

Highlights from New Long-Term Care Surveyor Guidelines

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Regulatory areas with changes

- **Admission, transfer, and discharge**
- **Chemical restraints/unnecessary psychotropic medications**
- Resident Assessment
- Quality of life/quality of care
- Administration
- Quality Assurance Performance Improvement (QAPI)
- Infection Prevention and Control
- Other areas



Timeline for Implementation

- Implementation planned for February 24, 2025
- Guidance training available in the Quality, Safety, and Education Portal (QSEP) at <https://qsep.cms.gov/welcome.aspx>
- Download (includes Critical Pathways and Appendix PP) available at: <https://www.cms.gov/medicare/health-safety-standards/quality-safety-oversight-general-information/policy-memos-states/revised-long-term-care-ltc-surveyor-guidance-significant-revisions-enhance-quality-and-oversight-ltc>

Admission ~ Transfer ~ Discharge

- F620 Admission Agreement
 - Guidance r/t prohibiting request or requirement of third-party payment guarantee
- F622 – F626, F660 & F661: Deleted; guidance incorporated into 2 new tags:
 - F627: NEW - Inappropriate Transfer or Discharge
 - F628: NEW - Transfer/Discharge Process

Transfer and Discharge Guidance

Discharge due to:

- Inability to meet needs
 - No evidence of facility attempt to meet needs
 - Lack of assessment
- Improvement of resident's health
 - Lack of evidence of improvement
- Endangerment of safety or health of other residents
- Failure to pay
- Pending appeal

Unnecessary Medications, Chemical Restraints/Psychotropic Medications, Medication Regimen Review

- F758 has been incorporated into F605
- Reinforce requirement that facilities prevent use of psychotropic medications
- Guidance regarding “convenience” revised to include situations of sedation
- Emphasize need for resident participation in treatment decisions—right to accept or decline

Unnecessary Medications, Chemical Restraints/Psychotropic Medications, Medication Regimen Review

- Record Review
 - Record review for residents with diagnosis of schizophrenia
 - Change of status—signs of adverse reactions/response
- Interviews
 - Resident, Family or Representative
 - Staff—nursing, social services
 - Attending physician, pharmacist, Medical Director

Resident Assessment

- MDS accuracy
 - Inaccurate diagnosis coding i.e., schizophrenia
 - Referrals to State Boards
- Coordination/Certification of Assessment (F642) deleted and moved to Accuracy of Assessment (F641)

Quality of Life ~ Quality of Care

- Areas with added guidance:
 - CPR
 - Pain Management
 - Updated definitions
 - Interviews (Resident/Rep./Family/Nurse/DON/MD)
 - Respiratory Care
 - Staff interviews
 - Record review
 - Mechanical Ventilation/Tracheostomy

Quality Assurance Performance Improvement (QAPI)

- Health Equity
 - Definition
 - Feedback
 - Monitor sub-populations
 - Consideration when establishing priorities

Infection Prevention and Control

- Guidance on Enhanced Barrier Precautions (EBP) added to Appendix PP
 - Definition of EBP
 - Indications for use
- Covid-19 Immunizations
 - Definitions
 - Education requirements
 - Offering vaccines/administration/adverse Event Reporting
 - Vaccine refusal
 - Documentation requirements

Expanding Responsibilities of Medical Director

Responsible for:

- Overseeing implementation of policies r/t resident care
(e.g., physician compliance with facility policies r/t diagnoses and prescribing of medication, to ensure sufficient documentation to support decisions)
- Participating in facility's quality assessment and assurance committee
- Addressing issues r/t coordination of medical care as may be identified
- Active involvement in facility assessment

Resources

CMS Framework for Health Equity:

<https://www.cms.gov/about-cms/agency-information/omh/health-equity-programs/cms-framework-for-health-equity>

CDC's Implementation of PPE Use in NHs to Prevent Spread of Multidrug-resistant Organisms:

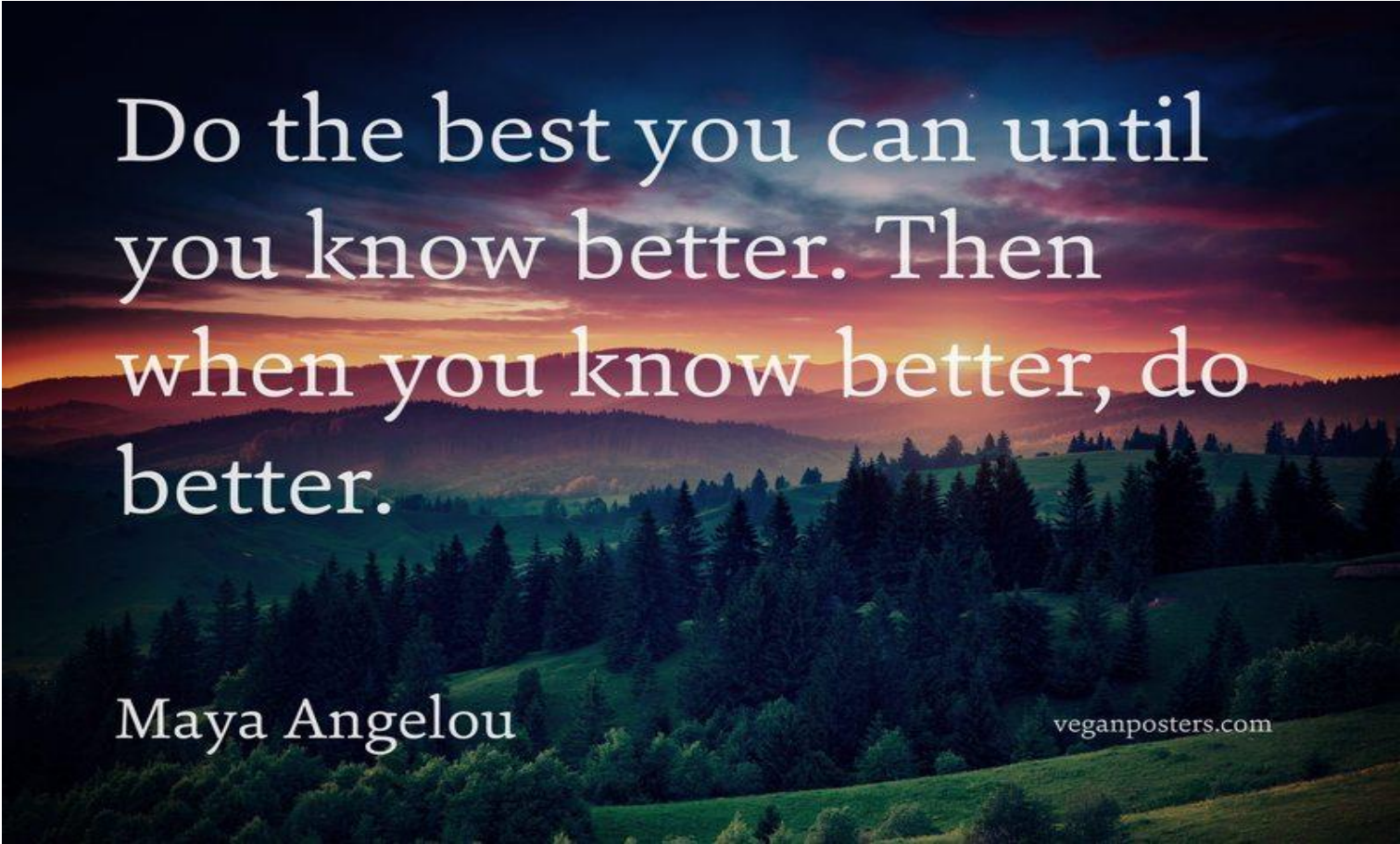
<https://www.cdc.gov/hai/containment/PPE-Nursing-Homes.html>

Thank You!

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Questions?





Do the best you can until
you know better. Then
when you know better, do
better.

Maya Angelou

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