

## MDS Alert

### Reader Question: No RN Necessary for IP

**Question:** What nursing credentials does a facility staff member need to serve as the infection preventionist?

New Mexico Subscriber

**Answer:** In responding to comments on a proposed rule that prescribed that the infection control and prevention specialist or infection preventionist (IP) must be a clinician, the 2016 "Medicare and Medicaid Programs; Reform of Requirements for Long-Term Care Facilities" final rule addressed credentials.

"We understand that there is a substantial amount of concern and confusion about the qualifications for the IP. We also understand that many LTC facilities currently have individuals who are responsible for infection control who might not qualify under the proposed requirements, but who have been performing their duties exceptionally well. These individuals may have obtained their knowledge through training at the facility or other experience," CMS says in the 2016 final rule.

CMS made adjustments by changing the language in the rule to acknowledge that other forms of training and experience could fully prepare someone for the role of IP.

"Thus, we have modified the requirements to allow for flexibility and for individuals with a broader range of experience to be a qualified IP. Specifically, we have removed the term 'clinician' and instead provide at § 483.80(b) that the IP's primary professional training must be in nursing, medical technology, microbiology, or epidemiology, or other related field and that IPs can be qualified by education, training, experience or certification," CMS says.

Therefore, the IP at your facility does not have to be a registered nurse (RN) specifically. Additionally, a July 2019 proposed rule, "Medicare and Medicaid Programs; Requirements for Long-Term Care Facilities: Regulatory Provisions To Promote Efficiency, and Transparency" notes that the designated staff member does not need to meet any particular time requirements at a facility to serve as an IP.

"We propose to remove the requirement that the infection preventionist (IP) work at the facility 'part-time' or have frequent contact with the infection prevention and control program (IPCP) staff at the facility. We will instead require that the facility must ensure that the IP has sufficient time at the facility to meet the objectives of its IPCP," CMS says in the proposed rule.