

Long-Term Care Survey Alert

SURVEY MANAGEMENT: Be Strategic About Revealing Quality Assurance Efforts

Find out how to assuage surveyors' concerns, not create them.

Surveyors are on the scene for a standard annual inspection, and you know the facility has done its QA to address a couple of clinical problems that cropped up during the year. Should you cry mea culpa and fork over the QA action plan forthwith, or would it be better to use a more measured approach?

Some experts suggest holding your QA cards close to your chest while also being prepared to present a winning hand, if demanded.

The bottom line: When a surveyor starts asking questions and expressing concerns about an area that the facility has been working on in a QA plan, "that's the appropriate time to share what the facility has been doing," advises **Patricia Boyer, MSM, RN, NHA**, president of Boyer & Associates LLC in Brookfield, Wisc.

Example: One facility had done a lot of work to address problems with its care planning process. And on the facility's annual survey, surveyors expressed concern about care plans, Boyer relates. At that point, the facility unveiled the QA team's new action plan, which required nurse managers to review the care plans. The net result: The facility came away with a deficiency-free survey.

Don't be caught empty-handed: Make sure you have something to show for your QA effort besides QA meeting minutes. An effective QA process has an internal component and an external or public aspect, which includes changes to policies and procedures, teaching, and clinical programs, says attorney **Howard Sollins**, partner with Ober/Kaler in Baltimore.

Remember: Surveyors can ask for the facility's QA committee meeting minutes to evaluate whether the facility has a QA function to meet federal requirements, says **Christopher Lucas**, an attorney in private practice in Mechanicsburg, Pa. Even so, the records are confidential in the sense that surveyors aren't supposed to use them to issue a substantive citation other than F520 (failure to have a functional QA committee), he adds. If surveyors do use the QA minutes or records against the facility, the facility can take it to informal dispute resolution or appeal, advises Lucas.