

## **Long-Term Care Survey Alert**

## SURVEY UPDATE: What You Need To Know Now About The New Slate Of Revised F Tags

Surveyors will be ready to roll with new interpretive guidance on June 1.

If you were planning on taking a breather after implementing new F tags for pressure ulcers, urinary incontinence and the medical director's role--no such luck.

In a surprise move on March 10, the **Centers for Medicare & Medicaid Services** released F tag revisions for activities, quality assurance assessment--and the new Psychosocial Outcome Severity Guide--with a June 1 implementation date.

CMS' timeframe for releasing the revised F tags was a "little sudden as people weren't expecting them to be released until June or July," comments **Reta Underwood**, a survey consultant in Buckner, KY.

**Here's what's rolling down the survey runway:** The revised guidance for long-term care surveyors for Quality Assurance and Assessment condenses Tags F520 and F521 into one tag--F520. The tag gives surveyors more detail on how to review a facility's QA process on the annual survey. CMS has also released revised activities guidance (F248 and F249). The revision speaks to the need for facilities to use a more customized and personalized approach to activities, says Underwood.

Surveyors will use the Psychosocial Outcome Severity Guide to help "determine the severity of psychosocial outcomes resulting from the identified noncompliance at a specific F tag," according to an advance copy of the revisions.

**Beware:** Surveyors will use the guide to "determine the severity of a deficiency in any regulatory grouping (e.g., quality of care, quality of life) that resulted in a negative psychosocial outcome."

"The Psychosocial Outcome Severity Guide is an overlay for all the F tags," explains **Janet Feldkamp**, a nurse attorney with **Benesch Friedlander Coplan & Aronoff LLP** in Columbus, OH.

**Know what to expect:** "If a resident has a negative psychosocial outcome related to another F tag, facilities will receive at least a D-level deficiency, which is noncompliance," says Feldkamp.

Editor's note: Download the advance copy of the revised F tags and the Psychosocial Outcome Severity Guide at www.cms.hhs.gov/SurveyCertificationGenInfo/PMSR/list.asp#TopOfPage.