

# Immunizations in Long-term Care Facilities

Bureau of Survey and Certification (BOSC)  
Provider Resources and Education Program (PREP)  
Darcie Anderson, RN, MSN, Nursing Educator



# Learning Objectives

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After completing the training, the learner will be able to:

- Recognize the value of immunizations in long-term care.
- Identify and apply federal regulations and State of Ohio rules regarding immunizations.
- Differentiate resident needs for vaccinations.



# Learning Objectives (cont.)

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- Understand the value and requirements for facility immunization programs.
- Identify the BOSC survey process and facility staff role during the survey.
- Using citation findings and solution examples, identify gaps and determine opportunities for their long-term care facility to improve patient care



# Continuing Education Requirements/Learner Outcome

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To earn continuing education, the learner must:

- Register to attend.
- Attend 100% presentation.
- Receive an 80% pass rate on the knowledge check.
- Complete evaluation.
- Other participants will receive a certificate of completion.

Desired learner outcome: 100% of the learners will self-report increased knowledge regarding regulated immunizations in long-term care facilities.



# Disclosure Statement

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No one with the ability to control the content of this activity has a relevant financial relationship with an ineligible company.




# Provider Statement

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- The Ohio Department of Health is approved as a provider of nursing continuing professional development by the Pennsylvania State Nurses Association, an accredited approver by the American Nurses Credentialing Center's Commission on Accreditation.
- The Ohio Department of Health Bureau of Environmental Health and Radiation Protection is an approved provider of continuing education for Registered Environmental Health Specialists and Environmental Health Specialists in training.

# Provider Statement (cont.)

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- The Ohio Department of Health is an approved provider of continuing education for Licensed Nursing Home Administrators by the Ohio Board of Executives of Long-Term Services and Supports.
- The Ohio Department of Health, 246 N. High St., Columbus, Ohio, is an approved provider of continuing education for Social Workers by the Ohio Counselor, Social Worker, and Marriage and Family Therapist Board (RSX048808). An equal opportunity employer/provider. 

# Agenda

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- Definition, importance, and programs for immunizations.
- Immunizations for residents and regulations.
- Immunizations for staff and regulations.
- BOSC survey processes for resident and staff immunizations.



# Acronyms

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- Advisory Committee on Immunization Practices (ACIP).
- Bureau of Survey and Certification (BOSC).
- Centers for Disease Control and Prevention (CDC).
- Centers for Medicare and Medicaid Services (CMS).
- **Corona Virus Disease** of 2019 (COVID-19).
- Infection Preventionist (IP).
- National Healthcare Safety Network (NHSN).
- Ohio Department of Health (ODH).
- Pneumococcal conjugate vaccine (PCV).
- Pneumococcal polysaccharide vaccine (PPSV).



# Federal Emblem & State Logo

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[Source:](#) CMS



# Immunizations



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# Immunization

Process for resident to become protected against a disease through vaccination.

- ~ Inoculation.



[Source: North Carolina Health News](#)



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# Immunization Value

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# Immunization Importance in LTC

- Immunizations minimize risk of residents acquiring, transmitting, or experiencing complications from disease.
- Outbreaks place residents, staff, visitors, and the community at risk.



[Source: North Carolina Health](#)



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# Five Reasons to Get Vaccinated

- They save lives.
- They protect against preventable disease.
- They prevent illness.
- They are safe.
- They may be required.

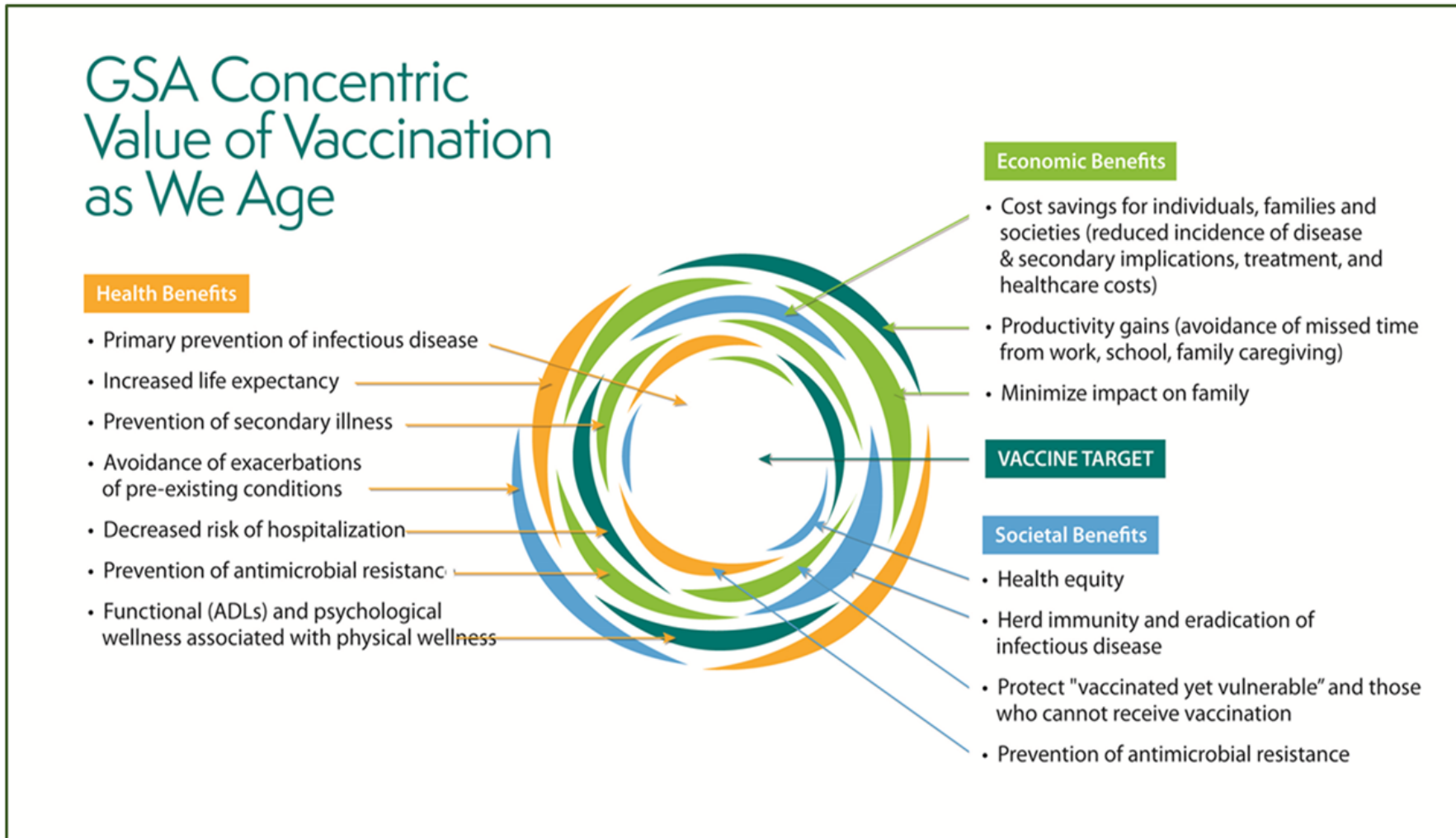


[Source: CDC](#)



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# Value of Vaccination as We Age



Source: [Gerontological Society of America](#)



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# Influenza and Pneumococcal Immunization Regulations



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# Federal Regulations and State Rules

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# Federal Regulation §483.80 (d) (1) (2)

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[Source:](#) CMS



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# Federal Regulation §483.80 (d) (1) (2) (cont.)

## **The facility must do the following for influenza immunization:**

- Develop policies and procedures.
- Provide benefits and potential side effect education.
- Offer immunization 10/01 to 03/31 annually.
- Provide the opportunity to refuse.

## **The facility must do the following for pneumococcal immunization:**

- Develop policies and procedures.
- Provide benefit and potential side effect education.
- Offer immunization based on resident vaccination history.
- Provide the opportunity to refuse.



# Federal Regulation §483.80 (d) (1) (2) (cont.)

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## **Medical record for *influenza* immunization must show the facility:**

- Provided benefits and potential side effect education.
- Received immunization.
- Did not receive immunization and rationale.

## **Medical Record for *pneumococcal* immunization must show the facility:**

- Provided benefits and potential side effect education.
- Received immunization.
- Did not receive immunization and rationale.



# Ohio Administrative Code 3701-17-13

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Vaccines against influenza and pneumococcal pneumonia must be offered annually.



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# Influenza Immunization



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# Influenza

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- Seasons are unpredictable.
- Seasonal influenza vaccines are designed against four main groups of influenza Type A and B viruses.



[Source: static flickr](#)



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# Influenza and Quality of Life for Elderly

- Older adults and those with underlying health problems have an increased risk for complications.
- A facility Influenza A outbreak can result in 60% of the population becoming ill.
- Influenza-associated mortality can result from pneumonia and other conditions like cardiovascular and cerebrovascular events and other chronic diseases.



[Source: IMG Raw Pixel](#)



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# Influenza and Planning for Care

- Mild problems from vaccine administration might occur.
- Severe problems from vaccine administration are rare.
  - Guillain-Barre Syndrome is very rare: one to two cases per million people.



Source: Microsoft PP Stock Photo



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# Influenza Immunization for Adults over 65

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# Influenza Vaccines for People 65 and Older

CDC recommends:

- Higher-dose flu vaccine.
- Adjuvanted flu vaccine.



[Source: CDC](#)



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# Influenza Vaccine Shortage

The facility must demonstrate:

- Vaccine ordered (vaccine received, shipping confirmation or not available).
- Vaccination provider contacted on a regular basis for updates and medical director notified for additional guidance.
- Administration plan developed.
- Residents screened for eligibility and desire for the vaccination.
- Education implemented for residents.



Source: Bing images



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# Pneumococcal Immunization



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# Pneumococcal and Quality of Life for Elderly

- Pneumococcus is one of the leading causes of community-acquired infections in the U.S.
- Adults over 65 have an increased risk for invasive pneumococcal disease with a higher case-fatality rate.
- Vaccines reduce the risk of invasive pneumococcal disease and pneumonia.



[Source: Aging Care](#)



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# Pneumococcal and Planning for Care

Adults at high risk of invasive pneumococcal disease include:

- Individuals aged 65 and over.
- Individuals with certain medical conditions.



[Source: CDC](#)



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# Pneumococcal Vaccinations

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# Which pneumococcal vaccine do I give?

In the United States there are two kinds of vaccines recommended to help prevent pneumococcal disease:

- Pneumococcal conjugate vaccine (PCV 15 and PCV20).
- Pneumococcal polysaccharide vaccine (PPSV23).



[Source: Qcvialz Vial Products](#)

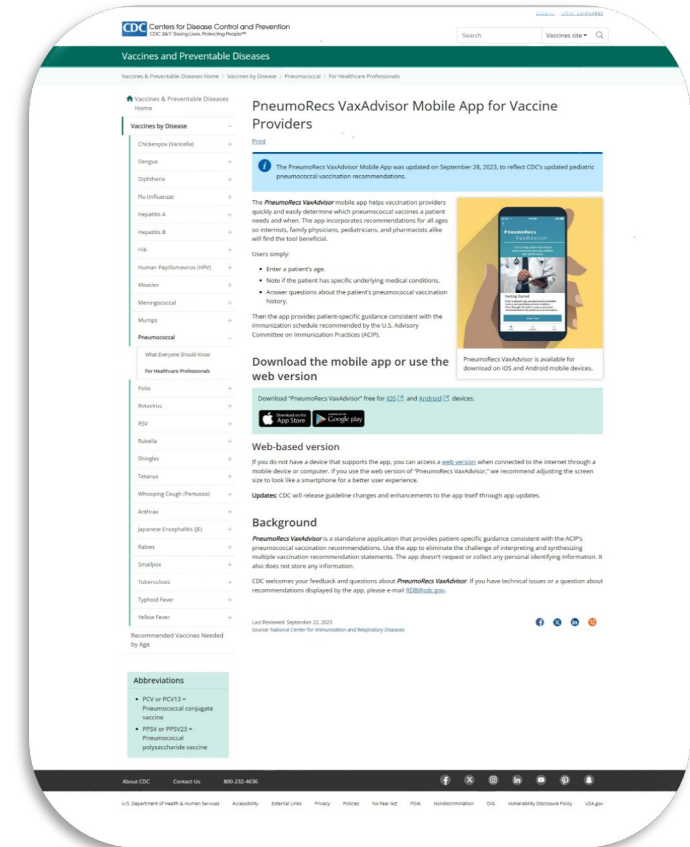


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# Pneumococcal Vaccine Guidance

The [PneumoRecs VaxAdvisor](#) mobile app helps vaccination providers quickly and easily determine pneumococcal vaccine need by entering the:

- Resident's age.
- Resident's underlying medical conditions.
- Resident's pneumococcal vaccination history.

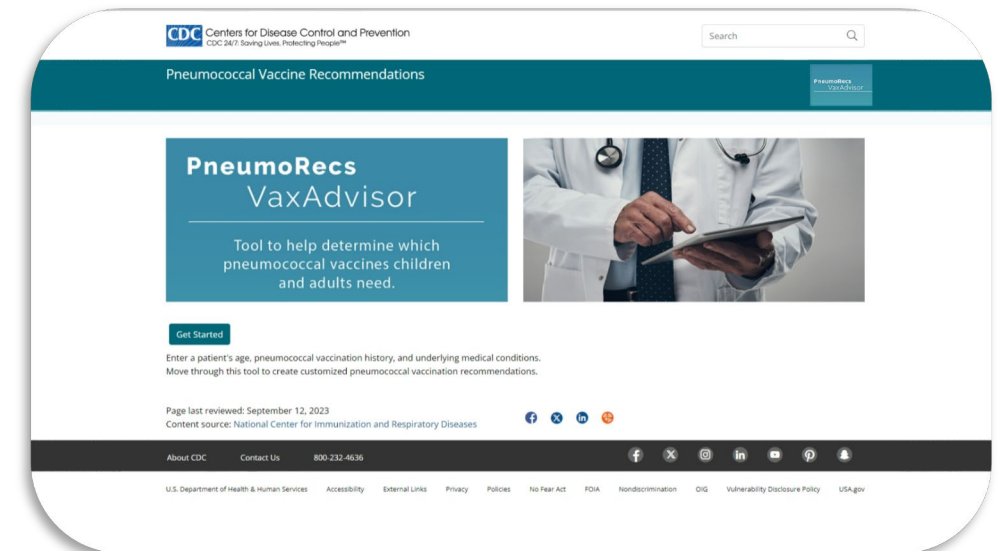


Source: CDC



# Pneumococcal Vaccine Guidance (cont.)

- [PneumoRecs VaxAdvisor mobile app.](#)
- [PneumoRecs VaxAdvisor web page.](#)



Source: CDC



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# COVID-19 Immunization Regulations for Residents



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# Federal Regulation §483.80 (d) (3)

Facility policies and procedures must ensure the facilities:

- Offer the vaccine when available.
- Educate residents on benefits, risks, and potential side effects.
- Educate residents with each dose.
- Provide the opportunity for residents to accept or refuse the vaccine and change their decision.



[Source: CMS](#)



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# Federal Regulation §483.80 (d) (3) (cont.)

Resident medical record needs to include at a minimum the resident was:

- Provided education on benefits and potential risks.
- Administered the COVID-19 vaccination.
- Did not receive the vaccination due to refusal or medical contraindication.



[Source: CMS](#)

# Ohio Administrative Code 3701-17-11

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Each nursing home shall:

- Establish and implement policies and procedures.
- Establish infection control program to monitor compliance with the infection control policies and procedures.
- Designate an appropriately licensed health professional with competency as the infection control coordinator.



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# COVID-19 and Quality of Life for Elderly

CDC reports:

- Illness risk increases with age.
- Most COVID-19 deaths occur for people 65 years and older.
- Additional factors increase COVID-19 illness risks (not getting vaccinated, underlying medical conditions).



[Source: Fleeting Life](#)



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# COVID-19 Vaccinations

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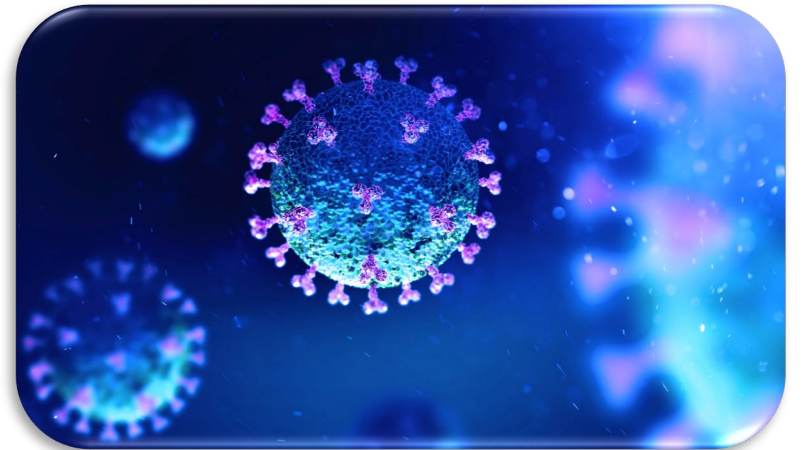
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# COVID-19 and Planning for Care

Tools to prevent residents from getting very sick from COVID-19 include:

- Vaccinations.
- Protective mask.
- Early treatment.



[Source: The Travel Doctor](#)



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# COVID-19 Immunization Regulations for Facility Staff



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# Federal Regulation §483.80 (d) (3)

Facility policies and procedures must ensure the facility:

- Offers vaccine when available.
- Educates staff on benefits, risks, and potential side effects.
- Educates staff with each dose.
- Provide the opportunity for staff to accept or refuse the vaccine and change their decision.



[Source:](#) CMS

# Federal Regulation §483.80 (d) (3) (cont.)

Facility staff documentation must prove:

- Education on benefits and risk was provided.
- COVID-19 vaccination or information on obtaining the vaccination was offered.
- Information was documented in the National Healthcare Safety Network.



[Source:](#) CMS



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# Ohio Administrative Code 3701-17-11

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Each nursing home shall:

- Establish and implement policies and procedures.
- Establish infection control program to monitor compliance with the infection control policies and procedures.
- Designate an appropriately licensed health professional with competency as the infection control coordinator.



# Facility Immunization Program



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# Immunization Program

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# Immunization Program

Facility immunization programs must include:

- Policies for influenza, pneumococcal, and COVID-19 vaccines for residents and COVID-19 vaccines for staff.
- Resident record review of vaccination status.
- A process for providing education and pertinent information to resident.
- A vaccination schedule including mechanisms for recording and monitoring for administration of influenza, pneumococcal, and COVID-19 vaccines.



[Source: Picpedia](#)



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# Facility Policy

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Facility policies and procedures should identify:

- How education is provided.
- How screening is conducted.
- How vaccinations are offered.
- How consent/refusal is obtained.



[Source: public domain pictures](#)



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# Immunization Process

- Facilities may encounter inadequate documentation for new facility admissions.
- Only accept written, dated records as evidence of vaccination for PCVs, COVID-19 and any other immunization.
- Influenza vaccination and pneumococcal polysaccharide vaccination (PPSV) may be self-reported.
- State law may be more stringent.

**IMMUNIZATION RECORD**  
POLIOVIRUS VACCINE, ORAL  
Administered at  
EDITH A. BOGERT SCHOOL  
Upper Saddle River, N. J.

NAME VINCENT RACANIELLO  
ADDRESS 2 BRIAR CLIFF ROAD

VACCINE ADMINISTRATION	TYPE I	TYPE II	TYPE III
DATE	9/8/63	4/17/64	4/15/64

[Source: Virology](#)



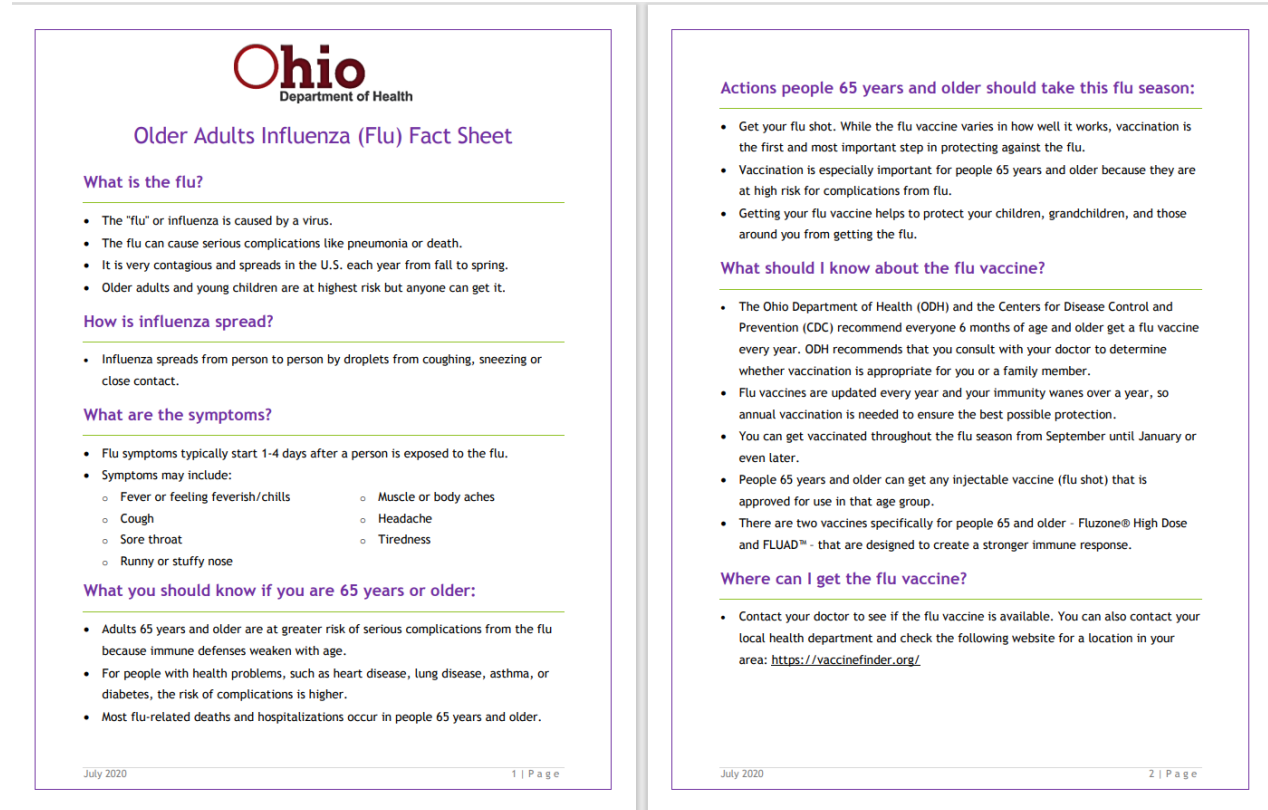
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# Educational Guidance

## Ohio Department of Health Immunization Program pamphlets:

- [Older Adults Influenza \(Flu\) Fact Sheet.](#)
- [Pneumococcal \(Pneumonia\).](#)



Source: ODH



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# Educational Guidance (cont.)

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- [Influenza Vaccine Information Sheet \(VIS\).](#)
- [Pneumococcal Polysaccharide Vaccine \(PPSV23\) VIS.](#)
- [Pneumococcal Conjugate Vaccine \(PCV\) VIS.](#)
- [COVID-19 Vaccine Information Sheet \(VIS\).](#)
- [All current Vaccine Information Sheets \(VISs\) for vaccinations.](#)



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# Safe Vaccination Administration

- Vaccine should not be administered if it is medically contraindicated.
- Vaccine should not be administered if the resident is moderately or severely ill.
- Vaccines may be administered with other vaccines.
- [Vaccine Safety Monitoring and Vaccine Safety Activities of the CDC.](#)



[Source: CDC](#)



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# Acceptable Reasons for Not Vaccinating

- Delay in vaccination because a precaution is present.
- Refusal due to end stages of a terminal illness and receiving comfort or palliative care.
- Medical contraindication.
- Refusal by resident or representative.
- Resident has already been immunized.



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# Immunization Tracking Ideas

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- [State of Ohio Impact Statewide Immunization Information System](#) (Impact SIIS) allows users to search for residents' vaccination history.
- [Resident Immunization Tracking Spreadsheet](#) allows users to track and audit influenza, pneumococcal and COVID-19 immunizations for residents.



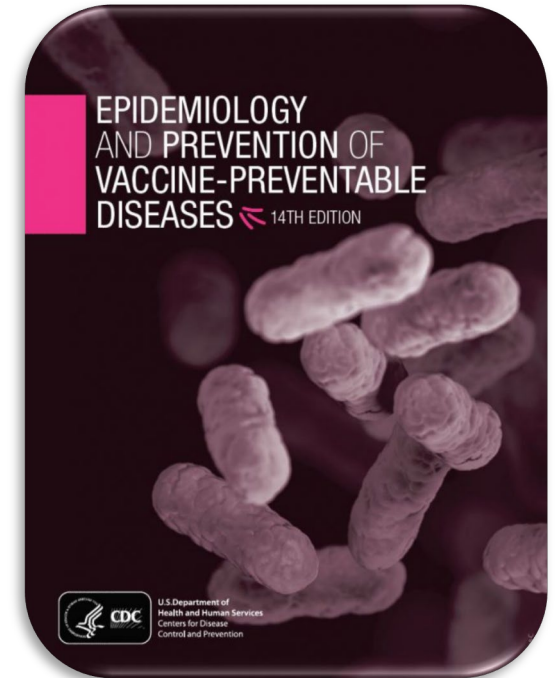
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# Current Vaccine Recommendations

CDC's "Epidemiology and Prevention of Vaccine-Preventable Diseases" provides recommendations regarding scheduling and contraindications:

- <https://www.cdc.gov/vaccines/acip/index.html>
- <https://www.cdc.gov/vaccines/pubs/pinkbook/chapters.html>



Source: [CDC](https://www.cdc.gov/vaccines/pubs/pinkbook/)



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# BOSC Survey Process for Immunizations



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# BOSC Survey Process

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# Resident Vaccinations



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# CMS Guidance & Sampling for Residents

- Guidance from the Infection Prevention, Control, and Immunizations Facility Task Pathway.
- Five residents selected for review.



[Source: Web Teacher](#)



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# CMS Survey Questions for Residents

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- Did the facility provide influenza and/or pneumococcal immunizations as required or appropriate for the resident?
- Did the facility educate and offer COVID-19 immunizations as required or appropriate for residents?



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# Record Review for Residents

Surveyor is looking for resident documentation to support:

- Screening and vaccine eligibility.
- Education on benefits, risks and potential side effects.
- Acceptance or refusal of vaccine.
- Administration of vaccine.



[Source: Request Copies of Your Medical Records](#)



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# Record Review for Residents (cont.)

If not administered, documentation to support why vaccine was not provided:

- Refusal with a signed declination form.
- Medical contraindication.
- Previous vaccination administration.



[Source: Request Copies of Your Medical Records](#)



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# Record Review for Residents (cont.)

## Review of Minimum Data Set (MDS) 3.0 assessment:

- Section O: Special Treatments, Procedures, and Programs:
  - O0250 (influenza immunization).
  - O0300 (pneumococcal immunization).
  - O0350 (COVID-19 immunization).

### O0250. Influenza Vaccine - Refer to current version of RAI manual for current influenza vaccination season and reporting period

Enter Code

☐

A. Did the resident receive the influenza vaccine **in this facility** for this year's influenza vaccination season?

0. No → Skip to O0250C, If influenza vaccine not received, state reason
1. Yes → Continue to O0250B, Date influenza vaccine received

B. Date influenza vaccine received → Complete date and skip to O0300A, Is the resident's Pneumococcal vaccination up to date?

		-			-				
Month			Day			Year			

C. If influenza vaccine not received, state reason:

1. Resident not in this facility during this year's influenza vaccination season
2. Received outside of this facility
3. Not eligible - medical contraindication
4. Offered and declined
5. Not offered
6. Inability to obtain influenza vaccine due to a declared shortage
9. None of the above

Enter Code

☐

### O0300. Pneumococcal Vaccine

Enter Code

☐

A. Is the resident's Pneumococcal vaccination up to date?

0. No → Continue to O0300B, If Pneumococcal vaccine not received, state reason
1. Yes → Skip to O0350, Resident's COVID-19 vaccination is up to date

Enter Code

☐

B. If Pneumococcal vaccine not received, state reason:

1. Not eligible - medical contraindication
2. Offered and declined
3. Not offered

### O0350. Resident's COVID-19 vaccination is up to date

Enter Code

☐

0. No, resident is not up to date
1. Yes, resident is up to date

Source: CMS and MDS



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# Review of Facility Policy

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Review of the facility policy to ensure they meet the federal requirements for influenza, pneumococcal, and COVID-19 immunizations.



[Source: Book Binders free stock photo](#)



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# Interview with Residents and Staff

Surveyors will be inquiring:

- How education is provided.
- How screening for eligibility is conducted.
- How vaccines are offered.
- How consent/refusal is obtained.



[Source: Seniors](#)



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# Interview with Minimum Data Set Nurse

The MDS nurse may be interviewed for clarification on any discrepancy regarding influenza, pneumococcal or COVID-19 vaccination coding.

## 00250. Influenza Vaccine - Refer to current version of RAI manual for current influenza vaccination season and reporting period

Enter Code

☐

A. Did the resident receive the influenza vaccine *in this facility* for this year's influenza vaccination season?

0. No → Skip to 00250C, If influenza vaccine not received, state reason
1. Yes → Continue to 00250B, Date influenza vaccine received

B. Date influenza vaccine received → Complete date and skip to 00300A, Is the resident's Pneumococcal vaccination up to date?

		-			-				
Month			Day			Year			

Enter Code

☐

C. If influenza vaccine not received, state reason:

1. Resident not in this facility during this year's influenza vaccination season
2. Received outside of this facility
3. Not eligible - medical contraindication
4. Offered and declined
5. Not offered
6. Inability to obtain influenza vaccine due to a declared shortage
9. None of the above

## 00300. Pneumococcal Vaccine

Enter Code

☐

A. Is the resident's Pneumococcal vaccination up to date?

0. No → Continue to 00300B, If Pneumococcal vaccine not received, state reason
1. Yes → Skip to 00350, Resident's COVID-19 vaccination is up to date

Enter Code

☐

B. If Pneumococcal vaccine not received, state reason:

1. Not eligible - medical contraindication
2. Offered and declined
3. Not offered

## 00350. Resident's COVID-19 vaccination is up to date

Enter Code

☐

0. No, resident is not up to date
1. Yes, resident is up to date

Source: CMS and MDS



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# Interview with Infection Preventionist

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The Infection Preventionist (IP) may be interviewed regarding concerns with resident influenza, pneumococcal or COVID-19 vaccinations.



[Source: Pic Server](#)



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# Interview with Administration

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The facility administration may be interviewed regarding concerns with resident influenza, pneumococcal or COVID-19 vaccinations.



[Source: Wikimedia](#)



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# Observation of Residents

Surveyors may be observing for:

- Education of residents regarding risks, benefits, and side effects.
- Review of the medical record by staff for medical contradictions.
- Offering of consent or declination of the vaccination.
- Administration of the correct vaccine.



[Source: Creative Commons](#)



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# Limited Vaccine Supply

For surveys occurring during influenza season, valid reasons for not implementing the vaccine program include:

- Unavailability of influenza vaccine.
- Unavailability of pneumococcal or COVID-19 vaccines.



[Source: Word Press](#)



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# Limited Vaccine Supply (cont.)

The facility must demonstrate:

- Documentation of ordering with confirmation.
- Documentation of ship date or date it will be shipped when available.
- Facility plans for administration upon availability.



[Source: University of Melbourne](#)



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# Staff Vaccinations



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# CMS Guidance & Sampling for Staff

- Guidance from the Infection Prevention, Control, and Immunizations Facility Task Pathway.
- One staff selected for review but may select more if needed.



[Source: Web Teacher](#)



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# CMS Survey Question for Staff

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Did the facility maintain documentation of screening, education, offering and current COVID-19 immunization status?



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# Record Review for Staff

Surveyor is looking for staff documentation to support:

- Screening and vaccine eligibility.
- Education of benefits, risk and potential side effects.
- Offering of vaccine or information on obtaining vaccine.
- Administration of vaccine if accepted.



[Source: Request Copies of Your Medical Records](#)



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# Review of Facility Policy

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Surveyors will review the policy for:

- How staff are educated on benefits, risk, and potential side effects for each dose.
- How staff are screened, vaccine is offered, and consent is obtained.
- How information on other locations to obtain vaccine is provided.
- How vaccination status is documented.



[Source: Book Binders free stock photo](#)



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# Interview with Staff

Surveyors will be inquiring for:

- How education is provided.
- How staff are screened, vaccine is offered, and consent is obtained.
- How information on other locations to obtain vaccination is provided.
- How vaccination status is documented.



[Source: Bing](#)



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# Interview with Infection Preventionist

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The Infection Preventionist (IP) may be interviewed regarding concerns with staff COVID-19 vaccinations.



[Source: Pic Server](#)



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# Interview with Administration

The facility administration may be interviewed regarding concerns with staff COVID-19 vaccinations.



[Source: Wikimedia](#)



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# Potential Citations



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# BOSC Citations and Common Findings with Solutions

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# Citation – F883 (Influenza and Pneumococcal)

Surveyor's investigation will show the facility failed to:

- Develop, maintain, and follow policies and procedures for resident influenza and pneumococcal immunizations.
- Provide and/or document provision of pertinent education regarding immunizations to residents.
- Vaccinate an eligible resident with the influenza or pneumococcal vaccine(s).
- Permit declination of influenza or pneumococcal vaccination by the resident.
- Document the receiving of or not receiving of the influenza and pneumococcal vaccines.



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# Citation – F887 (COVID-19 for Residents)

Surveyor's investigation will show the facility failed to:

- Develop, maintain, or follow policies and procedures for COVID-19 immunizations of residents.
- Provide and document provision of pertinent vaccine education to residents.
- Vaccinate an eligible resident for COVID-19.
- Permit declination of the COVID-19 vaccination by the resident.
- Document the receiving of or not receiving of the COVID-19 vaccine.

# Citation – F887 (COVID-19 for Staff)

Surveyor's investigation will show the facility failed to:

- Develop, maintain, or follow policies and procedures for COVID-19 immunizations of staff.
- Provide and document provision of pertinent vaccine education to staff.
- Offer vaccine to eligible staff or direct staff to where vaccination could be obtained.
- Permit acceptance or declination of the COVID-19 vaccination by the staff and change their decision.
- Document education of benefits and potential side effects to staff, offering of the COVID-19 vaccine or information on obtaining it to staff, and staff vaccine status and related information per the CDC's Prevention's National healthcare Safety Network (NHSN).



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# Additional Potential Citations

## Resident Rights:

- F551 – Rights exercised by representative.
- F553 – Right to participate in planning care.



[Source: Static Flickr](#)



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# Additional Potential Citations (cont.)

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## Physician services:

- F711 – Physician orders.



[Source: Better Health While Aging](#)



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# Additional Potential Citations (cont.)

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Nursing services:

- F725 – Sufficient Nursing Staff.
- F726 – Competent Nursing Staff.



[Source: Nurses Uniform Free Stock](#)



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# Additional Potential Citations (cont.)

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## Infection Control:

- F880 – Infection Prevention and Control.



[Source: Picserver](#)



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# BOSC Survey Statistics and Common Findings



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# ODH/BOSC 2023 Statistics

- F883 (Influenza / Pneumococcal):
  - D level = 44 times.
- F887 (COVID-19):
  - D level = 18 times.



[Source: CMS](#)



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# Common F883 Citation Findings & Solutions

## Common BOSC Findings:

- Not offering influenza or pneumococcal vaccinations.
- Not providing education of benefits and risk prior to vaccination administration.
- Not administering vaccination timely after resident provides consent.

## Potential Solutions:

- Screening upon admission of vaccination needs and tracking while in the facility.
- Having the education of benefits and risk on the consent/declination form.
- Having vaccine on hand when consent received or documentation to support vaccine delay.

# Common F883 Citation Findings & Solutions (cont.)

## Common BOSC Findings:

- Not providing the correct pneumococcal vaccine to residents.
- Not properly documenting consents and declinations of vaccinations.

## Potential Solutions:

- Use the CDC's PneumoRex VaxAdvisor.
- Use a spreadsheet for tracking purposes.



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# Common F887 Resident Citation Findings & Solutions

## Common BOSC Findings:

- Not offering COVID-19 initial vaccinations or boosters.
- Not providing education of benefits and risk prior to vaccination administration.
- Not obtaining resident consent prior to administering the vaccination.

## Potential Solutions:

- Screening upon admission of vaccination needs and tracking while in the facility.
- Having the education of benefits and risk on the consent/declination form.
- Visually confirming the consent prior to retrieving the vaccine from storage.



# Common F887 Staff Citation Findings & Solutions

## Common BOSC Findings:

- Not offering COVID-19 vaccinations to staff.
- Not providing education of benefits and risk of the COVID-19 vaccine.

## Potential Solutions:

- Screening upon hire of vaccination needs and tracking while an employee.
- Having the education on the consent/declination form or a separate signed/dated COVID-19 vaccination education form.



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# Three, Two, One

- Three reasons immunizations are important.
- Two things your facility is doing correctly.
- One area your facility needs assistance with.



Source: Microsoft Stock Images



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# QUESTIONS?

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**Contact the Bureau of Survey and Certification:**

(614) 466-3543

ODH.OHIO.GOV

Christine Meinke, LSW, LNHA, Provider Resources Education Program (PREP) Supervisor

Email: [Christine.Meinke@odh.ohio.gov](mailto:Christine.Meinke@odh.ohio.gov)

Darcie Anderson, RN, MSN PREP, Nursing Educator

Email: [Darcie.Anderson@odh.ohio.gov](mailto:Darcie.Anderson@odh.ohio.gov)



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