

Residential Care Services

Continuum of Care Decisions for Critical Staffing Management in Long-Term Care Settings Guide

Management of staffing shortages should be done according to emergency preparedness plans. When faced with critical staffing shortages, LTC settings will activate emergency plans to adjust resources along a conventional, contingent and crisis continuum. Under emergency plans, LTC settings may modify resident care and referral policies (including when residents are referred to the emergency department) depending on the resources available within the health care system. References supporting this guidance are listed at the end of the document.

EXAMPLES OF CARE MODIFICATION:

General Care Guidelines: LTC settings should have a plan for prioritizing care if needed, with a focus on

- Providing essential supportive services including eating/drinking, personal hygiene, and safety
- Administering only essential medications and treatments
- Comfort care, including fluids and pain management

Medications: Focus on proven medical interventions and therapies that offer benefit; consider limiting those medications that lack clear evidence of benefit.

- Optimize medication management by requesting medical providers de-prescribe any unnecessary medications (e.g., multivitamins), simplifying medication regimens or their delivery (e.g., consolidating delivery times or changing timing for doses).
- Reduce nursing care requirements by adjusting the frequency of prescribed medical orders (e.g., routine yearly TSH orders for resident with stable hypothyroidism) or extending the interval between administration (e.g., extended release preparation of antihypertensive instead of multiple doses of short acting medication)
 - Monitor for changes if dosage intervals change.

Nutrition: Emphasize nutrition, hydration, skin and mouthcare.

- Promote nutrition modifying and liberalizing diets if necessary and offering liquid caloric supplements.
- Combine multiple tasks in one interaction—for example, monitoring of pulse oximetry, offering beverages, and repositioning the resident can all be done in one visit with proper infection control measures.

Critical Staffing Management Strategies: Emergency plans should include protocols to monitor and manage staffing resources under critical staffing conditions. Strategies should be implemented in order. For example, implement contingency strategies before crisis strategies. The table on pages 2-5 outlines regulations, care and services that could be delayed, decreased, stopped, or modified during contingency and crisis staffing conditions. LTC settings should suspend only the items that would help lessen the burden on staff or operations.

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PURPOSE AND USE OF THIS DOCUMENT: The primary goal of implementing critical staffing management according to emergency plans is to avoid the need for urgent or emergent transfer of resident/clients from their homes due to the staffing crisis. Communication with residents/clients, families, hospitals, community partners and the department are an essential component of emergency management. Emergency plans must be consistent with all applicable regulatory requirements. COVID-19 Federal Waiver Approvals can be accessed [here](#). Modification of care for critical staffing management does not exempt the setting from meeting resident basic care needs or prevention and reporting of abuse/neglect. This document is a tool to help LTC settings consider options when faced with critical staffing crises. It is not mandated or required by RCS.

Regulations/Care services that could be delayed/decreased/stopped or modified	Contingency Demand for healthcare resources begins to exceed supply but adaptations are possible to still deliver functionally equivalent care	Crisis Resources are exceeded by demand or depleted; functionally equivalent care is no longer possible to address all requirements and there is a risk to patient/resident or provider
Showers	<input type="checkbox"/> Decrease (resident/client preference)	<input type="checkbox"/> Primarily bed baths/wash ups-showers as able
Nailcare	<input type="checkbox"/> Reduce	<input type="checkbox"/> Stop with exception of Diabetic nail care
Restorative programs (including toileting programs)	<input type="checkbox"/> Reduce	<input type="checkbox"/> Stop with exception of independent programs
Outings-facility arranged/organized	<input type="checkbox"/> Medically Necessary only	<input type="checkbox"/> Request family to assist with medically necessary appointments
Activities	<input type="checkbox"/> Reduce frequency	<input type="checkbox"/> Stop-focus on res care needs
Visitations	<input type="checkbox"/> Reduce times allowed	<input type="checkbox"/> Reduce times allowed
Resident council meetings	<input type="checkbox"/> Reduce frequency	<input type="checkbox"/> Stop-address grievances individually
Dining (including mealtimes)	<input type="checkbox"/> Modify mealtimes, allow variation, limit choices	<input type="checkbox"/> Focus on 3 meals/day & snacks; alternates may not be available for lunch/dinner meals
Menus	<input type="checkbox"/> Allow variation	<input type="checkbox"/> Stop requirement of following menu. Limit or stop alternate meal choices for lunch/dinner meals. Okay to repeat meal options without 3-week timespan

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Nutrition (weight loss)	<input type="checkbox"/> Allow for simplified menu/meal choices	<input type="checkbox"/> Reduce Registered Dietician visits to highest risk only
Homelike environment	<input type="checkbox"/> None	<input type="checkbox"/> Allow for dining variation-allow use of disposable dishes
Medications (non-essential meds i.e., Vitamins, supplements)	<input type="checkbox"/> None	<input type="checkbox"/> Stop all non-essential medications & treatments with approval from Primary Care Provider
Laundry Services	<input type="checkbox"/> Reduce hours of operation Reduce personal linen and personal laundry times	<input type="checkbox"/> Reduce frequency of complete linen change to PRN, reduce personal laundry washing (OK to wear clothing not visibly soiled or smelly)
Housekeeping Services	<input type="checkbox"/> Reduce hours of operation - Only complete when needed - Implement sanitation of high touch areas.	<input type="checkbox"/> Stop requirement to clean after each meal-focus on disinfecting tables, PRN mop floors, emptying garbage, routine room cleaning vacuuming, dusting, carpet cleaning. Stop washing windows, walls, dusting high reach areas
Care conferences	<input type="checkbox"/> Reduce to those with sig changes	<input type="checkbox"/> Stop. Contact family with changes
Minimum Data Sets (Quarterly, Annual, Significant Changes)	<input type="checkbox"/> None	<input type="checkbox"/> Reduce to annual and sig changes only
Quality Assurance	<input type="checkbox"/> Reduce focus to critical issues	<input type="checkbox"/> Stop QAPI meetings
Pharmacy Review	<input type="checkbox"/> Reduce to significant meds only	<input type="checkbox"/> Stop-with exception of severe/dangerous issues requiring immediate action

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Regulations/Care services that could be delayed/decreased/stopped or modified	<h3 style="text-align: center;">Contingency</h3> <p style="text-align: center;">Demand for healthcare resources begins to exceed supply but adaptations are possible to still deliver functionally equivalent care</p>	<h3 style="text-align: center;">Crisis</h3> <p style="text-align: center;">Resources are exceeded by demand or depleted; functionally equivalent care is no longer possible to address all requirements and there is a risk to patient/resident or provider</p>
Psychotropic medication reviews	<input type="checkbox"/> Reduce frequency	<input type="checkbox"/> Stop dose reduction requirement / AIMS testing
Regulations of Participation training (i.e., trauma informed care)	<input type="checkbox"/> None	<input type="checkbox"/> Stop until staffing improves
Food Handler Card	<input type="checkbox"/> None	<input type="checkbox"/> Stop requirement-focus on handwashing
Caregiver training/certification/annual in-services	<input type="checkbox"/> Reduce frequency	<input type="checkbox"/> Focus on competency and abandon continuing education requirement. Maintain waivers for all formal training and certifications
Quarantine Requirements	<input type="checkbox"/> Allow asymptomatic Healthcare Professionals (HCP) who had a higher risk exposure to SARS CoV 2 but are not known to be infected, to shorten their duration of work restrictions. <ul style="list-style-type: none"> ○ Asymptomatic and has recovered from SARS CoV 2 in the prior 3 months ○ Asymptomatic and is fully vaccinated <input type="checkbox"/> Shortening quarantine per CDC's two acceptable alternatives: 7 or 10 days if a diagnostic specimen test negative and if no symptoms were reported during daily monitoring	<input type="checkbox"/> As a last resort consider allowing HCP with suspected or confirmed SARS-CoV-2 infection who are asymptomatic and willing to work but have not met all Return to Work Criteria to work
New Admissions	<input type="checkbox"/> Limit new admissions	<input type="checkbox"/> Prohibit admissions

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30 Day Notice of Changes to Services	<input type="checkbox"/> Maximize staff by transferring residents to units and wings.	<input type="checkbox"/> Close wings/units/hallways and condense residents to localized areas of the facility/home to maximize staff's ability to provide care
Transportation (0165)	<input type="checkbox"/> Reduce to work or school only	<input type="checkbox"/> Stop with exception of Medically Necessary appointments
Documentation – IISP (0210, 0215, 0230)	<input type="checkbox"/> Reduce to review and revise only as assessed needs change	<input type="checkbox"/> Stop until 6 months after end of crisis conditions
Documentation – IISP Accessibility (0225)	<input type="checkbox"/> Only when revised (see above)	<input type="checkbox"/> Stop until first IISP revision after crisis
Documentation – Client records & Client property records (0385 & 0390)	<input type="checkbox"/> Stop until 6 months after end of crisis	<input type="checkbox"/> Stop until one year after end of crisis conditions
Documentation – Client refusal of services	<input type="checkbox"/> None	<input type="checkbox"/> Stop with exception of prescribed medications (medication name, dosage, and date/time only)
Documentation – Disposal of medications (0345)	<input type="checkbox"/> None	<input type="checkbox"/> Stop with exception of controlled substances
Client Services (0145)	<input type="checkbox"/> Stop all except employment, health & safety, and exceptional medical/behavioral support needs in IISP	<input type="checkbox"/> Stop with exception of health & safety, exceptional medical & behavioral support needs in IISP
IISP – Implementation (0220)	<input type="checkbox"/> None	<input type="checkbox"/> Reduce to only basic health and safety need

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References

CDC - [Preparedness Checklist for Nursing Homes and Other LTC Settings](#)

CDC - [Strategies to Mitigate Healthcare Personnel Staffing Shortages](#)

CDC - [Interim Guidance for Managing Healthcare Personnel with SARS-CoV-2 Infection or Exposure to SARS-CoV-2](#)

CMS – Nursing Homes [Long Term Care Requirements CMS Emergency Preparedness Final Rule Updates Effective March 26, 2021](#)

DOH - [Interim Recommendations to Mitigate Health Care Worker Staffing Shortage During the COVID-19 Pandemic](#)

DOH - [Interim Guidance for Managing Healthcare Personnel with SARS-CoV-2 Infection or Exposure to SARS-CoV-2](#)

Control, C. f. (2021, October). Coronavirus Disease 2019 (COVID-19) Preparedness Checklist for Nursing Homes and other LTC Settings. Retrieved from CDC COVID-19: https://www.cdc.gov/coronavirus/2019-ncov/downloads/novel-coronavirus-2019-Nursing-Homes-Preparedness-Checklist_3_13.pdf

Federal Emergency Management Agency (FEMA) 2020 COVID-19: Considerations, Strategies, and Resources for Crisis Standards of Care in PALTC LTC settings <https://files.asprtracie.hhs.gov/documents/covid-19-considerations-strategies-and-resources-for-crisis-standards-of-care-in-paltc-LTC-settings.pdf>

Institute of Medicine 2013. Crisis Standards of Care: A Toolkit for Indicators and Triggers. Washington, DC: The National Academies Press. <https://doi.org/10.17226/18338>

National Academies of Sciences, E. a. (2020, March 28). Rapid Expert Consultation on Crisis Standards of Care for. Retrieved from National Academies of Sciences, Engineering, and Medicine : <https://files.asprtracie.hhs.gov/documents/nap-rapid-expert-consultation-on-csc-for-covid-19-pandemic.pdf>

National Center for Biotechnology Information, U. N. (2012). Crisis Standards of Care: A Systems Framework for Catastrophic Disaster Response. Retrieved from Chapter 8 - Out-of-Hospital and Alternate Care Systems: <https://www.ncbi.nlm.nih.gov/books/NBK201069/>