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California Department of Public Health



EDMUND G. BROWN JR.  
Governor

## AFL REVISION NOTICE

Subject: Placement of Patients with Positive *Clostridium difficile* Tests in Skilled Nursing Facilities – Revision

Revision To: AFL 10-21

Revision Date: March 25, 2011

Attachment: AFL 11-27

This notice is to inform you that the California Department of Public Health has replaced All Facilities Letter (AFL) 10-21 with the attached AFL 11-27.

AFL 11-27 takes into account the publication of AFL 10-27 ([AFL 10-27: Enhanced Standard Precautions for Long-Term Care Facilities](#)).

In the revised AFL, the California Department of Public Health (CDPH) advises skilled nursing facilities that denying placement of patients discharged from General Acute Care Hospitals following the diagnosis of *C. difficile* until these patients test negative for the infection is not an appropriate method for mitigating the infection in their facilities.

Please review the AFL and contact your local District Office if you have further questions.



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AFL 11-27  
(Supersedes AFL 10-21)

**TO:** Skilled Nursing Facilities  
General Acute Care Hospitals

**SUBJECT:** Placement of Patients with Positive *Clostridium difficile* Tests in Skilled Nursing Facilities – Revision

AFL 11- 27 supersedes AFL 10-21, and takes into account the publication of AFL 10-27.<sup>1</sup>

The purpose of this AFL is to provide information from the California Department of Public Health (CDPH) about *Clostridium difficile* (*C. difficile*) infection (CDI). Patients who are being discharged from General Acute Care Hospitals following the diagnosis of *C. difficile* are being denied placement in a skilled nursing facility until negative tests for *C. difficile* have been obtained (usually three consecutive negative tests), even if the patient is no longer symptomatic (e.g., no longer has diarrhea; that is, has formed stools). **CDPH advises against following this practice as it is not an appropriate approach for mitigating the impact of *C. difficile* in skilled nursing facilities.**

The following organizations recommend against this practice:

- The Centers for Disease Control and Prevention  
([http://www.cdc.gov/ncidod/dhqp/id\\_CdiffFAQ\\_HCP.html](http://www.cdc.gov/ncidod/dhqp/id_CdiffFAQ_HCP.html))
- The Society for Healthcare Epidemiology of America (SHEA)
- Infectious Diseases Society of America (IDSA)  
(<http://www.journals.uchicago.edu/doi/full/10.1086/651706>)
- The Association for Professionals in Infection Control and Epidemiology (APIC)

The SHEA position paper *Clostridium difficile* (*C. difficile*) in Long-Term Care Facilities for the Elderly states “There is no value to testing stools of asymptomatic individuals (including for “test of cure”), unless part of an outbreak investigation”.<sup>2</sup> As this paper from 2002

<sup>1</sup> <http://www.cdph.ca.gov/programs/hai/Documents/AFL10-27AttachmentIncluded.pdf>

<sup>2</sup> [http://www.shea-online.org/Assets/files/position\\_papers/SHEA\\_Cdiff.pdf](http://www.shea-online.org/Assets/files/position_papers/SHEA_Cdiff.pdf)

notes, as many as 20% of residents in skilled nursing facilities are colonized with *C. difficile* and will therefore test positive; this number is likely higher now as the incidence of CDI has been increasing. Therefore, a facility is not providing any increased degree of protection for its residents who are not colonized with *C. difficile* by excluding those patients who are known to be colonized (that is, test positive) from admission. CDPH recommends that long-term care facility staff use the Enhanced Standard Precautions for Long-Term Care Facilities as a guide for the development of facility-specific policies and procedures for the prevention of pathogens, including *C. difficile*

(<http://www.cdph.ca.gov/programs/hai/Documents/AFL10-27AttachmentIncluded.pdf>).

The Enhanced Standard Precautions for Long-Term Care Facilities state “Currently there is no approved EPA-registered detergent/disinfectant that is effective in killing *C. difficile* spores.” To the best of our knowledge that is still true as of March 22, 2010

(<http://www.epa.gov/oppad001/chemregindex.htm>). However, in July 2010 the U.S. Environmental Protection Agency (EPA) announced the intent to register one disinfectant (a peracetic acid/hydrogen peroxide combination) as effective against *C. difficile* spores. Other similar disinfectants have product information claiming efficacy against *C. difficile* spores based on test results required for EPA approval

(<http://www.epa.gov/oppad001/cdif-guidance.html>), and are sometimes advertised by vendors as EPA approved for this use. Staff in healthcare facilities responsible for the selection of disinfectants are advised to request EPA approval information for products they are evaluating, and monitor the EPA website for further information on the approval of disinfectants for efficacy against *C. difficile* spores. You can also find the current Pesticide Product Label in the [California Department of Pesticide Regulation \(CDPR\)](#) website.

For questions about CDI, contact the Healthcare-Associated Infections Program at [infectioncontrol@cdph.ca.gov](mailto:infectioncontrol@cdph.ca.gov) or by phone at (510) 412-6060. Hospitals and skilled nursing facilities can contact their Licensing and Certification Program District Office for information about regulations regarding admission and placement in skilled nursing facilities.

Sincerely,

**Original Signed by Pamela Dickfoss**

Pamela Dickfoss  
Acting Deputy Director  
Center for Health Care Quality