

Long-Term Care Survey Alert

SPECIAL FOCUS: Survey Management: Meet PASRR Requirements, Residents' Mental Health Needs Or Risk Survey Scrutiny

Real-life survey tale provides cautionary lessons for NFs.

The **Centers for Medicare & Medicaid Services' Nadine Renbarger** describes a real-life scenario that shows how the F tags can start flying when surveyors become alarmed at the quality of a nursing facility's mental health care.

"As we began our tour, the staff let us know most of the residents were out of the building attending day programs," relayed Renbarger in a CMS Webcast, "Mental Illness in Nursing Homes." Even so, surveyors observed many residents lying on beds napping or in a smoky activities program room. Residents were poorly groomed and dressed and had a "pretty bad body odor," Renbarger said. The bathing facilities were broken or poorly maintained. Incident reports also indicated elopements and resident-to-resident abuse.

Renbarger provided a rundown of other violations:

- The facility had ignored or poorly investigated alleged sexual abuse;
- Preadmission Screening and Resident Review (PASRR II) evaluations of residents with serious mental illness were incomplete (for details on the state's and facility's role in PASRR, see the next page). Or the PASRR information wasn't used for care planning.
- The facility's psychiatric evaluations consisted of summaries of residents' behaviors. Surveyors later found out that the social worker who prepared the evaluations wasn't credentialed.
- The activities program wasn't individualized or geared to residents' mental health issues.
- A large percent of the population had alcohol and substance abuse issues. But residents weren't participating in programs to address those issues.

Not pretty: In addition to handing out numerous tags for assessment and physical environment, surveyors cited the facility at F225 for abuse, F324 for supervision (now F323), F248 for activities -- and F251 for qualified social worker. The facility also received a deficiency at F285 for shortfalls in following the PASRR requirements (see the next page) and at F406 for deficiencies in providing specialized rehabilitation services for mental health.

The facility received immediate jeopardy deficiencies and, based on a follow-up survey, was terminated from Medicaid. "That was not a fun survey," said Renbarger, but it "certainly opened our eyes as to what might be happening in nursing facilities that aren't meeting the needs of people with mental illness."

F285 and F406 Explained

Renbarger provided an overview of the requirements for F285 and F406.

F285: The regulation states that Medicaid-certified NFs must not admit residents with statutorily defined mental illness unless the state has authorized the nursing facility's level of services and identified any special services the residents need for their MI. Surveyors should cite this tag when a resident with mental illness has no PASRR Level II evaluation from the state or when the PASRR indicates the resident doesn't need nursing facility care (if the person was admitted before the regulation went into effect), Renbarger said.

F406: Surveyors cite 406 when the facility hasn't provided specialized rehabilitation services to meet the resident's

mental health needs, explained Renbarger. Facilities are required to provide or obtain the mental health services as part of a comprehensive plan of care for residents whether or not the PASRR Level II evaluation specifies them. The mental health services might include consistent implementation of the following, says Renbarger:

- Systematic plans to change behaviors;
- Drug therapy and monitoring;
- A structured environment;
- Formal behavior modification;
- Individual, group and family therapy.

Surveyors cannot cite a facility if the state isn't providing specialized services as identified by the PASRR II, which the state is supposed to provide or arrange for, emphasized Renbarger. But in such cases, surveyors should notify their supervisor who can refer the matter to the state Medicaid agency.

Survey reality check: Consultant **Reta Underwood** in Buckner, KY, notes that even though there's no tag for failure to provide specialized services for mental illness or retardation, surveyors concerned about the lack of mental health services for a resident can still cite F309 or other catch-all tags.