July 23, 2018

Q: Pursuant to Survey and Certification Letter 18-15 ([S&C 18-15](#)), will completion of the proposed CMS Training Course meet the new RoP requirement of the Infection Preventionist?

A: **Response from CMS** - CMS has not released interpretive guidance for this requirement, but our intention in developing this training is that it will meet the requirement highlighted below, which is 42 CFR 483.80(b)(4). There may be many other trainings currently available that would meet this requirement as well ([AHCA has an approved course](#)), but as previously stated, the interpretive guidance is not yet available. Furthermore, in order for a facility to be in compliance, all four requirements must be met - 42 CFR 483.80(b)(1-4). The Infection Preventionist requirement is to go into effect on November 28, 2019. Each facility must have someone trained that meets the requirements below on that date.

(b) **Infection preventionist. The facility must designate one or more individual(s) as the infection preventionist(s) (IPs) who are responsible for the facility’s IPCP. The IP must:**
(1) Have primary professional training in nursing, medical technology, microbiology, epidemiology, or other related field;
(2) Be qualified by education, training, experience or certification;
(3) Work at least part-time at the facility; and
(4) Have completed specialized training in infection prevention and control.