

ISSUE 7 / JULY 2020



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NEW REGULATIONS IN LONG TERM CARE FOCUS ON INFECTION PREVENTION

Environmental services is at the forefront

In the midst of a pandemic; new regulations and guidance; increased training and certifications; new equipment and chemicals; and the uncertainty of the workforce; now may be the time to consider outsourcing your Environmental Services staff.

WHITEPAPER

ISSUE 7 / JULY 2020



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INFECTIOUS DISEASE MITIGATION

Outsourcing Environmental Services or Housekeeping is not new. Many Long Term Care Facilities (LTCF) have outsourced these services to companies that specialize in cleaning, sanitizing and disinfecting. Those LTCF that have kept these services in house, usually to control costs, believe that managing these services is more cost effective than outsourcing and that by doing so, they maintain a sense of control over the services.

With increased regulations and scrutiny of LTCFs by Centers for Medicare & Medicaid Services (CMS); Occupational Safety & Health Administration (OSHA); Association for Professionals in Infection Control and Epidemiology (APIC) and others, Environmental Services has taken the spotlight. Many in house staffs are trained to handle the day-to-day cleaning

and sanitizing but may be ill-equipped to handle disinfecting with proper Personal Protection Equipment (PPE), electrostatic disinfecting equipment and chemicals approved for proper disinfecting. This is where an outsourced Environmental Services Company comes in.



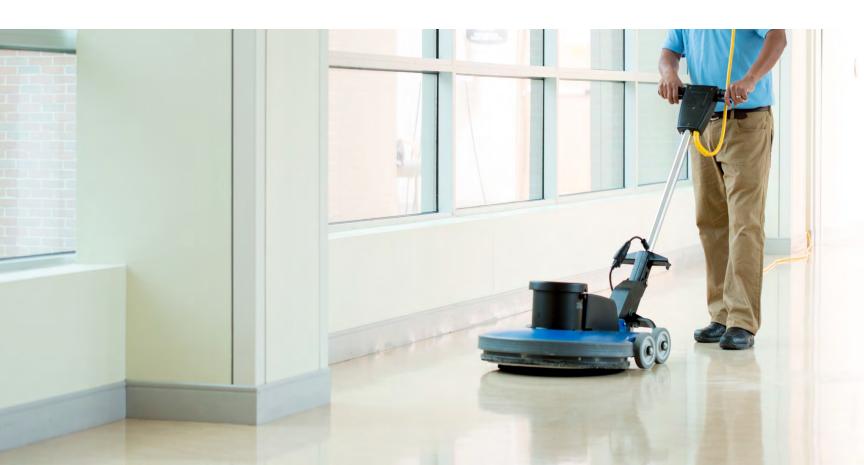


Outsourcing Environmental Services adds a layer of security to the housekeeping and laundry services. These companies have extensive training programs on the use and application of PPE, equipment and chemicals. The infection preventionist's (IP) duties are lessened when an outsourced partner takes on these responsibilities and ensures the IP's plan is followed, thereby allowing them to monitor, audit and maintain infection prevention and control (IPC) practices.

There is increasing evidence that the environment in healthcare facilities can be a reservoir for infectious agents such as bacteria, fungus and viruses.¹ Cleaning, disinfecting, and storing equipment and supplies is important in preventing the transmission of potential pathogens within the long-term care (LTC) facility.² To control the spread of infectious agents, the Environmental Services staff must be familiar with the application and use of chemicals and equipment, as well as the methods of how they should be stored.

The Centers for Disease Control and Prevention (CDC) provides guidelines for cleaning and disinfecting for schools and workplaces, recommending the use of EPA-registered disinfectants. However, they also make reference to the use of bleach with the disclaimer: "if appropriate for the surface." Bleach, while effective against viruses, can be harmful to people and surfaces when not used correctly. Professional Environmental Services companies will typically avoid the use of bleach and instead use chemicals that are safer for people and surfaces and require a specific "dwell time" to kill microbes like viruses.

Researchers have found that pathogens in concentration great enough to transmit infection can spread from residents to surfaces.⁴ Incomplete cleaning and disinfection procedures, combined with the persistence of pathogens in the environment, increase the risk that the hands of healthcare personnel will become contaminated.



ENHANCED ROLE OF THE INFECTION PREVENTIONIST

Given the nature and resident population served (e.g. older adults often with underlying chronic medical conditions), nursing home populations are at high risk of being affected by respiratory illnesses like COVID-19 and other pathogens.⁵

On November 28, 2019, Phase Three of the Centers for Medicare & Medicaid Services (CMS) Final Requirements of Participation (ROP) for long-term care facilities went into effect. Additionally, the updated guidance from the CDC in May, 2020, suggests that: "Facilities should assign at least one individual with training in IPC to provide on-site management of their COVID-19 prevention and response activities." In the month prior, CMS announced the establishment of

a new independent Commission that will conduct a comprehensive assessment of the nursing home response to the 2019 Novel Coronavirus (COVID-19) pandemic. This builds upon the agency's five-part plan unveiled in April of 2019 to ensure safety and quality in America's nursing homes. The Commission is expected to develop recommendations on three key areas:





1. PROACTIVE RESPONSE

Putting nursing home residents first by ensuring they are protected from COVID-19 and improving responsiveness of care delivery to maximize the quality of life for residents;

2. IDENTIFICATION AND MITIGATION

Strengthening efforts to enable rapid and effective identification and mitigation of COVID-19 transmission (and other infectious disease) in nursing homes; and

3. **COMPLIANCE**

Enhancing strategies to improve compliance with infection control policies in response to COVID-19.

Failing to comply with these rules, LTCF not only jeopardize the well-being of those in their care, but also risk their accreditation and/or financial penalties.



I considered outsourcing for years. I was hesitant because I thought I would lose control of my Environmental Services Department. I not only saved some money, but the cleaning is better and done more consistently. Best of all, the headaches associated with running this department went away. We have enough on our plate, and our EVS provider runs this department more efficiently than we could.

AKSHAY TALWAR

Owner and Operator of Briarcliffe Manor



THE ENVIRONMENTAL SERVICES STAFF

With all of the additional focus on LTCF and the increased role of the IP, the cascading effect is more responsibility on the Environmental Services staff and their processes and procedures.

In-house environmental services' staff may be well-equipped to handle day-to-day cleaning and even sanitizing. When it comes to disinfecting however, specialized equipment, chemicals, PPE, training and procedures are often necessary. Outsourcing the environmental services affords a LTCF with an expertise in not only effective cleaning but disinfecting, too.

At the onset of the recent COVID-19 pandemic, many in-house environmental staffs were at a disadvantage when it came to sourcing equipment and chemicals. Simply having a list of chemicals approved by the EPA is not enough. When demand spiked, chemical distributors worked with their current customers to provide disinfectant and sanitizers to ensure they were receiving the quantities they required. Lacking a relationship with a national buying organization or with a large distributor, meant some had to wait until product became available. The same went for disinfecting equipment like electrostatic spraying equipment which most facilities that use in-house staff might not even be able to afford to add, even if they could procure it from a supplier.

The IP's role requires that they are familiar with the types of products being used and also the circumstances under which the products are being used. Chemicals differ in what pathogens they should be used against and the specific "dwell time" required to kill the pathogen. Some products may dry before reaching the dwell time and required repeated applications. The IP must also be aware of the specific use cases for different kinds of equipment. Budget dollars may have to be reallocated due to the improper use of equipment that may require down-time to remedy. Products approved by the CDC should also be evaluated based on its safety for residents and staff and potential damage to equipment and/or the environment.

Simply having a list of chemicals is not enough.

CLEANING, SANITIZING AND DISINFECTING

Many in-house Environmental Services staff are now being asked to perform duties that are beyond the scope of their expertise. Disinfecting for infectious disease is included in these expanded duties and there is a lack of understanding as to what this terminology really means.

Sanitizing, cleaning, and disinfecting are frequently interchanged in discussions even though there are differences between them.

A disinfectant is a chemical that completely destroys all organisms listed on its label.⁶ From the EPA guidelines, disinfectants must reduce the level of pathogenic viruses and bacteria by 99.999 percent during a time frame greater than 5 minutes but less than 10 minutes.⁷ A sanitizer is a chemical that reduces the number of microorganisms to a safe level. It doesn't need to

eliminate 100 percent of all organisms to be effective. Sanitizers do not kill viruses.

Cleaning often means simply removing visible soil and dirt, and does not truly protect anything or anyone from pathogens. To sanitize or disinfect a surface, the surface must first be cleaned, removing visible dirt from the surface. Disinfecting chemicals all have a dwell time or the time that the chemical must be in contact with the surface before it can be removed.





Adding to the current scope of work with these new requirements, puts the ES staff and the IP at risk. This is when it may be time to consider outsourcing the ES

department to a contractor that specializes in cleaning, sanitizing and disinfecting Long Term Care Facilities and can be a supportive partner for the IP.



We outsourced our housekeeping department just in time. We made the decision just before the start of the COVID-19 crisis. It was the best decision we made. Our housekeeping company has done a better job in the overall cleaning and has been an integral part of helping us through this crisis with the proper disinfectants, infection control procedures and management support.

CHAD HARRIS

Owner and Operator of Harris Health Care Center North



IS OUTSOURCING THE ANSWER?

Increasingly, nursing homes are outsourcing their housekeeping duties to companies with extensive infection control experience. This decision helps protect residents from preventable illnesses and has other important benefits.

Professional ES companies make a science of cleaning. Experienced trainers with knowledge of infectious diseases teach advanced cleaning and disinfecting methods as well as acceptable products to be used for specific applications. Performance is consistently evaluated to achieve best outcomes. This type of constant quality control helps ensure the surfaces and materials in the facility are free of harmful pathogens.

Cleaning methods have changed dramatically over the past several years. Old-fashioned mops and brooms are no longer recommended. Neither is bleach or cleaning products with strong fragrances. Instead, ES partners use microfiber cleaning pads and vacuums with HEPA filters to capture dust and dirt particles and remove them, rather than stir them into the air. EPA-registered, hospital grade cleaner disinfectants not only clean, they kill pathogens that cause illnesses.

Outsourcing also removes the requirement for recruiting, interviewing, hiring, training and staffing. All of those functions are performed by the ES partner. Having an ES partner that defines the scope of work (SOW) as part of the Infection Prevention Plan applies accountability and responsibility to the contractor, all while being minimally supervised by the IP. In other words, outsourcing allows the LTCF to focus on their core business – resident care.

Cost control can also be a consideration for outsourcing. ES partners provide competitive wages, benefits and career paths for their ES staff and focus on controlling turnover to ensure consistency and increased quality. ES partners provide reporting and can develop KPIs that support the IP and the requirements for compliance.

IS OUTSOURCING SUCCESSFUL?

It all may sound too good to be true but those LTCF's that have outsourced rarely, if ever, return to an in-house staff. The management of the staff is the ES partner's responsibility and keeping abreast of the latest technology, supplies, standards and requirements are all necessary as a continuous improvement process. Relying on the ES provider takes those LTCF's out of the cleaning and laundry business, giving them more time to focus on patient care.

It is important to remember that not all facilities are a good fit for outsourcing. The infrastructure cost of an ES partner usually dictates that a facility with less than 80 beds may be a challenge to effectively outsource. That doesn't mean it can't work with less than this number, so you should check with an ES partner before disqualifying outsourcing.



CONCLUSION

The COVID-19 pandemic exposed weaknesses and gaps in a number of areas and because of it, environmental services staffers have taken the spotlight. In LTCF's it's even more important because these residents have nowhere else to go, the facility is their home. Various government agencies are providing guidelines, recommendations and new regulations to protect these residents and for some facilities, this will be an increased burden on their infrastructure.

There is a solution. When an LTCF partners with an ES company that specializes in cleaning, sanitizing and disinfecting, the burden is lifted and the partner shares the responsibility and can alleviate some of the unknown issues surrounding disinfecting high touch areas, electrostatic spraying, and PPE along with assuming the responsibilities for hiring, training, and staffing the ES Team Members.

Predictably, this won't be the last pandemic but as a response, it may be time to talk with an ES partner that can get through this current pandemic and be prepared for the next one.

¹Infection Prevention Guide to Long Term Care, 2nd Edition, APIC, Association for Professionals in Infection Control and Epidemiology, 2019

²lbid

³Centers for Disease Control and Prevention, Coronavirus Disease 2019, Cleaning and Disinfecting Your Facility, April 2020

⁴Centers for Medicare and Medicaid Services, State Operations Manual. Appendix PP: Guidance to Surveyors for Long Term Care Facilities. Rev. 173, 11-22-17.

⁵Centers for Disease Control and Prevention, Preparing for COVID-19 in Nursing Homes, May, 2020

⁶ISSA, The Difference Between Sanitizing and Disinfecting, April 23,2018

⁷lbid



At 4M, we have more than 30 years' experience in Environmental Services, supporting Long Term Care Facilities. We take this seriously because we understand that the residents are someone's mother, father, grandmother, grandfather or another family member and they could be ours. In fact, that's how we got started – cleaning a nursing home for a family member. With us, it's personal. To learn more, contact us here.