

Long-Term Care Survey Alert

Survey Management: Got Gardens? Here's What CMS Could Ask You to Provide

Consider these safety tips from an agricultural pro.

In a September survey & cert memo, CMS says the agency and the FDA "have received numerous inquiries from nursing homes and State survey agencies asking if Federal law permits nursing homes to have produce gardens and use the foods harvested on the menu for any portion of the resident population."

CMS' answer: "Nursing homes with gardens are compliant with the food procurement requirements at ... F371 as long as the facility has and follows policies and procedures for maintaining the gardens. Surveyors should request the policy and procedures for maintaining nursing home gardens if there is an outbreak of food-borne illness and the facility's primary food service source has been ruled out as the cause of the outbreak. Facilities should report all outbreaks of food-borne illnesses to their local health department."

There's more: "If there are local or State requirements related to food grown on the facility grounds for resident consumption, facilities are to be in compliance with the specific State requirement," the memo states.

Nursing home consultant **Diana Waugh, BSN, RN**, thinks that the really important sentence in the memo for facilities to understand is the one that says: "Surveyors should request the policy and procedures for maintaining nursing home gardens if there is an outbreak of food-borne illness and the facility's primary food service source has been ruled out as the cause of the outbreak."

"In other words, if there's an outbreak of diarrhea and the primary food source is shown to be OK, then you'd have to produce the garden maintenance and food storage and preparation policies/procedures," says Waugh, in Waterville, Ohio. "The operative word is 'if,' which puts the control squarely in the facility's hands."

Waugh recommends facilities call their state agriculture department to find out if they have regulations or suggestions about how to grow produce safely in gardens.

"I'd be concerned about use of soil additives, insecticides, and other added nutrients," she adds.

The survey memo also notes that "the facility should be following safe food handling practices once foods are harvested and brought to the kitchen for preparation."

Agriculture Expert Provides Safety Tips

Trevor Suslow, PhD, says he doesn't think gardens create a big safety threat. "But prevention is your best tool and you want to minimize the risk of someone becoming ill," he tells Eli. "Plus, elderly nursing home patients are a more vulnerable population," adds Suslow, extension research specialist for preharvest to postharvest produce safety at University of California Davis.

For one, "you have to watch out for bird droppings, cats, rodents, etc.," Suslow says. "These animals are potential carriers of pathogens and can often get in even if you have a fenced area. Cats carry parasites that can be a problem for an immunocompromised person (toxoplasmosis)."

More expert advice: "Facilities should not use non-composted animal manure in gardens with fruits, vegetables, and herbs," Suslow says. "I've seen people do their own composting and put whatever kitchen scraps they have in it which can lead to a variety of risks and contamination concerns," he says. "They even put them around leafy vegetables

[when] bacteria like Salmonella and Listeria may still be alive."

How should you wash produce? "Under running water in a clean/sanitized sink," says Suslow, who advises against doing this in "batches in a common tub." He also points to "several consumer fruit and vegetable wash products -- usually spray-ons -- that can help remove tightly adhering soil and some chemical residues. However, running tap water is really sufficient for garden purposes."

Important: "Pay attention to your water source" for gardening, advises Suslow. "Be very cautious about using any surface water source, such as ponds or creek water, which can have runoff carrying both chemicals and pathogens from upstream sources," he warns.

Infection control expert **James Marx, RN, MS, CIC**, says he hasn't seen any food-borne illnesses associated with produce in nursing homes. "Everything I find is related to norovirus or Salmonella. There was an E. coli case related to hamburger, but none of those are associated with fruits and vegetables." (See the food safety chart from the F371 survey guidance on page 76 of this issue.)

Read the survey & cert memo at www.cms.gov/Surveycertificationgeninfo/downloads/SCLetter11_38.pdf