

## Long-Term Care Survey Alert

### **SURVEY MANAGEMENT: Use Revised Survey Guidance To Scope Out Scope and Severity**

**Find out what CMS considers actual harm and immediate jeopardy.**

What's good for the surveyors can also be good for providers struggling to understand what surveyors count as a G-level or higher deficiency.

The guidance for all the new F tags—including the Psychosocial Outcome Severity Guide going into effect June 1--will lead surveyors to define noncompliance at multiple levels of scope and severity, says **Janet Feldkamp**, a nurse attorney in Columbus, OH.

**The bad news:** As a result, surveyors will be more comfortable in citing higher levels of noncompliance, Feldkamp predicts.

**The good news:** The guidance can help providers better understand how surveyors make decisions about the scope and severity of a deficiency, notes **Rena Shephard, RN, MHA**, president of **RRS Healthcare Consulting** in San Diego.

And forewarned is forearmed to guard against the types of scenarios that surveyors view as actual harm or worse. For example, the new Psychosocial Outcome Severity Guide suggests surveyors could hand out an immediate jeopardy citation where the facility's noncompliance with one or more requirements of participation results in the following:

- expressions (verbal and/or non-verbal) of severe, unrelenting, excruciating, and unrelieved pain; pain has become all consuming and overwhelms the resident.
- recurrent (i.e., more than isolated or fleeting) debilitating fear/anxiety that may be manifested as panic, immobilization, screaming, and/or extremely aggressive or agitated behavior(s) (e.g., trembling, cowering) in response to an identifiable situation (e.g., approach of a specific staff member).
- ongoing, persistent expression of dehumanization or humiliation in response to an identifiable situation that persists regardless of whether the precipitating event(s) has ceased and resulted in a potentially life-threatening consequence.

Editor's note: For the first in a series of articles on how to manage the revised survey interpretive guidance, see the May 2006 Long-Term Care Survey Alert.