

Legionella and CMS Requirements September 6, 2018

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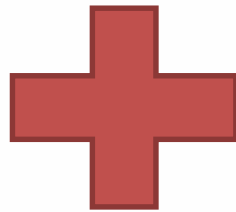


Objectives

- Participants will be able to list the CMS requirements for Legionella in Long Term Care (LTC) facilities
- Participants will be able to develop policies and procedures to prevent and respond to waterborne pathogens in their facility



Safe and
Healthy
Residents

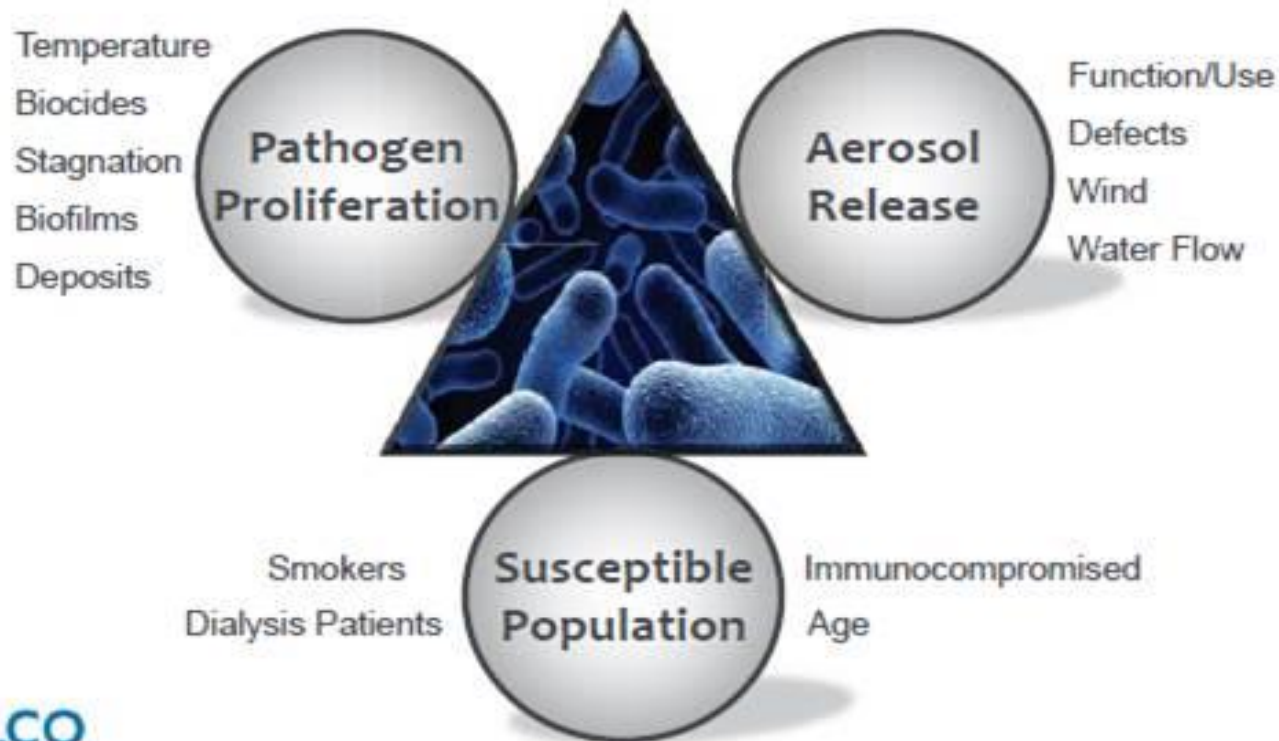


Meet CMS
requirements



Nursing Home that passes surveys!

Our Healthcare Facilities house a susceptible population that we must protect.



NALCO
An Ecolab Company

Picture courtesy of Nalco, An Ecolab Company.

- Use the current version of the memo-a QSO update was released July 6, 2018
- It was originally released in 2017

“Facilities must develop and adhere to policies and procedures that inhibit microbial growth in building water systems that reduce the risk of growth and spread of *Legionella* and other opportunistic pathogens in water. “

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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Center for Clinical Standards and Quality/Quality, Safety and Oversight Group

DATE: June 02, 2017 **Ref: QSO-17-30- Hospitals/CAHs/NHs**
TO: State Survey Agency Directors **REVISED 07.06.2018**
FROM: Director
Quality, Safety and Oversight Group (formerly Survey & Certification Group)
SUBJECT: Requirement to Reduce *Legionella* Risk in Healthcare Facility Water Systems to Prevent Cases and Outbreaks of Legionnaires' Disease (LD)

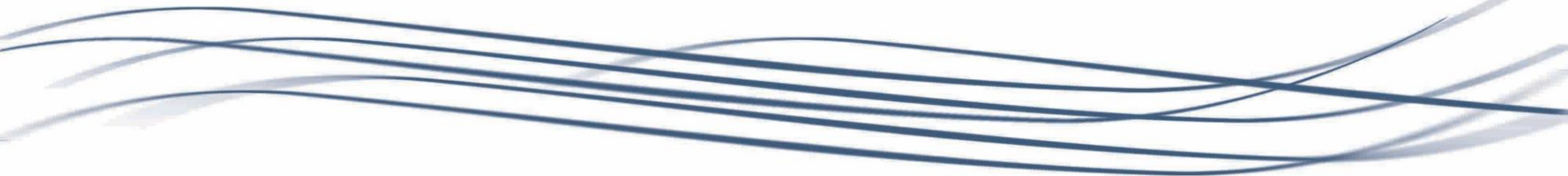
*****Revised to Clarify Expectations for Providers, Accrediting Organizations, and Surveyors*****

Memorandum Summary

- **Legionella Infections:** The bacterium *Legionella* can cause a serious type of pneumonia called LD in persons at risk. Those at risk include persons who are at least 50 years old, smokers, or those with underlying medical conditions such as chronic lung disease or immunosuppression. Outbreaks have been linked to poorly maintained water systems in buildings with large or complex water systems including hospitals and long-term care facilities. Transmission can occur via aerosols from devices such as showerheads, cooling towers, hot tubs, and decorative fountains.
- **Facility Requirements to Prevent Legionella Infections:** Facilities must develop and adhere to policies and procedures that inhibit microbial growth in building water systems that reduce the risk of growth and spread of *Legionella* and other opportunistic pathogens in water.
- This policy memorandum applies to Hospitals, Critical Access Hospitals (CAHs) and Long-Term Care (LTC). However, this policy memorandum is also intended to provide general awareness for all healthcare organizations.
- *This policy memorandum clarifies expectations for providers, accrediting organizations, and surveyors and does not impose any new expectations nor requirements for hospitals, CAHs and surveyors of hospitals and CAHs. For these provider types, the memorandum is merely clarifying already existent expectations.*
- *This policy memorandum supersedes the previous Survey & Certification (S&C) 17-30 released on June 02, 2017 and the subsequent revisions issued on June 9, 2017.*



**WHAT REGULATIONS WILL
SURVEYORS CITE IF THEY TAG
MY FACILITY?**



Regulation	Language
42 CFR §483.80 (for skilled nursing facilities and nursing facilities)	“The facility must establish and maintain an infection prevention and control program designed to provide a safe, sanitary, and comfortable environment and to help prevent the development and transmission of communicable diseases and infections.”
42 CFR §482.42 (for hospitals)	“The hospital must provide a sanitary environment to avoid sources and transmission of infections and communicable diseases. There must be an active program for the prevention, control, and investigation of infections and communicable diseases.”
42 CFR §485.635(a)(3)(vi) (for critical access hospitals (CAHs))	CAH policies must include: “A system for identifying, reporting, investigating and controlling infections and communicable diseases of patients and personnel.”



HOW DO I BUILD AN OPTIMAL WATERBORNE PATHOGEN PROGRAM

What will surveyors be looking for when they come to my facility?



Expectations “Facilities must have water management plans and documentation that, at a minimum, ensure each facility:”

Conducts a facility risk assessment to identify where Legionella and other opportunistic waterborne pathogens (e.g. Pseudomonas, Acinetobacter, Burkholderia, Stenotrophomonas, nontuberculous mycobacteria, and fungi) could grow and spread in the facility water system.

Develops and implements a water management program that considers the ASHRAE industry standard and the CDC toolkit.

Specifies testing protocols and acceptable ranges for control measures, and document the results of testing and corrective actions taken when control limits are not maintained.

Maintains compliance with other applicable Federal, State and local requirements.



Are facilities required to test their water?

- Straight from the CMS Memo:
 - *CMS does not require water cultures for Legionella or other opportunistic water borne pathogens. Testing protocols are at the discretion of the provider.*
- *Alaska does not have a statute requiring it either*

References and Resources

- <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-17-30.pdf>
- “Legionella (Legionnaires’ Disease and Pontiac Fever),” Centers for Disease Control and Prevention.
www.cdc.gov/legionella/maintenance/wmp-toolkit.html .
- Ecolab tools on water safety <https://www.ecolab.com/nalco-water/expertise-and-innovation/water-safety>
- ASHRAE 188: *Legionellosis: Risk Management for Building Water Systems*. ASHRAE: Atlanta. www.ashrae.org

Thank you!
Questions
Comments
Discussion

