

July 17, 2020

Coronavirus Commission for Safety and Quality in Nursing Homes  
MITRE Partnership Network

**Re: Request for input into the Coronavirus Commission for Safety and Quality in Nursing Homes**

Dear Members of the Coronavirus Commission for Safety and Quality in Nursing Homes:

On behalf of the American Geriatrics Society (AGS), we are writing in response to the request for input into the work of the Coronavirus Commission for Safety and Quality in Nursing Homes. The AGS is a nationwide, not-for-profit society of geriatrics healthcare professionals. Our members are pioneers in advanced-illness care for older individuals, focused on championing interprofessional teams, eliciting personal care goals, and treating older people as whole persons. Our members have deep expertise in long-term care and nursing home quality.

We very much appreciate that the Centers for Medicare and Medicaid Services has established this commission to protect the health and safety of older Americans, especially those in long-term care facilities. In addition to this letter, we have submitted five peer-reviewed articles (also listed these below our signatures). Our recommendations for high priority areas the commission should address are:

**Workforce**

- Increases in staffing ratios.
- Increased wages and paid family/medical leave to support the essential direct care workforce providing care to frail older adults.
- Including nursing homes in emergency personnel distribution deployment considerations.

**Infection Control**

- Enhanced training for all nursing home (NH) staff on infection control.
- Ensuring that nursing homes and other congregate care settings are included in assessments for personal protective equipment (PPE) maintained in the federal stockpile.
- Ensuring that all NHs, especially those in areas with a high prevalence of virus-positive people, have access to and support for highly sensitive viral tests that are feasible to administer on at least a weekly basis with results delivered within 24 hours.

**Family Caregivers, Caregivers, Surrogates**

- Ensuring that nursing homes institute visitation protocols that allow families and surrogates to safely visit and engage with older loved ones, while also supporting employees to learn about and adequately facilitate video/phone visits.

**Advance Care Planning & Palliative Care**

- Encourage significant federal investments in professional/public education to increase the number of older Americans who have discussed what matters to them through advance care planning and completed advance directives.
- Provide guidance that advises the federal government of the need to proactively monitoring the available supply of medications (including opioids) and equipment commonly used in symptom

management and at the end of life, particularly for people who develop the distressful and uncomfortable symptoms of respiratory failure.

### Safe Transfers Between Settings

- Hospital to NH: Individuals who test positive for COVID-19 should not be discharged to a facility unless it can safely and effectively isolate the patient from other residents and has adequate infection control protocols and PPE for staff and residents. This includes the ability to isolate or cohort residents separately from the rest of the community and provide sufficient and reliable levels of dedicated staff for people with COVID-19. Such transfers should be in accordance with CDC guidance.
- NH to Hospital: Develop guidance regarding transfers to an emergency department for presumed or confirmed COVID-19-positive residents. Factors to consider are whether a transfer is consistent with the resident's goals of care or advance directive; what the resident's medical needs are, as determined by the NH clinical staff and attending physician; and whether the NH will be able to provide the resident's medical care in place.

### Public Health

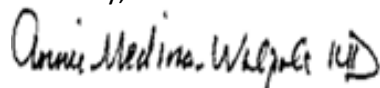
- Increased investments in the federal and state public health workforce needed to protect public health.
- Develop appropriate resource allocation strategies that do not categorically exclude older adults or persons with disabilities from the standard of care.
- Provide grants to states supporting collaboration across congregate living settings, hospitals, and health systems to care for and house people infected with COVID-19 or other infectious diseases. Planning should include geriatrics, palliative care, and long-term care experts.
- Facilitate collecting and publishing data on COVID-19 and other infectious disease cases and deaths in NHs, intermediate care facilities, and psychiatric hospitals via a streamlined, centralized process. Ideally, these analyses should look critically at how specific groups have been impacted by pandemics, including related to age, race, or other characteristics beyond someone's control.

### Payment

- Attention should be given ensuring that payment for nursing home care of COVID-19 patients is adequate to cover the increased costs related to that care (e.g., enhancing staffing skills, the need for quarantine, and the expense of PPE).
- At the same time, guardrails need to be established so that nursing homes are not incentivized to discharge residents with the goal of freeing up beds for patients with COVID-19 given the news reports that this has happened at multiple nursing homes.

Thank you for the opportunity to submit our recommendations. We stand ready to support you and provide guidance. For additional information or if you have questions, please contact Anna Kim by emailing [akim@americangeriatrics.org](mailto:akim@americangeriatrics.org).

Sincerely,



Annette Medina-Walpole, MD, AGSF  
President



Nancy E. Lundebjerg, MPA  
Chief Executive Officer

### **Additional Resources Submitted by the American Geriatrics Society**

- American Geriatrics Society Policy Brief: COVID-19 and Nursing Homes  
<https://onlinelibrary.wiley.com/doi/10.1111/jgs.16477>
- Coronavirus Disease19 in Geriatrics and Long-Term Care: An Update  
<https://onlinelibrary.wiley.com/doi/abs/10.1111/jgs.16464>
- Coronavirus Disease 2019 in Geriatrics and Long-Term Care: the ABCDs of COVID-19  
<https://onlinelibrary.wiley.com/doi/10.1111/jgs.16445>
- Rationing Limited Health Care Resources in the COVID-19 Era and Beyond: Ethical Considerations Regarding Older Adults  
<https://onlinelibrary.wiley.com/doi/10.1111/jgs.16539>
- AGS Position Statement: Resource Allocation Strategies and Age-Related Considerations in the COVID-19 Era and Beyond  
<https://onlinelibrary.wiley.com/doi/10.1111/jgs.16537>
- Social Isolation – the Other COVID-19 Threat in Nursing Homes  
<https://jamanetwork.com/journals/jama/fullarticle/2768640>