

THE ADVISOR

MONTHLY COMPLIANCE COMMUNICATOR

Promoting Hand Hygiene in Healthcare: A Critical Measure for Infection Control

Hand hygiene is known to be the single most critical measure for reducing the transmission of organisms (infectious agents) to patients and each other. Performing hand hygiene helps prevent the spread of infection and is one of the most important parts of infection control in healthcare facilities. Hand hygiene includes hand washing with soap and water, antiseptic hand wash, alcohol-based hand rub, and surgical antisepsis. Our focus will be on soap and water handwashing and alcohol-based hand rub for hand hygiene.

In hospitals, improper or total disregard of hand hygiene has resulted in outbreaks of infections. Within hospital settings, studies have shown a less than 40 percent adherence to hand hygiene. Some of the most frequent reasons given for the lack of hand hygiene among healthcare personnel are:

- Inaccessible products,
- Products cause skin irritation,
- Healthcare providers are too busy to perform hand hygiene and it interfered with patient care,
- Workers were wearing gloves and felt hands were not contaminated,
- They just didn't think about it, and
- They lacked the knowledge of when and how to perform hand hygiene.

Hand washing with soap and water should take place when hands are visibly soiled or dirty, before eating, after going to the restroom, and after providing care for a patient with diarrhea.

The proper sequence to hand washing is shown in the following steps:

1. Wet hands first with water.
2. Apply plain or antimicrobial soap to hands and rub hands together to create a lather.

Newsletter Content

[Promoting Hand Hygiene in Healthcare: A Critical Measure for Infection Control](#)

[Understanding Sanction Screening: Safeguarding Healthcare Integrity Under HIPAA](#)

[It's Your Call](#)

[OSHA and Electrical Violations](#)

3. Vigorously rub hands for at least 30-40 seconds, ensuring to cover all surfaces of hands and fingers.
4. Rinse with water, dry with a disposable towel, turn the faucet (if manual) off with the towel.

Alcohol-based hand sanitizers are preferred if hands are not visibly soiled. Hand sanitizers should have at least 60% alcohol or higher in them. The proper steps for using alcohol-based sanitizer are as follows:

1. Apply the specified amount of the product from manufacturer. Healthcare personnel should follow the manufacturer's instructions on the amount of sanitizer to be used.
2. Rub hands together, covering all surfaces of hands and fingers.
3. Continue rubbing hands until all surfaces of the hands are dry. This process should take 20-30 seconds.

Each facility should have and consider these elements to be included in a hand hygiene program. The infection control officer should involve staff in the selection and evaluation of hand hygiene products. Lotions should be considered and provided that are compatible with soaps and alcohol-based hand rubs.

Artificial nails and long natural nails should not be worn when providing direct patient care, as they compromise the efficacy of handwashing. Artificial nails have been linked to disease outbreaks in high-risk hospital settings. Bacteria can adhere to artificial nails making it impossible to properly clean. They can also cause gloves to tear and are not recommended for healthcare workers.

Hand hygiene education should be provided at the time of hire and no less than annually thereafter. Compliance with recommended hand hygiene practice should be monitored and findings reported back to staff on a routine basis. Input from staff on the hand hygiene program is an important part of compliance.

We have seen an increase in respiratory illness, flu, RSV, and COVID in the U.S. During respiratory illness season, healthcare workers should ensure and perform hand hygiene regularly throughout each day. Clean hands are an important defense against spreading infections. If you need assistance with ensuring your office is meeting compliance expectations, [reach out to TMC today](#). We have decades of experience and can make sure you and your staff are safe and compliant during this busy season.

[Understanding Sanction Screening:](#) [Safeguarding Healthcare Integrity Under](#) [HIPAA](#)

In the intricate landscape of healthcare, compliance with regulations isn't just a choice but a necessity. HIPAA stands as a beacon of privacy and security standards within the industry. Among its many components, one crucial element often overlooked yet central is sanction screening.

What is Sanction Screening?

Sanction screening involves the meticulous examination of individuals and entities involved in healthcare to ensure they're not excluded from federal or state healthcare programs. These screenings search through various databases containing records of individuals or organizations barred from participating in Medicaid, Medicare, or other federal/state healthcare programs due to fraud, abuse, or other offenses.

Why is Sanction Screening Vital Under HIPAA?

1. **Regulatory Compliance:** HIPAA mandates the protection of patient information and the prevention of fraudulent practices. Sanction screening aligns with these objectives by identifying and excluding individuals or entities involved in malpractices, thus upholding HIPAA compliance.
2. **Patient Safety:** Patients deserve care from credible and trustworthy healthcare providers. Sanction screening helps maintain this by preventing unauthorized or shady entities from accessing patient information or delivering healthcare services.
3. **Financial Integrity:** Fraudulent practices not only compromise patient well-being but also strain financial resources within the healthcare system. Screening out sanctioned individuals or entities contributes to preserving the financial integrity of healthcare programs.
4. **Reputation Management:** Healthcare providers, institutions, and organizations strive to maintain an untainted reputation. Engaging with sanctioned entities could damage this reputation irreparably, leading to loss of trust among patients and partners.

The Process of Sanction Screening

Sanction screening involves regular checks against various databases to ensure that healthcare providers, employees, contractors, and vendors are not on any exclusion lists. Automated tools expedite this process, flagging potential matches for further manual review.

In a realm where patient well-being and data security are paramount, sanction screening emerges as a crucial safeguard. Compliance with HIPAA isn't just about meeting regulatory requirements; it's about fostering a culture of trust, integrity, and excellence in healthcare.

As the healthcare landscape evolves, the importance of sanction screening under HIPAA remains steadfast. Its role in preserving patient trust, financial stability, and regulatory adherence cannot be overstated. Embracing this practice isn't just a choice but an imperative step towards fortifying the very foundation of the healthcare ecosystem.

Ensuring compliance with HIPAA through sanction screening isn't just a checkbox exercise; it's a commitment to maintaining the highest standards of patient care, confidentiality, and ethical conduct within the healthcare industry.

[It's Your Call – January 2024](#)

HIPAA: What happens if we employ an individual who is found to be on an exclusion list?

If you employ an individual who has been sanctioned or excluded by the Office of Inspector General (OIG) from participating in federal health care programs, and that individual provides reimbursable items or services under such programs, you may face Civil Monetary Penalty (CMP) liability. This liability could amount to fines of up to \$10,000 for each item or service provided by the excluded individual, listed on a claim submitted for reimbursement under a Federal/State program. Additionally, there might be an assessment of up to three times the claimed amount, alongside program exclusion.

For liability to be established, the law stipulates that the provider submitting claims for health care items or services rendered by an excluded individual must either have actual knowledge or should have known about the exclusion status of the person involved. This requirement is outlined in section 1128A(a)(6) of the Act; 42 CFR 1003.102(a)(2). Providers and contracting entities are required to proactively verify the exclusion status of individuals or entities before engaging in employment or contractual arrangements. Failure to do so can result in CMP liability.

OSHA: What are the ANSI standards and its significance to OSHA requirements?

The American National Standards Institute (ANSI) is a non-profit organization that identifies and develops standards for products, technology, and services with collaboration from government and industry stakeholders. It represents the interests of more than 270,000 companies and organizations and 30 million professionals worldwide.

OSHA has adopted a number of ANSI and other industry consensus standards. Industry consensus standards can be evidence of recognized hazards that may need correction. Under OSHA's General Duty Clause, employers are required to "furnish to each of [its] employees' employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to [its] employees."

When new standards are available, OSHA may not adopt them instantly. For example, the latest ANSI standard for eyewash can be found at <https://blog.ansi.org/2018/07/emergency-eyewash-station-shower-ansi-z358-1/#gref> . Employers will not be cited for complying with the current ANSI standard as long as the new one is equally protective. At a minimum, employers should comply with the standards that OSHA has adopted.

OSHA and Electrical Violations

Ignoring or not following safety rules can create serious issues concerning patient and employee safety, in addition to the potential for expensive penalties and legal issues. OSHA focuses on electrical safety during inspections for two important reasons:

1. Electrical shock injuries can be lethal. OSHA reports an average of one workplace electrocution fatality per day.
2. Electricity is one of the most common causes of fire in homes and workplaces. Electrical fires burn fast and can spread quickly along a wire path. A report from the U.S. Fire Administration found electrical malfunctions were the leading cause of uncontained fires in healthcare facilities between 2012 and 2014, accounting for 22% of all uncontained fires.

According to OSHA, electrical accidents appear to be caused by a combination of the following three factors:

1. Unsafe equipment and/or installation,
2. Workplaces made unsafe by the environment, and
3. Unsafe work practices.

<u>Hazards</u>	<u>Protective Measures</u>
<ul style="list-style-type: none">• Inadequate wiring• Exposed electrical parts• Wires with bad insulation• Ungrounded electrical systems and tools• Overloaded circuits• Damaged power tools and equipment• Using the wrong PPE and tools• Overhead powerlines• All hazards are made worse in wet conditions	<ul style="list-style-type: none">• Proper grounding• Using GFCI's• Using fuses and circuit breakers• Guarding live parts• Proper use of flexible cords• Training

OSHA Office of Training and Education 27

There are various ways of protecting people from the hazards caused by electricity. These include insulation, guarding, grounding, electrical protective devices, and safe work practices.

When OSHA is inspecting your practice, they will look for electrical violations and hazards. There are four types to keep in mind: water hazards, exposed wires, accident hazards, and emergency response problems.

Water Hazards

Any outlet close enough to water to be splashed must be protected by a Ground Fault Circuit Interrupter (GFCI). GFCIs will shut off the electric circuit if it detects a problem. A GFCI must be used on outlets that can potentially get wet from a water source. This includes all outlets in or near the following:

- Bathrooms
- Outdoor spaces, including the roof
- Sinks
- Eyewash stations
- Fountains
- Dental water lines

If you are running an extension cord by a water source, the outlet it is plugged into or the cord itself must have a GFCI. GFCI extension cords can be purchased at any home improvement store.

Exposed Wires

OSHA will assume that any exposed wire will be a hazard. They will look for and notice the following: broken or missing faceplates, holes in walls or ceilings, frayed cords, and breaker boxes with open areas. All circuits in breaker boxes should be labeled to prevent accidents. All unused circuits should be covered. All unused breaker switches should be labeled as such to prevent confusion.

Accident Hazards

Electrical wiring can create other hazards with misuse. Overloaded outlets, power strips and extension cords can easily cause fires. Wires and extension cords that run through traffic areas, even under carpet, will create trip hazards. Dangling cords, especially above water sources, could fall into water and cause electrical shock.

Household appliances like space heaters, fans, microwaves, and heating pads can be used in the office; but to ensure they are as safe as possible they must have a tag from a national testing laboratory. The device must also be in good working order with no loose or frayed cords. Fans should not be used in an area that could disperse aerosols containing germs, blood/bloody secretions, or other body fluids.

Emergency Response Problems

The time to find out about response problems is not when you are having an emergency! OSHA will check and verify avenues that you may not think about. Take time now to ensure you're in compliance with the following rules:

1. Practice must have immediate and on-site access to a breaker box to shut down power. Power should be cut off immediately, if possible, in case of an electrical fire, as the fire will follow the wiring quickly and cannot be stopped by water.
2. Exit lights and any other existing safety systems, like sprinklers, must be tested monthly and any problems promptly repaired.

Prioritizing electrical safety is not only a legal mandate but also an important component of ensuring patient care within healthcare facilities. By adhering to the OSHA guidelines, you can effectively mitigate the potential risks associated with electrical incidents. Recognizing the severity of electrical hazards is imperative, as emphasized by 12% of worker fatalities result from such incidents. Taking proactive measures and instilling a culture of vigilance regarding electrical safety is paramount in safeguarding both healthcare professionals and patients alike.

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Instructions

Print and post newsletter in office for staff review. Each member should sign this form when completed. Keep on file as proof of training on these topics.

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