

## Long-Term Care Survey Alert

### SURVEY MANAGEMENT: Head Off Citations With This Stealth Strategy

**Hear how being a fly on the wall during surveys keeps F-tags at bay.**

A successful survey management effort isn't about your facility never having deficiencies -- it's about preventing them from appearing on the CMS 2567. And using the right surveillance and response tactics during inspections can help you stay a step ahead of surveyors and F tags.

"Surveyors don't realize that we have spies out there who are people working at the nurses station looking at everything surveyors pick up," says **Kathy Hurst, RN, JD**, director of healthcare operations for **TSW Management Group** in Anaheim, CA, which manages nursing facilities in California. "We observe what charts surveyors picked up even for five minutes and what rooms they went in," says Hurst. "We also interview the CNAs and ask if surveyors asked them anything and, if so, what they said."

The staff then meets each day after the surveyors have gone for a debriefing about what surveyors seem to be homing in on.

**Example:** Someone notices a surveyor goes in the room of a resident with a pressure ulcer every two hours, says Hurst. So the staff revisits the resident's issues: weight loss, a pressure ulcer, and heart failure. They comb through each risk and review the chart "head to toe before the surveyors come back" the next day to make sure that the chart contains everything it should. "The surveyors don't make copies of the charts until the end of the survey, which gives you time to QA the chart," says Hurst.

**Key point:** The staff "don't ever 'doctor' charts that surveyors picked up, but we make sure they are up to date," adds Hurst. For example, if staff document anything, they date it the day it's written, she adds. "We may see the physician's orders need updating, so we get that done that day," she says. Or if we see that the MDS nurse forgot to copy an intervention to the working care plan -- we add it that day."

#### Read Between the Questions

If you can pick up on where surveyors may be heading with their questions and concerns, you can provide answers and avoid citations, says **Edythe Cassel Walters, MBA, RN, NHA**, director, **LW Consulting Inc.** in Harrisburg, PA.

For example, one surveyor inquired about the facility's bowel protocols, relays **Janet Dykstra, MS, RN, CDONA/LTC**, also with **LW Consulting**. And she noticed that surveyors seemed to be asking that question because they were concerned about a resident's infrequent bowel movements.

Checking into the situation, Dykstra found the surveyors didn't have the resident's medical record data from the newly installed electronic documentation system. "The surveyors didn't have a printed hard copy, so we got that information to them and they didn't cite the facility."

**The bottom line:** "The surveyors should always have someone from the facility accompany them," says Dykstra. "Even if surveyors are sitting in a room looking at charts, someone should pop in every once in awhile and ask if they need anything or have questions."