

Long-Term Care Survey Alert

RAI COMPLIANCE: Detect This RAI Compliance Shortcoming Before Surveyors Pull You Up Short

This strategy can tell whether a quarterly should be a sig change assessment.

There's only one thing worse than failing to detect that a resident had a significant change before the quarterly assessment. And that is doing the quarterly and still not picking it up.

You can catch this OBRA "no no" by using your quality indicators and measures to flag residents requiring a significant change in status assessment (SCSA).

Beware: You have 14 days after you note a significant change to do the assessment, including the RAPs. And "if surveyors find the resident doesn't match the care plan or has had a significant change, they may look to see if the facility did one," cautions **Christine Twombly, RN**, a consultant with **Reingruber & Company** in St. Petersburg, FL.

Know the definition of a significant change: You don't do an SCSA for a self-limited condition but rather for a decline or improvement in two areas now thought to be permanent, says Twombly.

Run the QIs/QMs Before You Submit Your MDS

Ideally, you'd do the MDS and run it through the facility's own software program to see if a resident triggers a new QI/QM on the quarterly or other assessment, says **Cheryl Field, MSN, RN**, a consultant with **LTCQ Inc.** in Lexington, MA. "That would give staff a heads up to look closely at whether the person needs a significant change assessment."

Example: Say the resident triggers QIs or QMs for ADL decline and pain or any kind of fracture. If the "interdisciplinary team didn't do a significant change assessment," you have to question whether that makes sense, says Field. "Even a fracture of the finger could impact the person's eating and ambulation (if he used a device) and also pain tolerance."

Better Late Than Never

Even if you submit a quarterly to the state and then pull your QI/QM reports, which you can do every Monday, you can see if the resident has triggered QIs/QMs that may warrant a significant change assessment, says Field.

If so, the staff can set the ARD for the SCSA within 14 days of identifying it and do the comprehensive assessment, says Field. "If you wanted to eliminate the quarterly assessment, you'd have to inactivate it," she adds. But "don't inactivate a timely quarterly and then be late with a quarterly assessment," she cautions. The latter has to be done every 92 days (R2b of previous OBRA assessment plus 92 days).

Keep the care plan current: Twombly notes that some facilities don't change the care plan unless the resident triggers an SCSA. "They don't view the care plan as a working tool," she says, which becomes a survey issue.