Legionella and CMS Requirements
September 6, 2018

Presented by Lori Chikoyak, RN BSN
MPQH AS Project Manager
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

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Meet CMS requirements

Nursing Home that passes surveys!
Our Healthcare Facilities house a susceptible population that we must protect.

Picture curtesy 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. “
WHAT REGULATIONS WILL SURVEYORS CITE IF THEY TAG MY FACILITY?
<table>
<thead>
<tr>
<th>Regulation</th>
<th>Language</th>
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<tbody>
<tr>
<td>42 CFR §483.80 (for skilled nursing facilities and nursing facilities)</td>
<td>“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.”</td>
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<td>42 CFR §482.42 (for hospitals)</td>
<td>“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.”</td>
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<td>42 CFR §485.635(a)(3)(vi) (for critical access hospitals (CAHs))</td>
<td>CAH policies must include: “A system for identifying, reporting, investigating and controlling infections and communicable diseases of patients and personnel.”</td>
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HOW DO I BUILD AN OPTIMAL WATERBORNE PATHOGEN PROGRAM

What will surveyors be looking for when they come to my facility?
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<th>Expectations “Facilities must have water management plans and documentation that, at a minimum, ensure each facility:”</th>
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<td>Conducts a facility risk assessment to identify where Legionella and other opportunistic waterborne pathogens (e.g. Pseudomonas, Acinetobacter, Burkholderia, Stenotrophomonas, nontuberculuous mycobacteria, and fungi) could grow and spread in the facility water system.</td>
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<td>Develops and implements a water management program that considers the ASHRAE industry standard and the CDC toolkit.</td>
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<td>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.</td>
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<td>Maintains compliance with other applicable Federal, State and local requirements.</td>
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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

Thank you!

Questions

Comments

Discussion