

## Long-Term Care Survey Alert

### SURVEY & CLINICAL NEWS TO USE

Get ready for the revised F309 survey guidance to go into effect on March 31. The guidance includes a new general investigative protocol for quality of care, new pain management guidance and an investigative protocol for pain. The general investigative protocol homes in on the care plan process, including whether staff consistently implemented the care plan "over time and across various shifts."

The objective of the pain investigative protocol is to determine whether the facility has managed the resident's pain to support his or her "highest practicable level of physical, mental, and psychosocial well-being, in accordance with the comprehensive assessment and plan of care."

Some good news: "There's no 'smoking gun' in this guidance, unlike F314 [for pressure ulcers], which was so extensive and had so much clinical information," says **Rena Shephard, MHA, RN, RAC-MT, C-NE**, president and CEO of RRS Healthcare Consulting in San Diego, and founding chair and executive editor for the American Association of Nurse Assessment Coordinators. "The guidance to surveyors is ... basically saying that facilities need to implement the nursing process, which is the same process that all clinicians use: assessment, problem identification, nursing diagnosis, planning interventions, implementation and evaluation."

Even so, facilities will likely have specific vulnerabilities to receiving deficiencies at F309 in certain areas of pain management, Shephard and other experts warn (for details, see the next Long-Term Care Survey Alert).

Plavix plus a proton pump inhibitor may not a good combination make. In fact, the Food & Drug Administration recommends healthcare providers "re-evaluate the need for starting or continuing treatment with a PPI, including Prilosec OTC, in patients taking clopidogrel" (Plavix). The federal agency is working with the makers of Plavix to conduct studies that will shed more light on how genetic factors and other drugs (especially the PPIs) may impact the blood thinner's effectiveness.