

Long-Term Care Survey Alert

Survey Management: Head off Survey Woes at the Get-Go

Avoid these mistakes with your QA.

These three tactics can help your facility fend off F tags, including IJ citations.

1. Be careful how you document and control your quality assurance. Attorney **Joe Bianculli** reports seeing "QA committee notes with no explanation about how the agenda is put together and the follow-up for a fall, as an example." He also advises facilities to avoid "giving surveyors information without context" to help them understand it.

Cautionary example: "In one case, a facility got cited for two falls where everything under the sun tends to get cited," says Bianculli, who is in private practice in Arlington, Va. And the facility had provided surveyors "evidence in a giant file of QA material with notes and charts and all kinds of good stuff related to falls." But no-one in the facility explained the information to the surveyors,

Bianculli says. Had they done so, the surveyors "would have known that for a period of time for several months before the two residents fell, the QA committee was doing a pretty good analysis of falls in terms of when they were occurring, where, and under what circumstances. The facility had actually increased CNAs staff for a four-hour period around dinner where a lot of falls were occurring. That's pretty powerful evidence if you tell the surveyor about it."

Don't overdo it: "Facilities should also keep in mind that all you are required to produce is minutes of the QC committee to show it actually met," Bianculli says. "Some surveyors will insist on seeing more, but more frequently you see administrators produce the QA materials [voluntarily]. And once you do that, it's not privileged anymore. If you give the QA information to the surveyors, they can cite you. And, as you can imagine, the information is a roadmap to deficiencies."

2. Advise staff about talking to surveyors offsite. "There are surveyors who call nursing home employees at home -- it's done all the time," says Bianculli. He doesn't think "it's inappropriate because the surveyors are trying to trick someone into providing information as much as that the information they get from an employee outside the workplace is likely to be unreliable." And that's because staff won't be able to refer to the patient's chart during the conversation, Bianculli points out.

Remedy: "The individual staff member may tell surveyors to please meet them at the facility when they call or on their next scheduled work day," says **Lynda Mathis, RN, BS, CLNC**, lead clinical consultant for LTC Systems in Conway, Ark. "I do not encourage any staff member to meet the surveyor away from the facility as they may feel very pressured. And that may make the interview more traumatic than it should be," Mathis adds.

3. Get staff statements in writing. "Make sure to interview your staff about incidents when they occur and have staff provide a written statement," says Bianculli. He recounts a recent IJ case "where the administrator had conducted interviews after an incident but didn't have written statements. Now we are going to be at a hearing where the administrator has to relay what staff said in the interviews."