

Long-Term Care Survey Alert

Staff Training: Teach Staff 'Survey Speak' To Avoid Damning 'I Don't Know' Quotes On The CMS 2567.

If you don't know the answer, this is the best route to go.

Of all the staff comments you don't want to see quoted on the statement of deficiencies, "I don't know" the emergency plan or resident's care plan, etc., tops the list.

The good news: You can teach staff a simple way to ensure they give surveyors accurate information.

That's what consultant **Lynn Peterson** does as part of an inservice explaining "survey speak," which includes how to handle scenarios where staff don't know the answer to a surveyor's question.

Example: The surveyor asks a certified nursing assistant what the facility's fire plan entails. "If the staff person just says 'I don't know,' ... you can bet ... that 'I don't know what the emergency fire plan is' will appear in the CMS 2567 with a deficiency," says Peterson, quality regulatory consultant for **Health Dimensions Group** in Minneapolis.

In teaching staff a better way to respond to questions where they don't know the answer -- or freeze and can't remember it -- Peterson lets them know it's OK to feel scared when surveyors put them on the spot. "We tell them to breathe," she says.

Next, Peterson tells them to take the surveyor to the information. For example, if the surveyor asked about the fire plan, the staff person would lead the surveyor to the emergency preparedness book and open it up, saying "This is our fire preparedness policy, and in case of a fire, this is what we do."

Another example: A surveyor may ask a CNA: "Is this resident supposed to be a one or two-person transfer or lift?" "CNAs should in all cases -- and especially during the survey -- have an assignment sheet or care plan tool that includes that type of information," emphasizes Peterson. That way, they won't guess incorrectly or say "I don't know."

"Surveyors don't expect caregivers with numerous residents to care for to know every detail, but the CNAs should be able to quickly provide it by referring to their tools."

Hot tip: Surveyors are asking nurses pointed questions during med pass such as why a specific patient is taking a medication that could have more than one indication, says **Christine Twombly, RN**, a consultant with **Reingruber & Company** in St. Petersburg, FL.

For example, seizure medications may be given for behavioral symptoms, Twombly points out. So "one thing that a lot more facilities are doing is putting the specific reason for the medication on the medication administration record (MAR)," she says. That way the nurse can simply look at the MAR to give surveyors the right answer.

Beware the perils of guessing: Attorney **Joseph Bianculli** once had a case where surveyors picked a nurse at

random to ask her a resident's code status. "The resident had just changed it from no code to full code," says Bianculli, who is in private practice in Arlington, VA. The nurse gave the wrong answer of "no code," and the surveyors cited the facility because the nurse guessed wrong instead of looking up the resident's latest status.

Practice Makes Better

During mock surveys, Peterson and her team purposefully put staff on the spot by asking them questions about a resident's care or the emergency preparedness plan, etc. "We educate staff and stop and explain what we -- acting as surveyors -- are looking for. If the staff person provides a good answer to our questions, we acknowledge that and explain why it's a good answer," Peterson relays. If the staff person doesn't answer in the right way, they coach him or her on how to respond using survey language.

Survival strategy: Encourage staff to talk to surveyors with other people around, advises **Kathy Hurst, RN, JD**, director of healthcare operations for **TSW Management Group** in Anaheim, CA, which manages nursing facilities in California. "If other people are around to corroborate what was said, that can potentially help if we [dispute a deficiency]," she says. "We can say the staff person told the surveyor such and such" in the presence of the DON and administrator.