An infection control breach is reported to the appropriate licensing authority (NJDHSS Division of Health Facilities Licensing and Evaluation, NJDLPS Division of Consumer Affairs Professional Licensing Boards)

Each licensing authority performs an initial investigation that identifies poor practice, with no known disease

Licensing agency reports to and consults with NJDHS S CDS

CDS representative from the ID Team reviews and evaluates the investigation report and shares internally with team members including the medical director:
- Describes the breach;
- Compares associated practice to acceptable standard practice;
- Evaluates according to CDC algorithm * to determine if breach is category A or B.

CDS conferences with representatives from the licensing agency, regional epidemiologist, the LHD and possibly other experts, as needed, to discuss evaluation and develop a plan of action:
- Category A breaches involve a gross error or demonstrated high-risk practice and warrant patient notification and testing;
- Category B breaches involve a lower likelihood of blood exposure and therefore include additional factors before a decision is made — consider the potential risk of transmission, public concern, and the duty to warn vs. harm of notification.
- Additional issues to be included in the action plan: need for additional site visit, patient and associated staff interviews; who will develop communication materials; consideration of post-exposure prophylaxis if appropriate; who will conduct testing, obtain consent and/or perform counseling if appropriate; determine if follow-up testing is needed; facilitate public inquiry and communication; and address media and legal issues.

* Based on CDC’s guidance in the December 2008 article entitled, “Developing a broader approach to management of infection control breaches in health care settings,” AJIC, vol. 36 no. 10.