



Iowa Health Care Association  
Iowa Center for Assisted Living  
Iowa Center for Home Care

## Clarification of AHCA Essential Visitor Recommendations – 3/11/20

On March 11, 2020 the Iowa Health Care Association (IHCA) met with representatives from the Department of Inspections and Appeals (DIA) and Iowa Department of Public Health (IDPH) to discuss the AHCA/NCAL Guidance released to our members on March 10, 2020. Based upon reports we are receiving from DIA, IDPH and members, IHCA wants to offer the following clarifications:

1. The AHCA NCAL Guidance on visitation at the time of issue does slightly exceed the CDC, IDPH and CMS guidance ([QSO-20-14-NH Revised](#)). **Please read the AHCA/NCAL Guidance carefully. It does not call for a complete ban on all visitors.** IHCA is receiving reports that some providers have initiated a total lock down. This is contrary to the guidance and may be a regulatory issue of concern to DIA.

Specifically, we advise:

- a. There is no need to restrict contractors such as physicians or other medical providers, hospice staff, therapists, dietitians, consultant pharmacists or nurse consultants from entering your buildings unless your screening process triggers cause for concern.
- b. Temporary agency staff, nursing and CNA clinical students should be screened just as you would any other visitors.
- c. Please consider family members who have residents on hospice care even if they are not at end of life. Approach is key when communicating with these family members who are facing loss of a loved one at some future date and don't want to miss visiting time. Work hard to see what accommodations can be made. It appears that many of the family complaints that are being received may have been a reaction to how facilities announced and communicated new visitor restriction policies. Please communicate, communicate, communicate with families about the need for the restriction before they file complaints with the Long-Term Care Ombudsman (LTCO) or DIA.
- d. We recommend restricting access to your facility to one entrance to increase the efficiency of your screening efforts. It is advisable to have all visitors to the building log in with the date and time. If a COVID-19 case is identified in the community or in your facility, this will make exposure tracking much easier.
- e. Notwithstanding the exceptions listed in the AHCA/NCAL Guidance, IHCA Vice President of Regulatory & Legal Affairs Krissa Mason warns that inconsistent enforcement of the visitation policy implemented in your facility may well lead to complaints, issues with the LTCO, DIA citations and potential legal action from family members. Be clear in your written policies and then follow them.

2. If your facility is located within one of the following counties, and you haven't started restricting visitors to those essential to organization operations or to certain resident care needs such as hospice, etc. you should start immediately as detailed in [QSO-20-14-NH Revised](#). The counties include:

Johnson	Cedar	Pottawattamie	Montgomery
Iowa	Muscatine	Harrison	Mills
Benton	Louisa	Shelby	
Linn	Washington	Cass	

3. Handling visitors who refuse to abide by facility visitor restrictions
- Communicate why restrictions are in place in a calm manner, emphasizing that the restrictions are in place to protect all residents in the facility.
  - Make sure to assess extenuating circumstances, such as resident on hospice services, not yet at end of life.
  - Offer alternative methods of communication available for their loved one.
  - Talk with the resident they want to see and explain the request.
  - Use best judgement and assess any extenuating circumstances of the request.
  - Do not use physical restraint to prevent individuals from entering your facility. If they insist, then you may require them to follow all your pre-entrance screening, hand hygiene and Personal Protective Equipment (PPE) protocols.
4. Additional guidance provided by DIA
- Even if you are not restricting visitors to your organization, you should be screening all visitors, contract staff and delivery personnel each time they enter the facility. All employees should be screened immediately at the beginning of every shift.** AHCA has provided a [screening tool](#) for your use. Please refer to the information above regarding screening protocols we recommend.
  - Make sure that you are arranging for alternative methods of family visitation if it cannot occur in person. Cell phones, tablets, and other electronic devices can be utilized to communicate. Ensure that family members understand the alternatives for electronic communication that you have available and the frequency. Create procedures for frequent staff updates to families and how those updates will be communicated. Each facility should have at least one designee other than the Administrator who can answer family communication questions and help families understand available communication methods.