

Infection Prevention, Control & Immunizations

Determine the percentage of staff vaccinated and when to cite F888 in ASE-Q or LTCSP: (*Refer to the surveyor instructions section III on the COVID-19 Staff Vaccination Matrix*)

- If the percent vaccinated is less than 100% of all staff have received at least **one dose of a single-dose vaccine**, or **all doses of a multiple vaccine series**, or have been **granted** a qualifying exemption, or identified as having a temporary delay recommended by the CDC, cite F888.

Record Review, Staff Interviews, and Observations:

- Randomly select 4 staff from the completed COVID-19 Staff Vaccination Matrix, as described below, unless concerns exist for specific staff (e.g., complaints, infection control practice observations).
- 2 vaccinated direct care staff
 - 1 certified nurse aide (CNA).
 - 1 additional direct care staff.
 - 2 unvaccinated staff (if available)
 - 1 unvaccinated staff with exemption or temporary delay.
 - 1 unvaccinated staff with a medical exemption.

Note: *If there are no staff available who are not vaccinated, you may substitute a staff who has been granted a non-medical exemption, if available, to ensure additional precautions are in place.* If the surveyor identifies any staff that were not vaccinated and were not granted an exemption or have a temporary delay (and weren't marked as such on the staff matrix), that individual(s) should be added to the sample.

- Ask the facility for information on how they ensure that their contractor staff are compliant with the vaccination requirement.
- From the list of contracted companies provided by the facility during the entrance conference, select 2 contract companies (1 direct care and 1 non-direct care). Ask the facility for a list of contracted staff from each of the two companies selected who are scheduled to provide services during the survey. Randomly select 2 contracted staff from each list.
- 2 direct care contracted staff
 - 2 non-direct care contracted staff
- Ask the facility to obtain the contracted staff vaccination status for these individuals from the contract company.

Note: If there are no contracted staff scheduled to be onsite during the survey or observed by the surveyor, you do not need to increase the sample size for another category. Failure of contract staff to provide evidence of vaccination status reflects noncompliance and should be cited at F888

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under the requirement to have policies and procedures for ensuring that all staff are fully vaccinated, except for those staff who have been granted exemptions or a temporary delay at §483.80(i)(3)(ii).

- Observe and interview sampled staff who are not vaccinated to ensure additional precautions noted in the facility's policies and procedures, are in place to help prevent the spread of COVID-19.
 - If reassigned: When were you reassigned duties?
 - Are you being tested for COVID-19? If so, how often?
 - Observe staff to determine whether they are using additional CDC-recommended precautions, *such as* universal source control (use a NIOSH-approved N95 or equivalent or higher-level respirator for source control) and maintaining physical distance including areas that are restricted from resident access (e.g., staff meeting rooms, kitchen).
 - Determine whether other additional precautions are in place to mitigate the transmission of COVID-19.
 - NOTE: The examples above are not all inclusive, and represent actions that can be implemented, however, facilities can choose other precautions that align with the intent of the regulation which is intended to “mitigate the transmission and spread of COVID-19 for all staff who are not fully vaccinated.”
 - *NOTE: Regardless of a facility's compliance with the staff vaccination requirements, closely investigate infection prevention and control practices at F880 to ensure proper practices are in use, such as proper use of personal protective equipment, transmission precautions which reflect current standards of practice, and/or other relevant infection prevention and control practices are in place, which are designed to minimize transmission of COVID-19.*
- For sampled staff, determine whether the COVID-19 vaccination documentation includes the following:
 - Screening and eligibility to receive the vaccine(s); and
 - The provision of education related to the COVID-19 vaccines such as the benefits and potential side effects; and offering of the COVID-19 vaccines to staff by the facility per requirements at 42 CFR §483.80(d)(3), F887.

Note: These provisions do not apply to sampled staff that received their vaccination outside of the facility.

- For sampled **vaccinated staff and contracted staff**, determine whether the facility or contract company documented the vaccination status for:
 - a single-dose COVID-19 vaccine, or
 - all required doses for a multi-dose COVID-19 vaccine, and
 - a [booster dose](#).
- For the sampled **unvaccinated staff**:
 - For staff who **do not have an exemption or reason for temporary delay**, ask the following:
 - Are you scheduled to receive a COVID-19 vaccine? If so, confirm the staff is scheduled.
 - If the staff isn't scheduled to receive a vaccine: Do you have a request for exemption pending?
 - When did the facility become aware staff did not have an exemption or reason for temporary delay?

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- What actions did the facility take to educate and offer COVID-19 vaccines to staff?
- What actions did the facility take when staff indicated that they will not get vaccinated and do not qualify for an exemption?
- For staff who have requested and/or are granted **medical exemption**, verify facility records are tracked, secure, and include the following:
 - Which COVID-19 vaccine is clinically contraindicated;
 - [The recognized clinical reasons](#) for the contraindication;
 - A statement by the practitioner recommending the staff member be exempted from the COVID-19 vaccination requirement; and
 - A signature and date by a licensed practitioner who is not the individual requesting the exemption.
- Review facility records and interview staff and/or contracted staff to confirm the facility has instituted the contingency plan, if needed:
 - Verify the actions taken by the facility for any staff who indicated they would not get vaccinated and were not qualified for an exemption?
 - When was staff given a deadline to receive the first dose of a vaccine? Confirm the date.
 - If the deadline has passed: What actions were taken?

16. Did the facility implement their policy and procedures to ensure:

a) all staff are vaccinated for COVID-19;

b) vaccination status is tracked, and documentation is secure for staff with an exemption; and

c) contingency plans are developed and followed?

Yes No **F888** N/A, (*investigation not required or* in substantial compliance with no substantive changes since last review in the previous six weeks)

Educate and Offer COVID-19 Immunizations for Staff at Requirement 483.80(d)(3)

- May use the same sampled staff used for the testing requirement at CE #7 (i.e., three staff, including at least one staff member who was confirmed COVID-19 positive or had signs or symptoms consistent with COVID-19) to determine compliance with CE #17.
- Review the facility's policies and procedures related to COVID-19 vaccination and ask the facility:
 - What efforts has the facility made to obtain the COVID-19 vaccine? How was information provided to staff on obtaining the vaccine if it was not available?
 - How are staff educated on the benefits and potential side effects before being offered a vaccine including any additional dose?
 - How are staff vaccination status tracked or documented?
 - How are staff screened for eligibility (e.g., medical contraindications, previous vaccination), vaccines offered, and consent or refusal is obtained?

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17. Did the facility maintain staff documentation of screening, education, offering, and current COVID-19 vaccination status?

Yes No F887

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