

## Long-Term Care Survey Alert

### Environmental Hazards: 4 Steps To Banish Bugs And Related F Tags

#### **It's not enough to just have a pest control program.**

Pests such as roaches, flies and ants are more than a nuisance: They can jeopardize residents' health, scare off consumers - and even land your facility with an immediate jeopardy citation.

It's a "no brainer" that nursing facilities with a chronic pest control problem need a professional pest control program. But that's not enough, warns **Jay Adams**, the Tallahassee attorney who represented a Florida facility cited with immediate jeopardy when a resident was attacked by fire ants.

If the surveyors see more than an occasional bug - for example, cockroaches in a couple of residents' rooms - they will no doubt ask to see the facility's pest control contract and service record. "If the contract only calls for treatments every six weeks, that's probably not going to suffice if there's a problem," Adams warns. Luckily, the Florida facilities charged with IJ for fire ant attacks had aggressive pest control programs in place, Adams says. And that fact, along with expert testimony about these insects' propensity for attacking helpless victims, led an administrative judge to rule that fire ants cannot always be avoided in Florida.

"Surveyors recognize, in general, that nursing homes ... are justified in relying on the advice of their pest control companies - as long as there's not an obvious problem requiring more aggressive action on the facility's part," Adams adds. But if pests are obvious and constant, and the facility isn't taking additional action or trying to get to the root of the problem, watch out.

#### **Debug Now**

The following four key strategies can help move you into a pest-free zone or at least show surveyors you're doing your best to get there.

**Obtain the best possible pest control contractor willing to meet your bottom line.** "Make it clear to contractors that your bottom line is identical to that of regulators," and if they can't meet it, you'll find a company that will, suggests **Kurt Haas**, former Ohio survey bureau chief and currently a consultant in Lithopolis, OH.

Check the pest control company's references from other nursing homes just like you check employees' references, suggests **Ivar Vankemenade**, marketing manager for **McCloud Pest Control Services** in the Chicago area. If you have a chronic problem, look for reputable companies that promise to eliminate an infestation or chronic problem that an existing pest control provider has been unable to solve. But before you sign on, check the fine print spelling out the actual terms of such deals (such as money-back guarantees) and the company's references.

**Document how you are following the pest control company's recommendations.** "For example, if the pest control company advises the facility to trim its bushes and remove branches from near the roof [to keep pests from gaining access to the building], the facility should comply - and document that it did," Adams emphasizes.

**Prevent a 'bugs out, bugs in' problem.** Facilities will never get rid of a pest control problem if food vendors keep bringing in new supplies of cockroaches and other vermin. So it pays to inspect suppliers' food products. You can reject the product before it's brought into the facility and, if the problem continues, switch suppliers," counsels **Pat Hottel**, director of technical services for McCloud. "Many large food processors and restaurant chains will inspect their vendors for pest activity as a condition of purchase," she adds.

**Be prepared to show proof of your progress.** Ask how a pest control company will help the facility objectively measure inroads being made in the bug battle, which can give you some peace of mind - and also provide documentation to convince surveyors that a pest problem is actually getting better.

"Some people say that if you see one roach, there are thousands more, but that can be misleading advice," says Hottel. "A professional pest control company should use glue trap monitors (little sticky boards) to check for the numbers of roaches or other pests," she says. "That way, you'll have some clear idea if the problem is improving or getting worse."

**Tip:** Bugs are bad, but toxic fumes aren't good for residents and staff either. "A good pest control company addresses the toxicity issue by using both non-chemical and chemicals low in toxicity when managing pests. In general, insecticide baits are a good choice," Hottel says.