

Long-Term Care Survey Alert

SURVEY MANAGEMENT: Scrutinize Quality-of-Life Survey Guidance: F Tag Citations Are Lurking Here

Revised guidance injects new expectations into many aspects of facility life.

Times have changed in nursing homes with the growing focus on quality-of-life -- and so has the survey guidance that recently went into effect. To make sure your practices fall in line with what surveyors will target on your next inspection, follow this quick "to do" list below.

1. Revisit dignity issues (F241).

The revised survey guidance notes that to maintain dignity during dining, the facility should avoid use of bibs (also known as clothing protectors) in lieu of napkins, unless a resident requests a clothing protector. Staff should also avoid standing over residents while helping them to eat. Also make sure that staff members interact with residents rather than just with each other as they provide assistance to residents.

You can also get a citation at F241 for privacy violations. The guidance directs surveyors to look for signs containing confidential clinical or personal information (such as cognitive or continence status) posted in residents' rooms or in staff work areas visible to other residents or visitors.

Exception: You can post care information at the bedside if the resident or his responsible family member insists on it -- for example, a sign that says "do not take blood pressure in right arm." You can also display isolation precautions for publichealth protection, but make sure the sign doesn't disclose the type of infection, states the guidance. Also make sure you're not giving verbal staff reports about residents' clinical information within earshot of residents and visitors.

Remember: "Nursing home surveyors can cite a facility for failing to follow federal or state privacy laws," says attorney **Heather Berchem**, in New Haven, Conn.

2. Support residents during roommate changes. For F247 (notice for room or roommate change), CMS focuses on accommodating residents' needs related to changes in roommates or loss of a roommate to whom the resident felt attached. For example, staff should learn a resident's preferences and consider these when discussing room or roommate changes -- "and the timing of such changes," states the survey guidance.

Resident getting a new roommate? The "staff member should give the resident as much notice and information about the new person as possible, while maintaining confidentiality regarding medical information," states the guidance.

Proactive strategies: When a resident does lose a roommate, pay attention to whether he's experiencing mood and anxiety issues, advises **Sue LaBelle, RN, MSN**, a senior healthcare specialist with PointRight Inc. in Lexington, Mass. "The facility should provide necessary social services for a resident who is grieving over the death of a roommate," CMS instructs. Also consider using a tool or assessment to evaluate how well roommates in the nursing home are getting along, suggests **Nathan Lake, RN, BSN**, an MDS and longterm care expert in Seattle. "If residents are really not getting along as roommates, the facility should either try to fix it or make changes [in reassigning roommates]," advises Lake.

Heads up: The guidance at F175 (married couples) clarifies that the regulations don't prohibit a facility from accommodating residents who wish to share a room with another resident of their choice.

3. Allow residents to eat food brought by visitors. The guidance for F371 (sanitary conditions) clarifies that "the food procurement requirements for facilities are not intended to restrict resident choice.

All residents have the right to accept food brought to the facility by any visitor(s) for any resident."

Double-edged sword: Nursing homes have appreciated CMS' clarification on this issue. Yet they also have concerns about whether they or visitors could be sued if a resident develops food poisoning from eating food brought by visitors, observes **Diana Waugh, RN, BSN**, a consultant in Waterville, Ohio. Waugh predicts, however, that "as time passes without incidents," nursing home providers will "truly champion the resident's desire to enjoy 'homemade' food."