

July 28, 2020

Dining through the Phases: CMS, CDC, COVID-19

CMS Memo May 18, 2020 - [Access](#)

The reopening phases below cross-walk to the phases of the plan for [Opening Up America Again](#), and includes efforts to maintain rigorous infection prevention and control, as well as resident social engagements and quality of life. Note: The Opening Up America Guidance for communities includes visitation guidance for “senior care facilities.” The term “senior care facilities” refers to a broader set of facilities that may be utilized by seniors, and is not specific to Medicare/Medicare certified long term care facilities (i.e., nursing homes), whereas, this guidance is specific to nursing homes.

Due to the elevated risk COVID-19 poses to nursing home residents, we recommend additional criteria for advancing through phases of reopening nursing homes than is recommended in the broader Administration’s Opening Up America Again framework. For example:

- Nursing homes should not advance through any phases of reopening or relax any restrictions until all residents and staff have received a base-line test, and the appropriate actions are taken based on the results;
- States should survey those nursing homes that experienced a significant COVID-19 outbreak prior to reopening to ensure the facility is adequately preventing transmission of COVID-19; and
- Nursing homes should remain in the current state of highest mitigation while the community is in Phase 1 of Opening Up America Again (in other words, a nursing home’s reopening should lag behind the general community’s reopening by 14 days).

Phase I Directives

Status	Criteria for Implementation	Visitation and Service Considerations	Surveys that will be performed at each phase
Current state: Significant Mitigation and Phase 1 of Opening Up America Again	<ul style="list-style-type: none"> • Most facilities are in a posture that can be described as their highest level of vigilance, regardless of transmission within their communities. 	<ul style="list-style-type: none"> • Visitation generally prohibited, except for compassionate care situations. In those limited situations, visitors are screened and additional precautions are taken, including social distancing, and hand hygiene (e.g., use alcohol-based hand rub upon entry). All visitors must wear a cloth face covering or facemask for the duration of their visit. • Restricted entry of non-essential healthcare personnel. • Communal dining limited (for COVID-19 negative or asymptomatic residents only), but residents may eat in the same room with social distancing (limited number of people at tables and spaced by at least 6 feet). • Non-medically necessary trips outside the building should be avoided. 	<ul style="list-style-type: none"> • Investigation of complaints alleging either Immediate Jeopardy or actual harm to residents • Revisit surveys to confirm the facility has removed any Immediate Jeopardy findings • Focused infection control surveys • Initial certification surveys • State-based priorities (e.g., localized “hot spots,” “strike” teams, etc.) • See Appendix for recommendations for prioritizing facilities to be surveyed

Phase II Directives

Status	Criteria for Implementation	Visitation and Service Considerations	Surveys that will be
Phase 2 of Reopening nursing homes and Opening Up America Again	<ul style="list-style-type: none"> Case status in community has met the criteria for entry into phase 2 (no rebound in cases after 14 days in phase 1). There have been no new, nursing home onset COVID cases in the nursing home for 14 days. The nursing home is not experiencing staff shortages. The nursing home has adequate supplies of personal protective equipment and essential cleaning and disinfection supplies to care for residents. The nursing home has adequate access to testing for COVID-19. Referral hospital(s) have bed capacity on wards and intensive care units. 	<ul style="list-style-type: none"> Visitation generally prohibited, except for compassionate care situations. In those limited situations, visitors are screened and additional precautions are taken, including social distancing, and hand hygiene (e.g., use alcohol-based hand rub upon entry). All visitors must wear a cloth face covering or facemask for the duration of their visit. Allow entry of limited numbers of non-essential healthcare personnel/contractors as determined necessary by the facility, with screening and additional precautions including social distancing, hand hygiene, and cloth face covering or facemask. Communal dining limited (for COVID-19 negative or asymptomatic residents only), but residents may eat in the same room with social distancing (limited number of people at tables and spaced by at least 6 feet). Group activities, including outings, limited (for asymptomatic or COVID-19 negative residents only) with no more than 10 people and social distancing among residents, appropriate hand hygiene, and use of a cloth face covering or facemask. 	<ul style="list-style-type: none"> Investigation of complaints alleging either Immediate Jeopardy or actual harm to residents Revisit surveys to confirm the facility has removed any Immediate Jeopardy findings Focused infection control surveys Initial certification surveys State-based priorities (e.g., localized "hot spots," "strike" teams, etc.) See Appendix for recommendations for prioritizing facilities to be surveyed

Phase III Directives

Status	Criteria for Implementation	Visitation and Service Considerations	Surveys that will be performed at each phase
Phase 3 of Reopening nursing homes and Opening Up America Again	<ul style="list-style-type: none"> Community case status meets criteria for entry to phase 3 (no rebound in cases during phase 2). There have been no new, nursing home onset COVID cases in the nursing home for 28 days (through phases 1 and 2). The nursing home is not experiencing staff shortages. The nursing home has adequate supplies of personal protective equipment and essential cleaning and disinfection supplies to care for residents. The nursing home has adequate access to testing for COVID-19. 	<ul style="list-style-type: none"> Visitation allowed with screening and additional precautions including ensuring social distancing and hand hygiene (e.g., use alcohol-based hand rub upon entry). All visitors must wear a cloth face covering or facemask for the duration of their visit. Allow entry of non-essential healthcare personnel/contractors as determined necessary by the facility, with screening and additional precautions including social distancing, hand hygiene, and cloth face covering or facemask. Communal dining limited (for COVID-19 negative or asymptomatic residents only), but residents may eat in the same room with social distancing (limited number of people at tables and spaced by at least 6 feet). Group activities, including outings, allowed (for asymptomatic or COVID-19 negative residents only) with no more than the number of people where social distancing among residents can be maintained, appropriate hand hygiene, and use of a cloth face covering or facemask. 	<ul style="list-style-type: none"> Normal Survey operations All complaint and revisit surveys required to identify and resolve any non-compliance with health and safety requirements Standard (recertification) surveys and revisits Focused infection control surveys State-based priorities (e.g., localized "hot spots," "strike" teams, etc.) See Appendix for recommendations for prioritizing facilities to be surveyed

States with Specific Dining Guidelines from July 23, 2020

Georgia (GA)

Office of the Governor Brian P. Kemp

On June 29, 2020, Governor Kemp extended the Public Health State of Emergency via Executive Order as part of the state's ongoing response to the COVID-19 pandemic. It was set to expire on July 12, and has been extended to August 11 and, additionally, extends Executive Order 04.08.20.03 regarding long term care for a period of 43 days, also until August 11. As such, centers are being asked to continue to restrict facility visitation, group activities and communal dining. [Access](#)

Missouri (MO) Department of Health and Senior Services (MDHSS)

MDHSS developed June 15, 2020 guidance considerations for the communal dining and group activities. [Access](#)

Missouri (MO) Department of Health and Senior Services (MDHSS)

MDHSS developed June 15, 2020 guidance considerations for the communal dining and group activities. [Access](#)

North Carolina (NC)

North Carolina Department of Health and Human Services, Office of the Governor Roy Cooper On July 16, 2020, updated guidance for Visitation, Communal Dining and Indoor Activities for Larger Residential Settings (Adult Care Homes, Behavioral Health/IDD, Intermediate Care Facilities, Psychiatric Residential Treatment Facilities). [Access](#)