CLIENT ALERTS & INSIGHTS

Benesch COVID-19 Resource Center: CMS Long-Term Care Facility Guidance

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On April 2, 2020, the Centers for Medicare & Medicaid Services (CMS), in consultation with the Centers for Disease Control and Prevention (CDC), issued critical recommendations to State and local governments, as well as nursing homes, to help mitigate the spread of the COVID-19 in nursing homes, which are home to some of the nation's most vulnerable citizens.

These most recent recommendations build on and strengthen previous guidance from CMS and CDC related to effective implementation of infection control procedures. The recommendations include:

1. Nursing homes should immediately ensure compliance with all CMS (infection control) and CDC (hand hygiene; long-term care facilities; and optimizing the supply of personal protective equipment (PPE)) guidance related to infection control.
2. CMS and CDC urge State and local leaders to cooperatively work with and consider the needs of long term care facilities with respect to supplies of PPE and COVID-19 tests, which are now covered by Medicare.
3. Nursing homes should ensure symptom screening for all staff, residents, and visitors - including temperature checks.
4. Nursing homes staff must use appropriate PPE when interacting with residents, to the extent PPE is available and per CDC guidance. Residents should cover their noses and mouths when staff are in the room with tissues, cloth or non-medical masks, if available.
5. To avoid transmission within nursing homes, facilities should use separate staffing teams for COVID-19 positive residents, and work with State and local leaders to designate separate facilities or units within a facility to separate COVID-19 negative residents from COVID-19 positive residents and individuals with unknown COVID-19 status.

Nursing homes are unique in the healthcare system because, unlike other healthcare facilities, they are full-time homes as well as settings of care. Importantly, nursing home residents, given their advanced age and corresponding health issues, are at particular risk of complications arising from COVID-19.

Today's recommendations speak to enhanced screening and transmission prevention practices. Previous CMS guidance, issued in mid-March, advised nursing homes to restrict all but the most urgent visitors and staff. Today's guidance builds on this by recommending temperature screenings

for any visitors and that all staff utilize adequate PPE when interacting with patients, to the extent PPE is available.

Benesch stands ready to assist with any questions as we closely follow COVID-19 developments and support client's response efforts.

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Please note that this information is current as of the date of this Client Alert, based on the available data. However, because COVID-19's status and updates related to the same are ongoing, we recommend real-time review of guidance distributed by the CDC and local officials.

