

SKILLED NURSING REOPENING TO VISITORS: KEY QUESTIONS FOR REVISING YOUR VISITOR POLICIES AND PROCEDURES FROM CMS

Skilled nursing facilities (“SNFs”) are facing many challenges as they reopen their communities to visitors. State health departments are issuing guidance on outdoor SNF visits and phased reopening of businesses. On June 24, 2020, CMS released visitor guidance in the form of several pages of [FAQs](#) “Frequently Asked Questions (FAQs) on Nursing Home Visitation” that enhance guidance offered in the prior CMS [guidance](#) and a CMS [memo](#) on “Nursing Home Reopening Recommendations for State and Local Officials.”

This article identifies several key areas of focus in those FAQs that SNFs should consider as they revise and adapt their visitor policies and procedures.

WHEN CAN SNFS REOPEN TO VISITORS?

SNFs should continue to follow CMS and the Centers for Disease Control and Prevention guidance for preventing the transmission of COVID-19, and follow state and local direction. CMS does not recommend reopening SNFs to visitors (except for compassionate care situations) until Phase 3 which CMS detailed as the following in its [memo](#) on “Nursing Home Reopening Recommendations for State and Local Officials.”:

- There have been no new, SNF onset COVID-19 cases in the SNF for 28 days (through Phases 1 and 2).
- The SNF is not experiencing staff shortages.
- The SNF has adequate supplies of personal protective equipment and essential cleaning and disinfection supplies to care for residents.
- The SNF has adequate access to testing for COVID-19.
- Referral hospital(s) have bed capacity on wards and intensive care unit.

SNF visitor policies and procedures should be updated to reflect State guidelines and these CMS guidelines.

WHAT IS A “COMPASSIONATE CARE SITUATION?”

CMS detailed that the term “compassionate care situations” does not exclusively refer to end-of-life situations. CMS offered the following examples of compassionate care situations:

- A resident who was living with their family before recently being admitted to a SNF; the change in their environment and sudden lack of family can be a traumatic experience. Allowing a visit from a family member in this situation would be consistent with the intent of the term “compassionate care situations.”
- Also allowing someone to visit a resident whose friend or family member recently passed away, would also be consistent with the intent of these situations.

SNF visitor policies and procedures should be updated to reflect the discretion of the SNF in determining compassionate care situations.

VISITOR PRECAUTIONS?

CMS directs that SNFs should still ensure all actions for preventing COVID-19 transmission are followed. Including:

- Screening all visitors for symptoms and fever;
- Asking both residents and visitors to wear a cloth face covering or face mask;
- Performing hand hygiene (e.g., use alcohol-based hand rub), maintaining social distancing at all times; and
- Ensuring the items in visitation spaces are cleaned and disinfected routinely.

If outdoor visitation is conducted, facilities should have a process to limit the number and size of visits occurring simultaneously to support safe infection prevention actions (e.g., maintaining social distancing). CMS also recommends limiting the number of individuals visiting with any one resident (e.g., two visitors for one resident visit).

SNF visitor policies and procedures should be updated to reflect these CMS guidelines.

OTHER FACTORS TO CONSIDER WHEN REOPENING TO VISITORS?

CMS encourages that any decisions to relax requirements or conduct creative alternatives within SNFs be made in coordination with state and local officials after a careful review of facility-level, community and state factors/orders. Additionally, SNFs should consider the following as a part of a comprehensive reopening plan:

- Case status in the surrounding community;
- Case status in the SNF;
- Staffing levels;
- Access to adequate testing for residents and staff;
- Personal protective equipment supplies; and
- Local hospital capacity.

These factors should help guide reopening decisions, and decisions related to creative ways to facilitate visitation. CMS offered the following example: a SNF with multiple COVID-19 cases should still use caution when deciding to facilitate outdoor visitation.

ACTION ITEMS AND POLICY REVIEW HELP AVAILABLE

SNFs should:

- Review and revise their visitor policies and procedures;
- Track local and state guidelines as they reopen to visitors; and
- Implement and communicate these policies and procedures to residents, staff, vendors and families.

If you have questions about this topic or would like assistance with revising your SNF policies and procedures, please contact:

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More information about Hall Render's Post-Acute and Long-Term Care services can be found [here](#).

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