

Long Term Care Facility Role in Pandemic: Dispensing Anti-Virals

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National Center for Assisted Living**

AHCA/NCAL

- § Long term care (LTC) profession's leading voice in Washington, DC.
- § Helping to ensure quality care for the majority of Americans who – because of social needs, disability, trauma or illness – will require long term care at some point in their lives.

AHCA/NCAL

- § Represents nearly 11,000 non-profit and proprietary facilities, including nursing facilities, assisted living residences, subacute centers, and homes for people with developmental disabilities.
- § Members include administrators, directors of nursing, owners, and caregivers from small, independent-owner facilities to regional, multi-facility chain corporations.
- § Federation with 50 State Affiliates.



Long Term Care (LTC) Facility Role in Disaster Preparedness

- § LTC facilities play an integral role in disaster preparedness.
- § LTC facilities should be a component of the larger national response.
- § LTC facilities and state and local public health agencies should partner together
 - to dispense anti-viral medication during an influenza pandemic.

Our Top Priority: Our Residents

- § Anti-viral drug prophylaxis for employees must be placed in context of our patients who are:
 - frail, elderly, disabled, medically-fragile in a congregate setting
 - Low priority for a pandemic influenza vaccine (CDC guidance)
 - Likely to remain in the LTC facility for pandemic influenza treatment
 - § Draft CDC guidance: First priority for treatment: hospital patients
 - § Draft CDC guidance: Priority group 6 -- post exposure prophylaxis (PEP) including LTC residents

Conflict

- § Vulnerable population
- § Centers for Medicare & Medicaid Services (CMS)
 - Infection control regulations may require patient prophylaxis
- § Potential solutions:
 - Move patients up on the priority list
 - Clear instruction from CDC and CMS—
during pandemic, CDC guidance takes precedence
 - § Protection from liability

Anti-Viral Drug Prophylaxis to LTC Employees

- § We would like to dispense anti-virals to employees
 - also to employees' families & volunteers
- § We will need help to overcome additional obstacles



Obstacle 1—Costs

- § Most nursing facilities rely on Medicaid reimbursement—and therefore have tight margins
- § In addition, Medicare does not cover prophylaxis
- § Potential solutions:
 - Allow LTC to purchase anti-virals for employees (and families) at government discount price
 - Revise Medicaid policy to make purchase of anti-virals a claimable cost in a pandemic
 - Revise Medicare policy to cover prophylaxis for anti-virals for patients in a pandemic
 - Government provides the medicine and LTC dispenses

Obstacle 2— Shelf life & Other “ifs”

- § 5-year shelf life
- § Potential Solution:
Include private stockpiles for high-priority populations in shelf-life extension program
- § Potential for government seizure
- § Adverse reactions to anti-virals

Obstacle 3— Need for Better Communication & Coordination

- § **Strong, effective communication between state and local public health agencies and LTC facilities**
 - Begins when LTC is part of/involvement in the state plan
 - Continues in time of emergency
 - § Clarification on eligibility for public stockpile
 - § Clarification on when distribution begins
- § **Coordination between federal agencies, i.e., CDC and CMS, HHS and DHS**
- § **Timely information to the public**

Obstacle 4—Need for More Education

- § Education to LTC providers on their potential role
 - As dispensers of anti-virals
 - As hospital surge site
- § Education on appropriate use of anti-virals, including looking for side effects
- § Policy templates and other educational materials
- § Timely, understandable information to the public

Obstacle 5— Defining Who Gets Anti-Virals

- § CDC recommends staff with direct resident contact for anti-viral drug prophylaxis**
- § In a disaster, all available LTC employees may become direct care employees**
- § Volunteers have direct resident contact too**
- § LTC employees are often single moms**
 - How do we help keep their families healthy?**

Obstacle 6—Liability

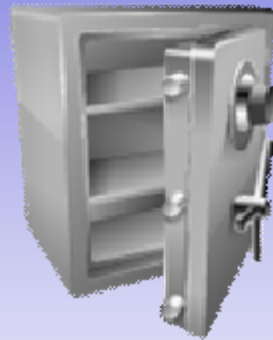
- § Adverse reaction to anti-viral
- § If LTC facility dispenses to employees and not patients
- § Potential solutions:
 - Good Samaritan Acts
 - Liability waiver template
 - Clear direction from CDC and CMS

Obstacle 7—Prescriptions

- § Prescriptions for so many could be a problem for the Medical Director
- § Potential solutions:
 - Allow general prescribing policies, e.g., standing orders, blanket prescriptions
 - Develop model screening tool

Obstacle 8—Security

§ Enhanced security likely to be needed



Conclusions

- § Important that LTC staff receive anti-virals.
- § With help to overcome obstacles, LTC facilities could be in a good position to provide anti-viral drug prophylaxis.
- § Planning and preparing is key.
- § Think “disaster.”
- § Flexibility is also key.