

**CITY OF PASADENA HEALTH OFFICER ORDER
FOR THE CONTROL OF COVID-19**

**REVISED ORDER FOR THE PREVENTION OF COVID-19 TRANSMISSION IN
SKILLED NURSING FACILITIES TO ALIGN WITH ORDERS FROM THE CA
DEPARTMENT OF PUBLIC HEALTH**

**THIS ORDER SUPERSEDES THE DECEMBER 16, 2021 ORDER FOR THE
PREVENTION OF COVID-19 TRANSMISSION IN SKILLED NURSING
FACILITIES AND REVISIONS ISSUED JANUARY 24, 2022 AND FEBRUARY 17,
2022. THIS ORDER IS IN EFFECT IMMEDIATELY UNTIL RESCINDED IN
WRITING BY THE HEALTH OFFICER.**

Revised Order Issued: September 27, 2022

UPDATES IN THIS ORDER HIGHLIGHTED IN YELLOW:

- Updates masking requirements to align with City of Pasadena Health Officer Order Requiring Wearing of Face Masks in all Health Care Settings issued on September 27, 2022.

This Order is in effect immediately until rescinded in writing by the Health Officer.

Please read this Order carefully. Violation of or failure to comply with this Order is a crime punishable by fine, imprisonment, or both. (California Health and Safety Code §120295.)

SUMMARY OF THE ORDER:

During a State of Emergency, California law empowers the City of Pasadena Health Officer (Health Officer) to take necessary protective measures to protect the public from a public health hazard. The spread of COVID-19 remains a substantial danger to the health of the public and to patients/residents and staff in licensed skilled nursing facilities (SNFs) in Pasadena. Infection control, regular testing of residents and employees, screening testing for all visitors and physical distancing measures are needed to stem or slow the spread of COVID-19 and decrease the risk of transmission to vulnerable patients/residents in high-risk health care settings. Accordingly, the Health Officer hereby requires all licensed skilled nursing facilities (“Facility”), operating within the City of Pasadena Public Health Jurisdiction, to comply with all measures in this Order. The required measures are intended to reduce the transmission of COVID-19 in these facilities and to protect residents and personnel.

This Order is based upon scientific evidence and updated best practices known to protect

patients, personnel, and the public from the avoidable risk of serious illness and death resulting from COVID-19, as well as to protect the health care system from a surge of cases. The required actions are consistent with guidance from the US Centers for Disease Control and Prevention (CDC), the US Centers for Medicare & Medicaid Services (CMS), the California Department of Public Health (CDPH).

Compliance with this Order is required because the City Health Officer has determined that:

- There continues to be very **HIGH** community transmission of COVID-19 in Pasadena and in surrounding Los Angeles County (as those terms are defined by the CDC Indicators for Levels of Transmission), which continues to present a significant risk of harm to the health of residents, driven by the Omicron variant of the SARS-CoV-2 virus.
- The Omicron variant spreads more easily than the original virus that causes COVID-19 and the Delta variant. The CDC expects that people with Omicron infection can spread the virus to others, even if they are vaccinated or do not have symptoms. Current vaccines lower the risk of infection and help protect those who are infected from severe illness, hospitalization, and death, with the greatest protection provided by up to date vaccination status including booster doses, when the individual is eligible.
- The communal nature of SNFs and the population served (generally older adults with underlying medical conditions) put those living in SNFs at increased risk of contact with the virus and severe illness from COVID-19 if infected.
- Physical distancing measures alone may not be effective in SNFs due to the concentration of individuals and the nature of the services provided to residents.
- Due to the current very HIGH rates of community transmission of COVID-19 in Pasadena and surrounding Los Angeles County, visitors to SNFs and staff may be unknowingly infected with COVID-19 (i.e., are asymptomatic or pre-symptomatic) and may transmit the virus to patients/residents or staff. Limiting non-essential contact and prohibiting access from individuals with fever or respiratory symptoms and individuals who have been in contact with people who have COVID-19 reduces the chance for exposure to COVID-19 for vulnerable patients/residents.

UNDER THE AUTHORITY OF THE CALIFORNIA HEALTH AND SAFETY CODE SECTIONS 120175 et seq., AND THE PASADENA MUNICIPAL CODE SECTION 8.04.010, THE CITY OF PASADENA HEALTH OFFICER ORDERS:

1. Entry and Access to the Facility

- a. The facility can only allow entry and access to staff, first responders including emergency service personnel, contracted healthcare professionals including consultants and service providers, and essential visitors and other permitted visitors, as per latest California Department of Public Health (CDPH) All

Facilities Letter (AFL), posted at:

- b. <https://www.cdph.ca.gov/Programs/CHCQ/LCP/Pages/AFL-20-22.aspx> and reflected in the Los Angeles County Department of Public Health (LAC DPH) SNF Guidance:

<http://ph.lacounty.gov/acd/ncorona2019/healthfacilities/snf/prevention>.

Essential visitors (as defined in CDPH AFL 20-22

<https://www.cdph.ca.gov/Programs/CHCQ/LCP/Pages/AFL-20-22.aspx>) are

exempt from the testing requirement above and cannot be restricted access to any zone within the Facility.

- c. The Facility must require all persons to undergo an entry screening as directed by PPHD and as described in the LAC DPH SNF Guidance: <http://ph.lacounty.gov/acd/ncorona2019/healthfacilities/snf/prevention>. This includes all staff, residents, and essential and non-essential (general) visitors. Anyone with a fever or symptoms of COVID-19 is prohibited from entering the Facility. The only exception to entry screening is Emergency Medical Service (EMS) workers.
- d. Facilities shall ensure that all Facility residents, employees, contracted healthcare professionals including consultants and services providers, and other staff, regardless of their COVID-19 vaccination status, who may encounter residents shall undergo once-weekly COVID-19 testing to screen for infection. Those who show documentation of recovery from COVID-19 within the last 90 days (i.e., a positive COVID-19 viral test result on a sample taken no more than 90 days before) are exempt from this requirement.
- e. For purposes of this Order: “Premises” includes, without limitation, the buildings, grounds, facilities, driveways, parking areas, and public spaces within the legal boundaries of a Facility.

2. Follow PPHD Directives regarding Staff Return to Work

- a. All healthcare workers must be cleared by PPHD in order to return to work. Complete return to work clearance form at : <https://healthforms.cityofpasadena.net/v/WorkClearanceForm>. Contact nursing@cityofpasadena.net with questions.

3. Follow PPHD Directives and COVID-19 Testing Requirements regarding Non-Essential Visitation

- a. Visitation should be resumed and conducted in compliance with PPHD directives, [LAC DPH Guidance](#), <http://ph.lacounty.gov/acd/ncorona2019/healthfacilities/snf/prevention/#groupactivities> , and [CDPH orders/requirements](#), <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Requirements-for-Visitors-in-Acute-Health-Care-and-Long-Term-Care-Settings.aspx>.
- b. Until Pasadena and LAC’s COVID-19 case rates reach the CDC’s threshold for a Moderate rate of community transmission of COVID-19 (10 to 49.99 new

cases of COVID-19 per 100,000 persons in the past 7 days), all visitors who are two years of age or older, regardless of vaccination or booster status, must provide the Facility with their proof of the following for all indoor visits at a Facility:

- i. A negative PCR test result taken within 2 days prior to entry, or
 - ii. A negative FDA-approved antigen test result taken within 1 day prior to entry.
 - iii. Visitors who visit for multiple consecutive days are required to show proof of a negative FDA-approved SARS Co-V-2 test at least every third day (e.g., test on day 1, day 4, day 7 and so on).
- c. Once Pasadena and LAC reached the CDC's threshold for a Moderate rate of community transmission of COVID-19, visitors who show proof they are up to date (up to date means fully vaccinated and received a booster dose or fully vaccinated but not yet booster-eligible) on their COVID-19 vaccinations are not required to provide proof of a negative test result prior to indoor visitation.
 - d. Visitors who have not undergone testing for COVID-19 prior to the visit should not be refused visitation at the Facility and should be provided an FDA-approved antigen test, if possible, at the Facility on the day of the visit prior to beginning the visit.
 - e. Visitors who show documentation of recovery from COVID-19 within the last 90 days (i.e., a positive COVID-19 viral test result on a sample taken no more than 90 days before) are exempt from this requirement.
 - f. Visitors who are 18 years of age or older must present photo identification with their proof of a negative test result.
 - g. Emergency medical services personnel and essential visitors (as defined in [CDPH AFL 20-22](#)) are exempt from vaccination verification and testing requirements above and cannot be restricted access to any zone within the Facility.
 - h. Facilities must have a plan in place for tracking verified visitor vaccination status and documentation of a negative FDA-approved SARS-CoV-2 test. These records must be made available, upon request, to PPHD for purposes of case investigation.

4. Follow PPHD Directives regarding Communal Dining and Group Activities

- a. The Facility should only resume and conduct communal dining and group activities in compliance with PPHD directives and LAC DPH Guidance: <http://ph.lacounty.gov/acd/ncorona2019/healthfacilities/snf/prevention/#groupactivities>.

5. Maintain Separate Areas and Staff for Patients with or Suspected of Having COVID-19

- a. The Facility shall establish separate areas within the Facility for residents/patients who have tested positive for COVID-19 and for those who are

displaying symptoms associated with COVID-19, as directed by PPHD and described in the “Cohorting” section of the LAC DPH SNF Guidance:

<http://ph.lacounty.gov/acd/ncorona2019/healthfacilities/snf/prevention/#cohorting>.

6. All Facility Staff and Residents Must Wear Appropriate Personal Protective Equipment (PPE)

- a. The Facility shall require all staff to wear appropriate PPE, including face masks and respirators that covers their mouth and nose.
- b. The Facility is required to provide each resident with a clean non-medical face covering as frequently as needed and at least daily.

7. Follow PPHD-Recommended Infection Control Directives

- a. The Facility must follow all infection control guidance as directed by PPHD and in the “Infection Prevention and Control Considerations” section of the LAC DPH SNF Guidance:
<http://ph.lacounty.gov/acd/ncorona2019/healthfacilities/snf/prevention/#InfectionPrevention>.

8. Review and Comply with Interfacility Transfer Rules

- a. The Facility shall review and comply with State and PPHD directives regarding the transfer of patients to a licensed acute-care hospital or another congregate health care facility and regarding the return of patients to the Facility from a licensed acute-care hospital or another congregate health care facility, including following LAC DPH COVID-19 Interfacility Transfer Rules:
<http://ph.lacounty.gov/acd/NCorona2019/InterfacilityTransferRules.htm>. PPHD will make final determinations regarding a Facility's inability to comply with State, LAC DPH, and PPHD guidance regarding the transfer and return of patients to the Facility.

9. Take Any Additional Actions, as Directed by PPHD to Prevent and Mitigate Outbreaks

- a. These additional actions may include, but are not limited to, testing of patients/residents and staff. This may include individuals with and without symptoms, as requested or per guidance provided by PPHD and the California Department of Public Health. All testing results should be submitted to PPHD within 24 hours of receipt.

10. Take the Following Actions to Mitigate Influenza Introduction and Transmission

- a. Offer influenza immunization to all Facility residents.
- b. Maintain a record of influenza immunization status of residents; this should document the date a person was immunized or the reason for declination.
- c. Maintain a record of influenza immunization status of staff; this should document the date the staff was immunized.
- d. Provide information on influenza vaccination status of residents and staff to PPHD if requested.

- e. Encourage all allowed, non-essential persons to get immunized for the current influenza season at least two weeks prior visiting the Facility. This will help decrease the risk of influenza transmission to residents and staff within the Facility.
- f. For influenza immunization information, toolkits, and locations, please visit: <http://ph.lacounty.gov/ip/influenza.htm> and <https://vaccinefinder.org/find-vaccine>. For the Pasadena Health Officer Order requiring influenza vaccination of Healthcare Workers, visit: <https://www.cityofpasadena.net/public-health/health-order/influenza/>.

11. Report ALL Facility Staff and Residents with Suspected/Confirmed COVID-19 Illnesses and Deaths to PPHD

- a. The Facility shall report all confirmed or suspected COVID-19 cases and deaths within 24 hours to PPHD. For more information see: <https://www.cityofpasadena.net/public-health/healthcare-providers/>
 - i. Healthcare providers must report all patients with a positive PCR/NAAT or antigen test for COVID-19 within one day. Report positive test results using the [COVID-19 Provider Reporting Form](#).
 - ii. COVID-19 associated deaths must be reported by healthcare providers within 24 hours by completing the [Novel Coronavirus Death Report PDF form](#) and send via secure by email to nursing@cityofpasadena.net or fax to 626-744-6115.

12. Offer, Track and Report COVID-19 Immunizations, as Directed by PPHD

- a. The Facility must offer COVID-19 immunization to all residents and Facility staff including directly employed staff and staff not directly employed by the Facility, paid and non-paid, who regularly enter Facility premises one time per week (7 days) or more.
 - i. For residents who have been discharged or transferred to another facility by the time the second dose is due, the Facility that administered the first dose should ensure follow-up to offer the second dose.
 - ii. For staff who no longer regularly work at or visit the Facility that administered the first dose by the time the second dose is due, the same Facility should ensure follow-up to offer the second dose if requested.
- b. The Facility must maintain a record of COVID-19 immunization status of residents; for residents who were immunized at the Facility, this record should document the date(s) the resident was immunized, the specific immunization administered, and other information as specified by the State.
- c. The Facility must maintain a record of COVID-19 immunization status of staff; this should document the date(s) the staff member was immunized; for staff members who have a medical or religious exemption, there must be documentation of the Facility-approved exemption.

- d. The Facility must provide information on COVID-19 immunization status of residents and staff to PPHD, if requested.
- e. For COVID-19 vaccine information and clinic locations, visit:
<https://www.cityofpasadena.net/public-health/covid-19-vaccine/>.

13. Follow PPHD and CDPH Requirements for Infection Preventionist Staffing, Infection Prevention and Control Training, and Quality Improvement

- a. Infection Preventionist Requirement:
 - i. The Facility's number of full-time Infection Preventionists (IPs) must be adequate to implement an Infection Prevention and Control (IPC) Program as required by [CDPH AFL 20-84](#) with expanded eligibility and minimum qualifications as per [CDPH AFL 20-51](#). Facilities deemed by PPHD to have insufficient IPs to meet these requirements will be directed to obtain additional IPs.
 - ii. At least one full-time facility IP must meet training requirements and carry out functions set forth by [CDPH AFL 20-84](#) and by Assembly Bill (AB) 2644, with expanded eligibility and minimum qualifications as per [CDPH AFL 20-51](#). Additional IP(s), if required by PPHD or CDPH/LAC DPH Health Facilities Inspection Division can be persons with approved training and who meet the eligibility and minimum qualifications per above AFLs.
 - iii. These full time IP position(s) can be achieved by dividing responsibilities among more than one staff member; each staff member must meet the full-time IPC training requirements for sharing the IP position. The Facility must have a documented plan in place on how IPC Program responsibilities are assigned over multiple staff members to meet the 40 hours per week requirement for one full-time IP.
- b. Mandatory Training for Infection Preventionist: Facilities must follow and meet the training requirements in CDPH AFL 20-84. All staff designated as IP must complete an approved Infection Prevention and Control (IPC) training that meets minimum requirements within 30 days of beginning the IP position as a new facility staff or designation to the IP position if previously employed, and annually thereafter.
- c. Mandatory Training for Facility Staff: All staff directly employed by the Facility, including ancillary staff and non-patient facing staff (including, but not limited to, dietary, environmental services, cleaning, laundry, administration, medical records, etc.) must complete infection control training that meets minimum requirements as directed by PPHD within 30 days of hire and annually thereafter. Facility must provide PPHD with the training curriculum upon request.
- d. Re-training for an Outbreak: All Facility staff must complete a PPHD-approved infection prevention training that meets minimum requirements within 3 days of the opening of the outbreak as determined by PPHD.
- e. Approved Infection Prevention and Control (IPC) Training Resources:

- i. Please refer to the webpage “COVID-19: LAC DPH Guidance & Resources”: <http://ph.lacounty.gov/acd/ncorona2019/healthfacilities/snf> for a list of all approved IPC trainings. Other training programs not listed may be considered on a case-by-case basis and must be first approved by PPHD, by contacting nursing@cityofpasadena.net.
 - ii. After completion of approved IPC training, both the staff member and SNF must retain records of training. The Facility must provide these records for review by PPHD, upon request.
- f. Infection Prevention and Control (IPC) Program Quality Improvement: The Facility must comply with PPHD on review and recommendations for improvement of their IPC Program and Quality Assurance Performance and Performance Improvement (QAPI) plan as it relates to IPC both during outbreak settings and non-outbreak settings.

14. Additional Terms

- a. This Order does not, in any way, restrict: (i) First responder access to the site(s) named in this Order during an emergency or (ii) local, state or federal officers, investigators, or medical or law enforcement personnel from carrying out their lawful duties at the site(s) named in this Order.
- b. Protocols established by the Health Officer to implement health orders issued by the State Public Health Officer or the City of Pasadena Health Officer have the same force and effect as other Orders issued by the Health Officer. To the extent any health order of the Health Officer, including any protocols established to implement any health order, is more restrictive than any order or directive issued by the State Public Health Officer, the health order of the Health Officer shall control.
- c. Violation of this Order is a misdemeanor punishable by imprisonment, fine or both under California Health and Safety Code Section 120295. This Order will be enforced by the City of Pasadena Police Department, City Attorney/City Prosecutor’s Office, and/or any other agency designated by the Pasadena City Manager for enforcement.
- d. If any subsection, sentence, clause, phrase, or word of this Order (or any other prior Order) or any application of it to any person, structure, gathering, or circumstance is held to be invalid or unconstitutional by a decision of a court of competent jurisdiction, then such decision will not affect the validity of the remaining portions of this Order (or any other prior Order).

IT IS SO ORDERED:



Eric G. Handler, MD, MPH, FAAP
Health Officer, City of Pasadena

Date: 9/27/2022