency Plans

Who in my facility must be vaccinated?

- Facility Employees
- Licensed Practitioners
- Students
- Trainees
- Volunteers
- Contracted Staff

CMS requires facilities to allow for the following exemptions to staff in accordance with federal law

**Medical Exemptions**
- Request process
- Medical signature
- Clinical contraindication
- Authenticating statement

**Religious Exemptions**
- Request process
- Documented
- Evaluated
Develop a process for implementing additional precautions for any staff who are not vaccinated

- Must ensure that accommodations minimize the risk of transmission of COVID-19 to at-risk individuals

There are three phases for implementation

30 Days
- First/One Dose Exemption
- Pending / Granted
- Vaccination Delay AND P&Ps in place
- 80% Compliance

60 Days
- All/One Dose Exemption
- Granted
- Vaccination Delay AND P&Ps in place
- 90% Compliance

90 Days
- 100% Compliance

...take action now, if necessary

For which states is this regulation applicable and when?
... the timing is a little more complicated

<table>
<thead>
<tr>
<th>Threshold</th>
<th>Group 1</th>
<th>Group 2</th>
<th>Group 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Issued</td>
<td>NA</td>
<td>Dec 28</td>
<td>Jan 14</td>
</tr>
<tr>
<td>30 Days</td>
<td>80%</td>
<td>Jan 27</td>
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<td>60 Days</td>
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<td>Feb 28</td>
<td>Mar 15</td>
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<tr>
<td>90 Days</td>
<td>100%</td>
<td>Mar 28</td>
<td>Apr 15</td>
</tr>
</tbody>
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4. Review what you can do to be prepared for your next survey

How will this affect the survey process and what will Surveyors be looking for?

Entrance Conference
- Request COVID-19 policies and procedures
- Request list of all staff and their vaccination status

Survey Process
- Observe and Interview
- Review Documentation
- Complete Worksheet
Entrance Conference requests

- Request COVID-19 policies and procedures
- Request list of all staff and their vaccination status
- Percentage of vaccinated staff
- List should include:
  - Staff name
  - Role
  - Vaccination/exemption status

How will this affect the survey process and what will Surveyors be looking for?

Survey Process
- Select sample size
  - Vaccinated direct care staff
  - Contracted staff
  - Medical exemptions
  - Nonmedical exemptions
  - Temporary delays
  - Unvaccinated staff
  - Observe & Interview
  - Complete Worksheet

Actions you need to take now to comply
1. Develop a process or plan for vaccinating staff
2. Generate a list of staff with the required information
3. Conduct a gap assessment
4. Create an action plan
Develop a process or plan for vaccinating staff that meets the 3 basic requirements

1. Identify all persons that meet the definition of staff
   - Facility Employees
   - Licensed Practitioners
   - Students & Trainees
   - Volunteers
   - Contracted Staff

2. Create a template that lists staff
   - Staff name
   - Role
   - Vaccination/exemption status and dates

3. Create a process to maintain this list and make it available to the SA or AAAHC at time of survey
   - Who is responsible?
   - Who has access?
   - How is maintained?
   - How often is it updated?

4. Know your vaccination rate at any given time

Process or Plan

Vaccinating all eligible staff
Providing exemptions and accommodations for those who are exempt
Tracking and documenting staff vaccinations
How to calculate your ASCs Vaccination Rate: Example 1

Step 2: Calculate Vaccination Rate

<table>
<thead>
<tr>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of Staff in ASC</td>
</tr>
<tr>
<td>Number of Staff Vaccinated</td>
</tr>
<tr>
<td>Number of Staff with Approved Exemptions</td>
</tr>
<tr>
<td>Number of Staff Medically Contraindicated or Religious Exemption</td>
</tr>
<tr>
<td>Total Number of Vaccinated Staff</td>
</tr>
<tr>
<td>Total Percentage of Vaccinated Staff</td>
</tr>
</tbody>
</table>

How to calculate your ASCs Vaccination Rate: Example 2

Step 2: Calculate Vaccination Rate

<table>
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<tr>
<th>Number</th>
</tr>
</thead>
<tbody>
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Conduct a gap assessment
Create an action plan

Actions you need to take now to comply

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Thank you!