

June 13, 2015

To: Division of Quality Assurance

From: Waupun Christian Home
331 Bly Street
Waupun WI 53963

RE: Requesting Variance for DQA Numbered Memo 15-004: Wisconsin Administrative Code DHS 132.42

Waupun Christian Home & Rehabilitation Center, Inc. is requesting a perpetual variance of Wisc. Administrative Code s. DHS 132.42 (3) (a) to allow registered nurses to certify new employees as having been screened for clinically apparent communicable disease, including tuberculosis.

All new hires within the Waupun Christian Home & Rehabilitation Center, Inc. (CHRC) organization will be screened by trained designated registered nurses, within 90 days prior to beginning assignment according to the CDC Core Curriculum. The Waupun CHRC policies regarding pre-employment screening are approved by the Waupun CHRC Medical Director, Dr. R. Nagle, MD.

The designated registered nurses will receive training /education to screen for clinically apparent communicable diseases, including tuberculosis. The designated registered nurses will be practicing under a written physician's order. The written protocol has been developed and will be presented to the Medical Director for input /review.

We are requesting this variance due to the fact that we are a religious organization-entity that conducts screenings for clinically apparent communicable disease, including, tuberculosis within the CHRC organization. We utilize our in-house registered nurses to do the screenings, therefore enabling CHRC to facilitate efficient onboarding of new staff.

We do not have the financial resources to send out the pre-employment screenings and to have someone other than an RN screen these individuals. The process is done with the direct accountability of the Director of Nursing, and has not been shown to have adverse effects on the health, safety or welfare of any resident or patient.

We ask that you please strongly consider our request for this perpetual variance of Wis. Admin. Code s. DHS 132.42 (3) (a). If you have any questions, please let me know.

Respectfully,

Barbara Wirkus, NHA
Waupun Christian Home & Rehabilitation Center

American Heritage

CARE CENTER

June 18, 2015

Department of Health Services
Bureau of Nursing Home Resident Care
Division of Quality Assurance
Attn: Gail Hansen, Licensing Specialist
P.O. Box 2969
Madison, WI 53701-2969

Dear Ms. Hansen:

This is a waiver request for DHS memo 15-004 that relates to pre-employment screening for Clinically Apparent Communicable Diseases (CACD). Please see below for the necessary information to consider this request.

Time Period for Waiver

This waiver is to be honored on an ongoing basis dependent upon the conditions that directly affect the code set forth by addendums to the Wis. Admin Code and/or directive from the DQA.

Alternative Action Proposed

The center's Education and Training Director and Infection Control Nurse will complete the staff screening for CACD's. This position is a board certified Registered Nurse who is capable of managing the pre-employment screening for CACD. In addition, the center's policy for the pre-employment screening for CACD will be approved by the Medical Director. Also, a physician order will be acquired that gives consent for the appointed RN to manage the screening process.

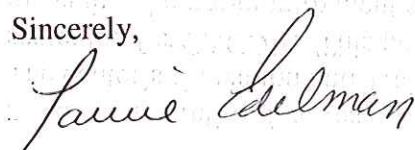
Reason for Request

The waiver is being petitioned to assist the center in further refining the efficiency and timeliness of the human resource department. The waiver would also free up the time of the Medical Director and other area physicians from the service task of completing the pre-employment screenings.

Justification

The requested waiver is in the interest of improved management of the staff screening for CACD. The effects of this waiver will not impact the health, safety, or welfare of any residents. These factors were taken into consideration when proposing this alternative action and it was determined that there would be no reason that an adverse affect would ensue.

Sincerely,



Laurie Edelman, NHA
Administrator



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