

Long-Term Care Survey Alert

SURVEY MANAGEMENT: Start The Survey On The Right Foot Mistake Pain For Dementia-Related

How to manage the entrance conference and tour.

All's well that ends well but it's important to get the survey off to a good start so surveyors will expect the best.

One of the best ways to come across as organized and in control when surveyors arrive is to have all of the documents ready that they will need to start the survey, suggests **Eleanor Alvarez**, president of **LeaderStat** in Westerville, OH. (For a list of the required items, see "Have These Documents Ready for Surveyors".) Assemble the documents in a three-ring notebook organized with tabs and binders, Alvarez advises. "Assign a department head to keep the book up to date and ready to hand to a surveyor at a moment's notice," she suggests.

Providing surveyors the paperwork up front means they don't end up on a tight schedule by having to wait around unnecessarily, agrees former Ohio survey agency chief **Kurt Haas**, now president of **Kurt P. Haas & Associates** in Lithopolis, OH. And it keeps staff from having to scurry around to collect the documents at the last minute when their full attention needs to be on the survey at hand.

Tip: It's a good idea to prepare the CMS 802 and 672 forms when you are in your survey window and revise them weekly, Alvarez suggests. "You'll be much more comfortable having this information readily available and accurate."

Also keep in mind that surveyors will look for the posted statement of deficiencies when they first enter the facility, cautions **Barbara Nodiff**, a nursing consultant with **Associated Geriatrics Information Network** in New Rochelle, NY. "And if it's not there, it's too late to put it up and the nursing facility might get a deficiency," she cautions.

Give Staff a 'Heads Up'

When surveyors arrive, let the nurse managers and charge nurses know ASAP. Some facilities use a code to let staff know surveyors are in the building, such as "code white," or they announce a certain inservice that everyone knows means "survey time."

Notifying staff that surveyors are on the premises (before they figure it out on their own) can prevent chaos that will communicate the wrong message to surveyors. "The last thing you want surveyors to see is a sense of panic among staff or nurses whispering to each other in the corner, 'The surveyors are here,'" cautions **Annaliese Impink**, associate general counsel with **Mariner Health Care** in Atlanta.

It's also a good idea for nurses to call the CNAs together and review their assignments, Nodiff suggests. "Remind the CNAs to knock on residents' doors and respond to call lights timely and check to be sure all adaptive devices are in place."

Tip: Take a moment to decompress and think through what's going to happen, Haas adds. "Recognize that everyone is anxious when a survey starts even the surveyors, who don't know what to expect."

Set the Stage

Use the entrance conference to set the parameters for the survey in a pleasant and professional way that conveys you're in charge. "This is where you lay the ground rules for how surveyors are going to be operating in your facility," Impink explains. "They have the right to access information and to tour parts of the facility, but you want that to happen under

your control and with minimal disruption to the residents." Other tasks you may want to accomplish during the conference:

1. Designate a liaison person.

"Let surveyors know you want them to have access to whatever documentation or information they need, but you prefer them to go through the designated person," Impink suggests. That way you won't have surveyors pulling nurses off the floor to get this and that, which can disrupt resident care. And you'll be better able to track what documents the surveyors have requested to see and make copies of them to prepare for the exit conference.

2. Assess surveyors' work needs in terms of space and supplies.

Identify and provide what surveyors need up front so they won't have to be going back and forth for staplers, etc.

Guarantee a Grand Tour

Surveyors conduct the initial tour to get a feel for your facility, look at residents' MDS data and begin to select their resident sample. To keep the tour on track, "make sure surveyors are accompanied by a staff member who is very knowledgeable about the condition and care needs of your residents," Alvarez advises. **Tip:** "Advise the designated staff person to be pleasant and helpful but careful to answer only the questions surveyors ask," she adds.

The staff person accompanying surveyors should explain any resident "quirks" that surveyors might misinterpret as a deficiency, such as the resident who chooses to sleep until noon or refuses hygiene care until after lunch. (One facility had to explain to surveyors that the resident greeting them in her nightcap and chain smoking on the front stoop preferred to sit out there each morning and drink her coffee and smoke as she'd always done in her own home before breakfast.)

"Make sure resident care plans address residents' individual sleeping patterns and independent schedules and anything residents do that's out of the ordinary," Nodiff urges. Staff should also report any care issues that they think surveyors could write up.

"Don't just hope that the surveyor did not see whatever occurred," Alvarez cautions. "They most likely did, but the key is how you respond to issues and fix problems that occur." A quick response to a problem has been known to prevent many a deficiency, especially for minor issues.

Surveyors will notice odors, of course, but they're usually able to distinguish between transient smells and a more chronic problem, Haas says. Don't try to "spray away" odors, Nodiff advises. "If it's normal morning hygiene time, staff should make sure to cover hampers and place soiled linens and clothing in plastic bags and then put them in hampers."

The surveyors will use the entrance tour to make rounds in the kitchen and monitor sanitation and cleanliness. "This is frequently a hectic time in the kitchen," Alvarez cautions, "so encourage your staff to practice good sanitation and infection control procedures all the time so it becomes an ingrained work habit."

Ideally, you want your staff to be proud to show the surveyors how well they perform their jobs and care for the residents, Alvarez adds.

"Surveyors will sense this feeling of accomplishment."

