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# **INFECTION CONTROL**

**HOW TO IMPLEMENT AN EFFECTIVE  
APPROACH FOR LONG-TERM CARE**

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**BRIAN GARAVAGLIA, PhD**

# Infection Control

How to Implement an Effective  
Approach for Long-Term Care

Brian Garavaglia, PhD

HCPPro  
a division of BLR

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# Contents

<b>Chapter 1: Purposes and Objectives.....</b>	<b>1</b>
Introduction .....	1
The Purposes of an Infection Control Program.....	2
The Objectives of an Infection Control Program .....	5
<b>Chapter 2: Principles of Disease .....</b>	<b>9</b>
Important Disease Classifications .....	9
Common Modes of Disease Transmission.....	11
Disease Progression.....	12
Immunization in Long-Term Care .....	13
Microbes That Cause Infectious Diseases .....	15
Control of the Growth of Microbes .....	20
Antibiotic Resistance and Antibiotic Stewardship .....	22
Bodily Defense Against Disease.....	24
The 12-Step CDC Program .....	27
<b>Chapter 3: Discussing Some Crucial and Often Overlooked Areas.....</b>	<b>33</b>
Infection Control in the Dietary Area .....	33
Hazard Analysis Critical Control Points .....	35
Handling Linen .....	37
<b>Chapter 4: Policies and Procedures .....</b>	<b>39</b>
Introduction .....	39
<b>Chapter 5: From Theory to Praxis: Staff Education and Competency.....</b>	<b>81</b>
Introduction .....	81
Staff Competencies Related to Infection Control .....	82
Outline for Educational Session .....	84
Discussion Topics .....	103
Sample Test .....	105
Answers.....	111
Personal Protective Equipment for Patient Care and Contact.....	112
Employee Exposure Determination .....	112
Infection Control Competencies .....	117

<b>Chapter 6: Patient Education.....</b>	<b>121</b>
Introduction .....	121
Teaching Your Patients.....	121
General Infection Control Principles Within the Healthcare Facility for Homebound Residents .....	123
<b>Chapter 7: Quality Improvement and Infection Control.....</b>	<b>127</b>
Introduction .....	127
The Role of Infection Control in Quality Improvement.....	127
Tracking and Trending Infections.....	129
Examining Cause.....	131
Some Common Techniques to Help Quantify Your Analysis .....	133
Some Simple Statistical Procedures to Help With Infection Control Analysis .....	135
<b>Chapter 8: Resources and References.....</b>	<b>145</b>
Introduction .....	145
Glossary .....	145
Resources.....	157
References .....	159

# Purposes and Objectives

## Introduction

The necessity for a sound infection control program in long-term care cannot be understated. In fact, in any area of healthcare, infection control is of paramount importance. This is well documented by the sheer number of nosocomial (health facility acquired) infections and iatrogenic (conveyed to patients through healthcare provider contact) infections each year. Infection control practices must be understood to varying levels by all healthcare professionals, regardless of whether one is an administrator, director of nursing, physical therapist, physician, or dietician. Only through a well-implemented comprehensive infection control program can healthcare facilities effectively limit the spread of infections among patients and workers.

This book can be a template for all healthcare organizations; however, it is specifically focused toward the long-term care environment. While a bacterial or viral agent does not change from one healthcare environment to another, certain infectious agents may be more commonly found in certain environments based on the specificity of clientele that they serve. This book will examine the nature of infection control as it is specifically related to the long-term care environment.

Effective infection control programs need all individuals in the healthcare facility to have varying levels of education and knowledge to forestall the transmission of infectious agents that can become epidemic in the healthcare facility. Certain individuals, such as the infection control nurse or medical director, are expected to have greater levels of knowledge regarding infection control. However, an effective infection control program must pervade all aspects of the environment in order to enhance the health and wellbeing of all residents and workers alike.

The objectives discussed in this chapter will guide the development and evaluation of an infection control program and drive the coordination of activities so that the reader will be able to employ a coordinated and systematic endeavor to successfully implement an infection control protocol with an organizational mindset. This chapter will lay the foundation for the rest of the book. It will start with explaining why infection control is so critical for long-term care. It will also acquaint the reader with what a sound infection control program provides to the long-term care environment.

## The Purposes of an Infection Control Program

Think of the purposes of an infection control program as its intended results—what does it attempt to accomplish? Here are some purposes to consider for your program.

### **Control the transmission of infection among the long-term care staff, its residents, and the residents' families**

To accomplish this, an infection control program needs to:

- Create policies and procedures that address infection control issues
- Ensure that the care for each patient consistently incorporates appropriate and correct infection control practices
- Educate staff, residents, and family members on relevant infection control issues and practices
- Monitor infection control trends
- Take action to improve care delivery in light of infection control principles

### **Ensure compliance with regulations**

The *Conditions of Participation* expect the healthcare organization to maintain an effective infection control program as part of its overall quality assessment and performance improvement efforts. Surveyors scrutinize care delivery practices during the survey process, and an increasingly important area of concern is infection control.

Government agencies such as the Occupational Safety and Health Administration (OSHA) and the Centers for Disease Control and Prevention require the agency to enforce the use of stringent hand washing techniques, follow universal precautions and infection control principles, and implement exposure control programs.

Finally, healthcare organizations must also comply with local laws regarding the reporting of communicable diseases to local health departments, as well as follow these local organizations' guidelines for properly handling and disposing of contaminated materials and infectious waste.

Given the large array of federal, state, and community level organizations that often demand compliance on infection control issues such as monitoring and reporting of communicable illnesses, the Centers for Medicare and Medicaid Services (CMS) have amalgamated all of these agency concerns on infection control, including their own, and developed an overriding regulatory requirement. This regulation is often referred to as F-tag 441. It reads as follows:

### F-tag 441

F441 (Rev. 127, Issued: 11-26-14, Effective: 11-26-14, Implementation: 11-26-14)

#### **§483.65 Infection Control**

The facility must establish and maintain an Infection Control Program designed to provide a safe, sanitary and comfortable environment and to help prevent the development and transmission of disease and infection.

#### **§483.65(a) Infection Control Program**

The facility must establish an Infection Control Program under which it:

- (1) Investigates, controls, and prevents infections in the facility;
- (2) Decides what procedures, such as isolation, should be applied to an individual resident; and
- (3) Maintains a record of incidents and corrective actions related to infections.

#### **§483.65(b) Preventing Spread of Infection**

- (1) When the Infection Control Program determines that a resident needs isolation to prevent the spread of infection, the facility must isolate the resident.
- (2) The facility must prohibit employees with a communicable disease or infected skin lesions from direct contact with residents or their food, if direct contact will transmit the disease.
- (3) The facility must require staff to wash their hands after each direct resident contact for which hand washing is indicated by accepted professional practice.

#### **§483.65(c) Linens**

Personnel must handle, store, process and transport linens so as to prevent the spread of infection.

The above regulation was taken from CMS' State Operations Manual. F-tag 441 deals with the promulgation of regulatory requirements dealing with infection control. Infection control has taken on a greater importance in long-term care due to the increasing numbers of often preventable hospitalizations related to infections. Also, the ever-increasing level of antimicrobial resistance has been a driving force in heightened regulatory surveillance given by surveyors to infection control issues in long-term care. Moreover, the need to provide a safe and healthy long-term care environment that minimizes the communicable transmission of disease-causing pathogens to residents, workers, and visitors is the goal of this important regulation.

Long-term care environments deal with those who are sick and often quite infirm. Minimizing the transfer of often preventable infectious agents has become an increasing priority. Eliminating unneeded hospitalizations due to preventable infections helps to minimize runaway costs that are found in our healthcare system, and controlling the transmission of pathogenic agents to already sick and frail individuals can prevent these individuals from needlessly becoming more ill or even dying. Finally, a strong infection control program saves money for the healthcare facility on the operational level and provides for a more functional resident population, as well as a healthier workforce.

The rationale for starting this book with CMS' regulatory requirement for infection control is that a clear delineation of this regulation will be the framework for the rest of the book. Since the regulation has become increasingly paramount in the minds of surveyors, it also needs to be paramount in the minds of those who work within the long-term care environment. This book is specifically aligned to address the importance of the infection control requirement with the hope of helping to prevent long-term care facilities from receiving the often-cited F-tag 441 for noncompliance in this area.

## **Ensure compliance with state and federal regulatory standards as well as accrediting organizations**

For long-term care, especially nursing home regulatory compliance, state and federal requirements are of foremost importance. However, since many healthcare facilities, including long-term care facilities, are seeking additional accreditation with organizations such as The Joint Commission, infection control standards are closely scrutinized. Even OSHA, with its fairly recent focus on long-term care facilities, has taken an interest in infection control, bloodborne pathogens, and proper protection for workers in these organizations. One of the most important needs within a long-term care organization is an infection control program that implements and coordinates policies and procedures to lower the risk of infection among staff, patients, and family members, and to improve the trends and rates of infections. An effective infection control program includes:

- Infection control policies and procedures to provide education, surveillance, identification, reporting, prevention, and control of infections
- Uniform compliance guidelines for universal blood and body fluid precautions and consistent monitoring procedures
- Ways to evaluate the efficiency of their infection control programs

## **Ensure timely response and appropriate actions in cases of resident infections and exposure incidents**

The agency must have methods to identify and track infections and exposure incidents, as well as mechanisms to improve performance and reduce adverse events. These should be part of your quality assurance program, which along with the infection control committee, should make sure that proper tracking methods are being implemented assiduously and correctly. More will be said about monitoring and tracking later in this book.

## **Validate that agency policies and procedures incorporate infection control principles**

Each of an agency's policies and procedures must reflect sound infection control theory and practice. The agency must establish a method to develop, implement, review, and revise policies and procedures. Moreover, these policies must not be formulated in a cursory manner, but must be based on appropriate empirical support and scientific evidence. It is important that the policies and procedures that are implemented are efficacious as demonstrated by scientific support for their use and implementation.

## **Ensure that documentation in clinical records, incident reports, and staff health records is accurate and demonstrates appropriate services and actions**

The long-term care facility must maintain records supporting their actions and interventions. Documentation must accurately reflect compliance with regulations and standards and demonstrate that the healthcare facility provides appropriate services, that meet appropriate standards to maintain the health and safety residents and workers.

## **Ensure that the agency's quality improvement processes incorporate and address infection control issues**

In order to succeed, a long-term healthcare facility's quality assessment and improvement program and committee (QA) must integrate all important infection control processes, such as tracking the types of infections occurring each month, possible location of the infection's source, reports on any cultured organisms that may pose more than an ordinary risk to the long-term care community, as well as records for preventative interventions, such as vaccinations for residents and workers alike. These are just a few of the things that need to be targeted by an infection control committee as part of the QA process.

## The Objectives of an Infection Control Program

Clear objectives drive an infection control program. Remember, objectives are different from goals in that they are more specific and explain how you will carry out your program. You need to make sure your objectives are not only clear, but realistic. In order to satisfy regulatory and accreditation requirements and keep your staff and residents safe from infection, you should strive to meet the following objectives in your infection control policy.

### Describe the scope and requirements of the infection control program

- List those staff who are required to participate in the infection control program
- Make sure each staff member's requirements and responsibilities are specifically outlined
- Define areas of responsibility and accountability for education, monitoring, and follow-up
- Include discussion on staff and patient communicable diseases
- List all the procedures that staff must practice throughout care delivery

### Implement a comprehensive staff education program

- Outline the kinds of material you will teach staff, residents, and residents' families regarding infection control practices
- Educate staff on every aspect of your infection control program, including identifying parameters for ongoing education
- Establish guidelines for resident education on infection control techniques in the home

### Establish a clear sequence of events in the surveillance, identification, reporting, prevention, and control of infection to ensure appropriate services and timely action

**Surveillance, identification, and prevention** are probably the most important factors for infection control. In an era when we have an increasing number of pathogens that are no longer responsive to many antibiotics available, the best way to treat infections and infectious potentialities is to eliminate them before they happen or attack them during their incipient stages.

- Define all of your infection control procedures (e.g., hand washing, universal precautions, nursing bags, personal protective equipment, etc.) intended to reduce the spread of infection among staff, residents, and residents' family members
- Devise a reporting mechanism when new infections and exposure incidents are suspected
- Identify the source and extent of the problem, as it possibly could exist if nothing is done
- Specify procedures for monitoring the status of known infections (in both staff and resident populations) and medical follow-up for exposure incidents
- Develop the exposure control plan—review and update it annually to ensure all staff are trained accordingly
- Create guidelines for hepatitis B vaccinations and TB skin testing
- Implement a respiratory protection plan
- Track and report all infections
- Evaluate your research, and plan and implement a control strategy

## **Demonstrate compliance with local, state, and federal laws, requirements, and accreditation standards**

- Check all federal and state regulations and accreditation standards, identify their intent, and recognize how to demonstrate compliance in everyday care delivery practices
- Establish guidelines for the infection control practices, handling, and disposal of infectious waste to comply with these requirements (e.g., proper disposal of biohazard elements such as waste and needles)

## **Provide methods for accurate documentation in clinical records, incident reports, and staff health records**

- Define the frequency for clinical record review related to infection control practice and surveillance
- Specifically define who will be responsible for these reviews—especially in addition to the medical director and director of nursing
- Establish how staff are to document their adherence to infection control policies
- Review incident report forms and infection logs to ensure accuracy
- Maintain confidentiality of staff medical information, and make sure it is in separate files from other personnel information
- Inform and remind staff of the absolute necessity for complete documentation and follow-up of all observations

## **Establish guidelines for staff interaction with residents, families, caregivers, and coworkers that promote appropriate surveillance, prevention, and control of infection**

- Set risk assessment guidelines to evaluate the healthcare environments after discharge for resource availability problems (e.g., no running water in the home, pest infiltration, etc.) and knowledge deficits of family caregivers (e.g., the only caregivers who may not have a sound understanding of assisting the resident after discharge with such things as wound care utilizing an aseptic field)
- Create guidelines for identifying resident and family education issues

## **Ensure adequate data collection, analysis, assessment, and interpretation of infection findings**

- Maintain adequate data collection regarding infection information, staff exposure, and trends within your resident census
- Identify the specific resident populations and procedures with higher probabilities of infection or exposure risk
- Commit quality resources to analyze infection trends and initiate action plans if infection rates in the agency exceed acceptable limits

## **Develop specific objectives and outcome measures to assess the effectiveness of the infection control program**

- Formulate an infection control committee to carry out the objectives of the program, assess whether the program is meeting its goals, and evaluate the program quarterly (but preferably monthly) for any needed changes or updates
- Integrate the committee activities with the healthcare facility's quality assessment and process improvement program (QAPI)

<b>INFECTION CONTROL PROGRAM</b>	
<b>Purpose(s):</b> The purpose of [facility name]’s infection control program is to guide our employees in the prevention of and/or limit the exposure to infectious diseases and/or infections.	
<b>Objectives:</b>	
<ol style="list-style-type: none"> <li>1. Decrease risk of exposure to infections</li> <li>2. Decrease risk of exposure to infectious diseases</li> <li>3. Reinforce staff knowledge of infection precautions/prevention</li> <li>4.</li> <li>5.</li> <li>6.</li> </ol>	
Signature	Date
Signature	Date

Although this book attempts to provide considerable coverage of infection control, it is by no means an exhaustive compendium of the topic. However, the goal is to provide long-term care staff with a better knowledge of infection control. It is not just targeted at a small group of individuals with select skills. Its goal is to help enhance the skills of all professionals within long-term care. Therefore, although some information may be more relevant for some professionals than others, the goal is to provide broad coverage of the many facets of infection control that can have some applicability for all long-term care professionals. In addition, it is the hope that those who read this book will find it relevant toward maintaining compliance with CMS’ regulatory requirements in this area as well as helping to build a culture within long-term care that is increasingly knowledgeable about infection control and sensitive to its concerns.

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**BRIAN GARAVAGLIA, PhD**

Among long-term care (LTC) facilities, infection control violations make up one of the most common survey deficiencies. This book gives LTC professionals the tools and guidance to remain compliant with the government's infection control policies. Acting as a one-stop reference, this resource offers staff quick and convenient access to procedures, policies, and forms. In addition to the information provided within the book, you'll get online access to in-service training that will help the entire department prepare for survey day.

**This comprehensive manual includes the following:**

- CMS' regulations to F441, infection control
- The most up-to-date government regulations in an easy-to-apply format
- Staff training in-services
- Sample policies, procedures, and forms to help facilities stay compliant and promote resident well-being
- Tips for teaching patients and caregivers about infection control

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