

## Long-Term Care Survey Alert

### Regulatory Monitoring: Step To The Beat Of Real-Time Compliance Or Dance Yourself Into F Tags

**Good luck surviving today's regulatory milieu offline.**

If you've had trouble staying on top of recent survey changes, buckle your seatbelt because more are on their way - and get wired to the Internet in ways that keep you in the know.

Since the **Centers for Medicare & Medicaid Services** went paperless some time ago, the agency posts manual revisions online - and they're usually effective immediately. That means no leeway for implementing new requirements or "get out of jail free" card if you're caught out of compliance.

Thus, "any facility that doesn't provide open access to the Internet - especially for its management staff so they can obtain timely information - is asking for trouble," cautions **Marie Infante**, an attorney in Washington DC.

And simply visiting the CMS Web site won't help unless you know where to look for the latest updates.

**Here's where to look:** The CMS Web site address is [www.cms.hhs.gov](http://www.cms.hhs.gov). Click on "manuals" on the left to get to the Internet-only manuals and transmittals.

CMS guidance to state survey agency directors and CMS regional offices can be found at [www.cms.hhs.gov/medicaid/survey-cert/letters.asp](http://www.cms.hhs.gov/medicaid/survey-cert/letters.asp), and RAI manual updates are at [www.cms.hhs.gov/quality/mds20](http://www.cms.hhs.gov/quality/mds20).

Also sign up for the CMS e-mail lists so you will receive notice of changes. Even then, you still have to know what you're looking for, advises long-term care consultant **Reta Underwood** in Buckner, KY.

Tune into the CMS-sponsored SNF Open Door Forums. Providers can dial in to listen to the presentation and participate in the Q&A session afterwards. (Sign up for the SNF/LTC and other ODFs at [www.cms.hhs.gov/opendoor/listservs.asp](http://www.cms.hhs.gov/opendoor/listservs.asp).)

[Delegate someone in the facility to listen to the monthly ODFs and take notes or tape the sessions, advises Infante. "The ODF may be the only notice you will get about policy changes or the fact CMS has posted new information at a certain place on its Web site," she says.](#)

[Beware: Sometimes CMS' representatives will give misleading or incorrect information which they clear up at the next or a later ODF, Underwood says.](#)

[Also, "before you rely on any information disseminated in an ODF, ask to see it in writing. "If \[the information\] is not in writing somewhere, don't use it," Underwood advises.](#)