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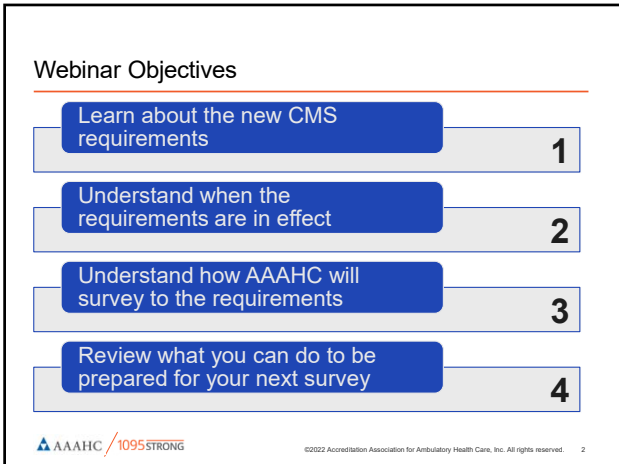
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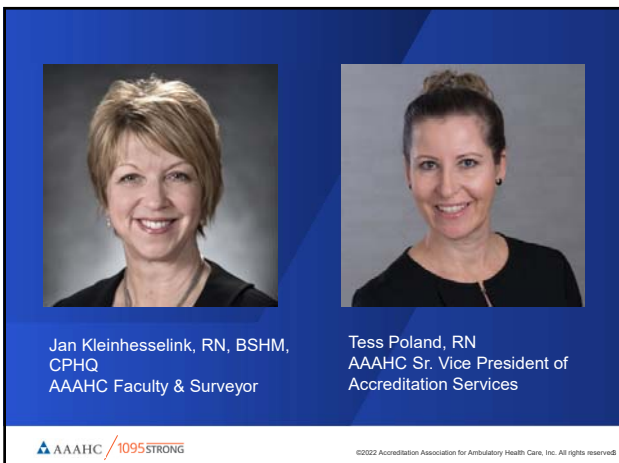
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## 416.51 Condition for Coverage— Infection Control

(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.

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### Let's break that down...

1

Requirement  
for Policies & Procedures

2

Definitions

**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

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### 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

**Process or Plan**

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**Policies and Procedures must be implemented and include the following:**

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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

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**Who in my facility must be vaccinated?**

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

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

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<p><b>Medical Exemptions</b></p> <ul style="list-style-type: none"> <li>• Request process</li> <li>• Medical signature</li> <li>• Clinical contraindication</li> <li>• Authenticating statement</li> </ul>	<p><b>Religious Exemptions</b></p> <ul style="list-style-type: none"> <li>• Request process</li> <li>• Documented</li> <li>• Evaluated</li> </ul>
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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



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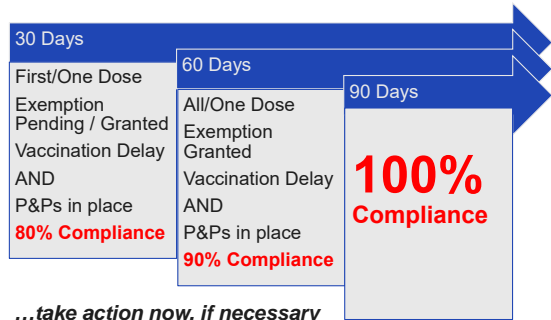
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There are three phases for implementation



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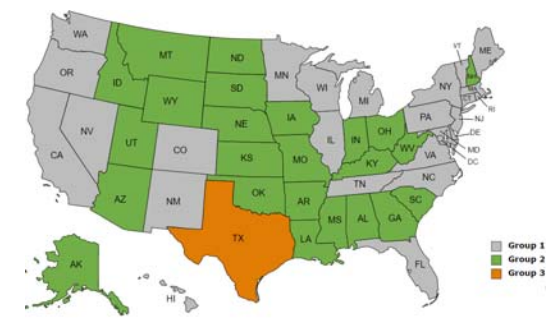
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For which states is this regulation applicable and when?



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... the timing is a little more complicated

	Threshold	Group 1	Group 2	Group 3
Date Issued	NA	Dec 28	Jan 14	Jan 20
30 Days	80%	Jan 27	Feb 14	Feb 22
60 Days	90%	Feb 28	Mar 15	Mar 21
90 Days	100%	Mar 28	Apr 15	Apr 21



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### Webinar Objectives

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

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



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### Entrance Conference requests

**Entrance Conference**

- 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

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

**Survey Process**

- Observe and Interview
- Review Documentation
- Complete Worksheet

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

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17

### 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

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18

## Achieve, Evaluate, & Maintain 1095 Strong Compliance

**AAAHC**  
ACCREDITATION ASSOCIATION  
FOR AMBULATORY HEALTH CARE, INC.

**COVID-19 Health Care Staff Vaccination Worksheet**

**Instructions:** Policies must contain all elements listed in the requirements. Refer to the Threshold Group grid and map below for applicable dates for each phase based on the state group.

**STEP 1: Develop a process or plan for vaccinating staff**

- Vaccinating all eligible staff
- Providing exemptions and accommodations for those who are exempt
  - Additional precautions
  - Contingency plans
- Tracking and documenting staff vaccinations

**STEP 2: Generate a list of staff with the required information**

Create a process that enables you to maintain this list and make it available to the State Agency or AAAHC at time of survey.

Calculate Vaccination	Number
Total number of staff in ASC	
Number of staff vaccinated	
Number of staff with approved exemptions	
Number of staff medically contraindicated or religious exemption	
<b>Total Percentage of Vaccinated Staff:</b>	<b>%</b>

- Who is responsible?
- Who has access?
- How is it maintained?
- How often is it updated?

Know what your vaccination rate is at any given time

**STEP 3: Conduct a gap assessment**

- Complete the attached worksheet.
- Conduct a person personnel file review, select files of both vaccinated and unvaccinated.

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### Develop a process or plan for vaccinating staff that meets the 3 basic requirements 1



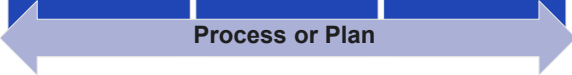
Vaccinating all eligible staff



Providing exemptions and accommodations for those who are exempt



Tracking and documenting staff vaccinations



**Process or Plan**

**AAAHC / 1095STRONG**

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### Generate a list of staff with the required information 2

- Identify all persons that meet the definition of staff**
  - Facility Employees
  - Licensed Practitioners
  - Students & Trainees
  - Volunteers
  - Contracted Staff
- Create a template that lists staff**
  - Staff name
  - Role
  - Vaccination/ exemption status and dates
- Create a process to maintain this list and make available to the SA or AAAHC at time of survey**
  - Who is responsible?
  - Who has access?
  - How is it maintained?
  - How often is it updated?
- Know your vaccination rate at any given time**



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## How to calculate your ASCs Vaccination Rate: Example 1

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Step 2: Calculate Vaccination Rate	Number
Total number of Staff in ASC	98
Number of Staff Vaccinated	55 + 39 = 94
Number of Staff with Approved Exemptions	1 + 3 = 4
Number of Staff Medically Contraindicated or Religious Exemption	0
Total Number of Vaccinated Staff	98
<b>Total Percentage of Vaccinated Staff</b>	<b>100%</b>

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## How to calculate your ASCs Vaccination Rate: Example 2

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Step 2: Calculate Vaccination Rate	Number
Total number of Staff in ASC	165
Number of Staff Vaccinated	112 + 17 = 129
Number of Staff with Approved Exemptions	1 + 1 = 2
Number of Staff Medically Contraindicated or Religious Exemption	0
Total Number of Vaccinated Staff	131
<b>Total Percentage of Vaccinated Staff</b>	<b>79%</b>

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## Conduct a gap assessment

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AAAHC Standard

AAAHC Standard	CFR	Description	Yes	No	Survey Comments
7.1A.7	418.51(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.		<input checked="" type="checkbox"/>	Enter comments for No's.
7.H.3.C	418.51(c)(1)	Regardless of clinical responsibility or patient contact, the policies and procedures must apply to the following center staff, who provide any care, treatment, or other services for the center and for its patients:		<input checked="" type="checkbox"/>	
7.H.3.A	416.51(c)(1)(i)	Center employees;		<input checked="" type="checkbox"/>	Comment
7.H.3.B	416.51(c)(1)(ii)	Licensed practitioners;			
7.H.3.C	416.51(c)(1)(iii)	Students, trainees, and volunteers; and			
7.H.3.D	416.51(c)(1)(iv)	Individuals who provide care, treatment, or other services for the center and for its patients, under contract or by other arrangement.			
7.H.3.E	416.51(c)(2)	The policies and procedures of this section do not apply to the following center staff:			
7.H.3.F	416.51(c)(2)(i)	Staff who exclusively provide telehealth or telemedicine services outside of the center setting and who do not have any direct contact with patients and other staff specified in paragraph (c)(1) of this section; and			
7.H.3.G	416.51(c)(2)(ii)	Staff who provide support services for the center that are			

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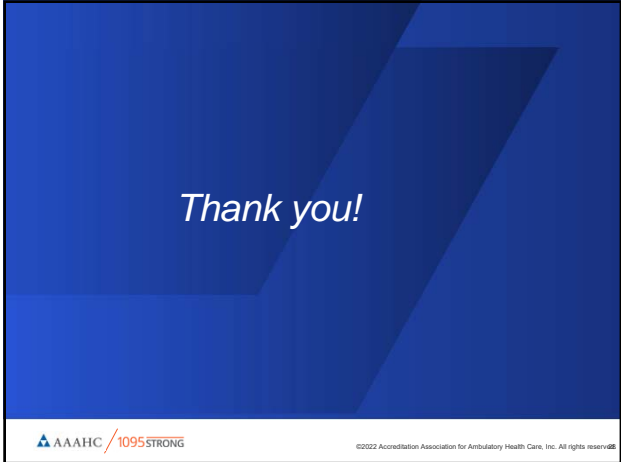
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