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Survey Process

Dave Lishinsky, PT – Vice President of Clinical Compliance

Kathy Kemmerer, NAC, RAC-CT - Nurse Consultant

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Managing the New Survey Process

- ▶ The first two (2) days will be mainly conducted on the units, surveyors will divide and conquer, as a new aspect to the survey process

Why Were Changes Required?

- ▶ Changes were required due to:
 - ▶ The need to develop one process for use across the nation
 - ▶ To promote consistency
 - ▶ The need to conduct, organize and systematize investigations
 - ▶ Focus on person-centered care

What's New?

- ▶ Survey sampling
- ▶ Focus on resident-centered outcomes
- ▶ New triggered tasks
- ▶ Resident-centered processes
- ▶ Focus on quality care and quality of life

Recommending QAPI: The New Survey Process

- ▶ Keeping the Residents in the Loop
 - ▶ Providers should take the time to inform the residents and families of the new regulatory changes that govern long-term care
 - ▶ Residents and families should be informed about the new survey process itself

Seven Steps in the Long-Term Care Survey Process (LTCSP)

- ▶ Off site-prep
- ▶ Survey sampling
- ▶ Focus on resident-centered outcomes
- ▶ New triggered tasks
- ▶ Resident-centered processes
- ▶ Focus on quality care and quality of life

Seven Steps in the Long-Term Care Survey Process (LTCSP)

- ▶ Off-site Prep – Inspectors Review and Organize
 - ▶ Repeat deficiencies
 - ▶ Complaints
 - ▶ Variances/waivers
 - ▶ Results of last standard survey
 - ▶ FRIs (Facility reported incidents – federal only)
 - ▶ Necessary documents are printed
 - ▶ Closed record sample
 - ▶ Nine (9) mandatory facility tasks and unit assignment
 - ▶ Dining observation
 - ▶ Infection control
 - ▶ Sufficient and competent nurse staffing

Seven Steps in the Long-Term Care Survey Process (LTCSP)

- ▶ Facility Entrance – Upon entry into the facility, the Team Coordinator (TC) will:
 - ▶ Introduce themselves and the survey teams, and request to see the administrator and/or DON
 - ▶ Request the facility provide a place where the survey team can work
 - ▶ Schedule the entrance conference with the Administrator and/or DON (time for meeting)
 - ▶ Conduct a brief entrance conference with the administrator/designee
 - ▶ Provide a copy of the entrance conference form
 - ▶ Request information regarding a full-time DON
 - ▶ Request information about the facility's emergency water source (verbal accepted)
 - ▶ Provide signs announcing the survey in high-visibility areas
 - ▶ Request a copy of an updated facility floor plan, if changes have been made
 - ▶ Request the name of the Resident Council President
 - ▶ Provide the administrator or designee with a copy of the CASPER 3 report

Seven Steps in the Long-Term Care Survey Process (LTCSP)

- ▶ Requested information needed immediately upon entrance
 - ▶ Facility census number
 - ▶ Complete matrix for new admissions in the last thirty (30) days who are still residing in the facility
 - ▶ An alphabetical list of all residents
 - ▶ A list of residents who smoke and their designated smoking times and location
- ▶ Requested information needed within one (1) hour of entrance
 - ▶ Schedule of medication administration times
 - ▶ Number and location of medication storage rooms and medication carts
 - ▶ The actual working schedules for LNs and RNs for the survey time-period
 - ▶ List of key personnel, location, and phone numbers
 - ▶ Information on paid feeding assistants, if applicable
 - ▶ Schedule of mealtimes, locations of dining rooms, copies of all current menus, and the policy for visitor-provided food

Seven Steps in the Long-Term Care Survey Process (LTCSP)

- ▶ Dining room and tray observations
 - ▶ This is the first full meal after entry into the facility:
 - ▶ All dining areas are covered, including room trays
 - ▶ If there are more dining areas than surveyors, surveyors will monitor dining rooms for those resident who require the most assistance
 - ▶ **Note:** Additional dining/room tray observations will be conducted as needed

Initial Pool Process

- ▶ **Required information needed within four (4) hours of entrance**
 - ▶ Complete Matrix for all other residents
 - ▶ Admission packet
 - ▶ Dialysis details and hemodialysis/peritoneal dialysis staff
 - ▶ Hospice information
 - ▶ Infection and influenza protocols
 - ▶ QQQ committee information
 - ▶ QAPI Plan
 - ▶ Abuse prohibition policy and procedures
 - ▶ Experimental research
 - ▶ Facility-wide assessment
 - ▶ Nurse staffing waivers
 - ▶ Rooms requiring a variance

Information needed at the end of day one

- ▶ Facility should provide each surveyor with access to all resident Electronic Health Records (EHRs)
 - ▶ Do not exclude any information that should be a part of the resident's medical record
- ▶ Provide specific information on how surveyors can access the EHR outside the conference room
- ▶ Providers will complete the "EHR information" form
- ▶ Completed Medicare/Medicaid Application (CMS-671)
- ▶ Completed census and condition information (CMS-672)
 - ▶ Discussion of this changing to part of the pre-survey process and part of the MDS based process – (not in effect, just in discussion stage)
- ▶ Completed Beneficiary notice worksheet that identifies those residents discharged from Medicare covered Part A stay with benefit days remaining within the last six months

Sample Selection

- ▶ Resident interviews and observations
 - ▶ Critical component of resident-centered approach
 - ▶ Surveyors will request a list of new admissions
 - ▶ Resident interviews and observations are conducted
 - ▶ Screen every resident
 - ▶ Suggest questions – but not a specific surveyor script
 - ▶ Must cover all care areas
 - ▶ Include rights, QOL, QOC
 - ▶ Investigate further or no issue
 - ▶ Potential deficient practice

Investigation

- ▶ Limited record review
- ▶ Surveyors will conduct limited record review, including but not limited to:
 - ▶ Obtaining specific care area information for non-interviewable residents
 - ▶ Verifying information provided by the resident/representative
 - ▶ Identifying high-risk medications
 - ▶ Clarifying identified discrepancies
 - ▶ Reviewing advanced directives
 - ▶ No formal staff interviews are conducted during the initial pool process
 - ▶ Special circumstances
 - ▶ Inability to access EHRs
 - ▶ Time constraints
 - ▶ Other considerations

Ongoing and Other Survey Activities

- ▶ For the remainder of the survey, surveyors will:
 - ▶ Continue in-depth investigations
 - ▶ Complete mandatory facility tasks
 - ▶ Triggered facility tasks
 - ▶ Potential citation review

Seven Steps in the Long-Term Care Survey Process (LTCSP)

▶ Potential Citations

- ▶ Once the survey team has completed all its in-depth investigations and facility tasks, the team will conduct one final meeting to:
 - ▶ Discuss pertinent survey findings
 - ▶ Discuss potential non-compliance findings
 - ▶ Determine potential citations

▶ Exit Conference

- ▶ The exit conference is conducted in the same manner as previous surveys
- ▶ The exit conference should include key individuals
- ▶ During the exit conference, the TC has specific responsibilities

Reminder

- ▶ The goal of these changes is not to target facilities but to focus on person-centered care
 - ▶ Your director of nursing plays a vital role in the process
 - ▶ The Entrance Conference Worksheet will make or break your survey
 - ▶ Communication with staff and residents is key
 - ▶ Medication reconciliation and disposal is a big-ticket item
 - ▶ Resident interviews are a critical component
 - ▶ Citations can negatively impact licensure, reimbursements, Five-Star Rating, and more
 - ▶ It takes only **one resident** to put your facility at risk

References

- ▶ Centers for Medicare and Medicaid Services (CMS, 2017). Long-Term Care Survey Entrance Conference and Provider Matrix.
 - ▶ <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Nursing-Homes.html>
- ▶ Centers for Medicare and Medicaid Services (CMS, 2017). Long-Term Care Pathways.
 - ▶ <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Nursing-Homes.html>

Resources

- ▶ <https://www.whca.org/files/2017/10/DOH-Entrance-Conference-Worksheet.pdf>
- ▶ <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Downloads/Matrixwith-Instructions-Content-Unchanged.pdf>
- ▶ <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Downloads/LTCSPProcedure-Guide.pdf>
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Questions?

Thank you!



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dlishinsky@feeltheadvantage.com

Kathy Kemmerer, NAC, RAC-CT - Nurse Consultant

kkemmerer@feeltheadvantage.com