

MDS Alert

Care Quality: Brace Yourself For Focused Dementia Care Survey In Your State

Few facilities escaped the pilot surveys without deficiency citations.

As if you didn't have enough to worry about with the MDS-Focused Surveys, the **Centers for Medicare & Medicaid Services** (CMS) is expanding the Focused Dementia Care Survey. And as CMS cracks down on poor dementia care in long-term provider settings, your facility is at dire risk for citations and state agency (SA) complaint reviews. Here's what you need to know to prepare for these surveys.

Watch Out: Surveyors Look for These Red Flags

CMS recently released its findings from the Focused Dementia Care Survey Pilot, conducted in 2014. CMS's findings in its final report outline the basis for the expansion of the dementia care survey in fiscal year (FY) 2015.

Five states (California, Minnesota, New York, Illinois, and Louisiana) voluntarily participated in the pilot survey. These states conducted the initial surveys using newly developed worksheets from July 14 through Aug. 6, 2014, and then CMS reviewed the summaries of all five surveys.

Bad news: Of the facilities that state surveyors visited, few escaped without cited deficiencies, according to CMS's final report. Approximately 80 percent of surveys cited either F309 (Care of a Resident with Dementia) or F329 (Unnecessary Use of Medications), and 55 percent cited both tags. Surveyors also commonly cited other tags like F520 (Quality Assessment and Assurance) and F279 (Develop Comprehensive Care Plans).

Out of the 68 total deficiency citations in the five states, surveyors cited four deficiencies at a "G" or harm level (three in California and one in Illinois). But some survey teams struggled with linking medication use to actual harm outcomes in residents with dementia, especially psychosocial harm.

Don't Expect Any Objections from SAs

After analyzing the data and getting feedback from surveyors, CMS said that states gave the pilot a big thumbs-up. Here are some of the points that state surveyors made when CMS asked for feedback:

- Many state surveyors noted learning needs related to enforcement (including scope and severity), basic dementia care practices, and prescribing practices.
- Compared to the standard annual or complaint surveys, the pilot survey was time-intensive but yielded valuable information that helped surveyors to better identify and cite deficient practices.
- Surveyors feel there is a need for a more detailed and focused survey to identify and cite deficient dementia care and psychoactive medication prescribing practices.
- Some opportunities exist to shorten the current focused survey worksheets and process without affecting efficiency.
- Most surveyors said that CMS should integrate a more detailed evaluation of dementia care practices into the annual survey process, but most also suggested that the focused survey should remain as a stand-alone survey conducted at the discretion of the SA or CMS.

Beware: Some surveyors who participated in the pilot also said that they identified deficient dementia care and related

prescribing practices just a few weeks after a standard survey team had visited the facility and had not cited dementia care-related deficiencies.

Your State Could Conduct Surveys, Too

After the pilot, CMS revised the dementia care-focused survey process and plans to apply the revised version in both Traditional and Quality Indicator Survey (QIS) states, as well as in complaint surveys in several states, to determine if this is effective in integrating a focus on dementia care into SA activities.

Now that CMS is finished analyzing the pilot outcomes, it's expanding the survey efforts nationwide. This means that your state can volunteer to conduct Focused Dementia Care Surveys in FY 2015.

And the expansion project will produce even more scrutiny of your dementia care practices – state surveyors will launch a more intensive, targeted effort to improve effectiveness in citing poor dementia care and overutilization of antipsychotic medications.

Additionally, CMS has launched a comprehensive survey effort in Texas, and plans to expand to additional states. The Texas SA will conduct focused reviews in selected geographic areas.

Warning: Even though states conducting the surveys will do so on a voluntary basis, you will still be at risk for citations as a result of the surveys. Also, if surveyors note additional care concerns during on-site reviews, they could refer those concerns to the SA as a complaint for further review.

Link: To access the final report, go to

www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-15-31.pdf.