THE ADVISOR
MONTHLY COMPLIANCE COMMUNICATOR

How Effective Infection Control Programs Protect Patients and Providers Alike

Infection prevention and control is the field dedicated to preventing healthcare-associated infections. The World Health Organization defines infection prevention and control as a "practical, evidence - based approach to prevent patients and healthcare workers from becoming infected by avoidable infections." Similarly, the Centers for Disease Control defines it as the measures taken to "prevent or stop the spread of infections in healthcare settings."

Infection control refers to a comprehensive set of policies and procedures that are implemented to minimize the spread of infections in healthcare settings. In the healthcare setting, the main objective of infection control is to prevent pathogens from being passed from one person to another, keeping both patients and healthcare providers safe. The addition of stringent protocols allows healthcare facilities to provide high-level standards of care that increase patient safety and a more secure, healthier workplace.

Healthcare settings implement universal, standard, and transmission-based precautions to prevent the spread of infection. Universal precautions are procedures to protect against blood-borne disease transmission. These assume that all blood, and any body fluids that might be contaminated with blood, is infectious. Standard precautions expand the concept of universal precautions beyond exposure to blood to include body secretions, excretions, nonintact skin, and mucous membranes. Standard precautions are designed to protect the healthcare worker and patients from pathogens. Lastly, transmission-based precautions are additional measures used to prevent the spread of infections that are transmitted through airborne, droplet, or contact transmission (example, wearing an N-95 respirator to protect against tuberculosis or COVID-19).

Standard precautions are applied to all patient care, in any healthcare setting, regardless of whether the patient has a suspected or confirmed infection. The elements of standard precautions are:

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- Hand hygiene
- Personal protective equipment
- Cleaning and disinfecting environmental surfaces
- Safe injection practices and sharps safety
- Sterilization of instruments and devices
- Respiratory hygiene/cough etiquette

All healthcare facilities should implement standard precautions as part of their infection control plan.

Healthcare facilities should have a written infection control plan separate from their OSHA plan. The goal of the plan is to provide a safe working environment that reduces infection transmission among patients and occupational exposures to workers. Providing a set of clear guidelines and protocols will equip a facility with what it needs to mitigate risks and enhance safe practices. A written plan is a two-fold win; it protects the health and well-being of patients and reduces occupational exposure that employees may face.

One difference to note between OSHA standards and infection control is OSHA's role in the regulatory world is to protect the safety of all workers in every setting. It sets forth guidelines on workplace safety standards and general safety of the worker. In contrast, infection control is specifically for healthcare settings and focuses not only on the employee, but also on the patient's safety, and its sole focus is on stopping the spread of infections. Total Medical Compliance feels that this type of program is critical to our clients.

A written infection control plan should be implemented to align with the services provided in your facility. This includes policies and procedures developed from infection control guidelines, such as the CDC, OSHA, and AAMI guidelines. It is critical to designate an Infection Control Officer to oversee the infection control program. The dedicated officer will be responsible for evaluating the program, keeping it updated, ongoing training for employees, and ensuring standard precautions are adhered to.

An effective plan consists of a personnel health program. This includes training, immunizations, exposure prevention and management of an exposure incident. Training of all healthcare personnel should be done, at a minimum, annually. Training should include standard precautions, and policies and procedures of the facility. Healthcare personnel (HCP) should be encouraged to stay up to date on immunizations and training should be provided on the importance of immunizations. HCP should know the procedure if an exposure occurs and who they report the exposure to. HCP and the employer should work together in following, evaluating, and implementing a plan. This ensures a safe environment for both patients and employees.

When crafting an infection control program that is effective, many components come into play. The ones within this article are only a beginning. Each healthcare facility is unique and poses its own risks. Infection control programs must be tailored and customized to individual facilities.

If your facility finds itself in need of an infection control program, TMC is proud to announce that we are launching this program for our clients. Please reach out to client services or your consultant today to learn more about this exciting new product!

It's Your Call – July 2024

HIPAA: Do surveillance cameras breach HIPAA regulations?
Since HIPAA mandates the confidentiality of protected health information (PHI), installing video cameras can result in a violation if they are not placed correctly or used appropriately.

Infection Control: What is the difference between universal, standard, and transmission-based precautions in preventing the spread of infection?
Universal precautions are procedures to protect against blood-borne disease transmission. These assume that all blood, and any body fluids that might be contaminated with blood, is infectious.

Standard precautions expand the concept of universal precautions beyond exposure to blood to include body secretions, excretions, nonintact skin, and mucous membranes. Standard precautions are designed to protect the healthcare worker and patients from pathogens.

Transmission-based precautions are additional measures used to prevent the spread of infections that are transmitted through airborne, droplet, or contact transmission (example, wearing an N-95 respirator to protect against tuberculosis or COVID-19).

Ensuring HIPAA Compliance with Video Surveillance in Healthcare Settings

Safeguarding PHI is required under both the HIPAA Privacy Rule and Security Rule. The **Security Rule** specifically pertains to electronic PHI, which includes video surveillance footage.

How to ensure your video surveillance system meets these standards:

1. Administrative Safeguards
Administrative safeguards involve creating policies and procedures to protect electronic PHI. For video surveillance this includes:
- Implementing policies that outline the appropriate use of surveillance cameras.
- Training staff on these policies to ensure everyone understands their role in protecting PHI.
- Regularly auditing the surveillance system and camera placement to identify and address any areas of concern.

2. Technical Safeguards
Technical safeguards refer to the technology we use to protect electronic PHI. For video surveillance, this includes:
- Using encryption for all recorded footage to prevent unauthorized access.
- Implementing secure access controls to manage who can access the footage.
- Configuring cameras to black out sensitive information in the video, such as computer monitors displaying PHI. If this is not possible, cameras should be placed so as not to be able to view screens.

3. Physical Safeguards

Physical safeguards are measures that prevent unauthorized physical access to sensitive information. For video surveillance, this involves:

- Proper camera placement to ensure they are not in areas where there is a reasonable expectation of privacy, such as exam rooms and bathrooms.

- Controlling access to ensure that camera footage can only be viewed by authorized personnel in restricted areas.

- Using permissions-based role management to customize access levels for different users, ensuring that only those with a need to know can view certain footage.

Best Practices for HIPAA-Compliant Video Surveillance

- Reasonable Expectation of Privacy: Do not place cameras in private areas. Ensure cameras are only in public or semi-public areas where individuals do not expect complete privacy.

- Audit Camera Placement: Regularly review camera placements to ensure they do not capture unnecessary PHI.

- Limit Access to Footage: Implement strict access controls to monitor who can view the footage and when. Utilize dedicated viewing stations in restricted areas only.

- Permissions-Based Management: Customize access based on individual roles. For instance, a receptionist may access lobby cameras but not interior cameras. Individual log ins should be used for auditing capabilities.

- Choose a Secure System: Select a video security system with strong security practices, including end-to-end encryption, audit logs, and regular third-party security audits.

- It is advised to work with a HIPAA compliant company willing to sign a Business Associate Agreement.

- Patient Information: Include information about the use of surveillance cameras in patient welcome packets. Clearly explain the purpose of the cameras and how the footage is used and protected. You may want to consider signage as well stating security cameras are in use in public areas of the facility.

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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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