

MDS Alert

Compliance: Get the Skinny On Foot Care

Though F687 Foot Care has been a citation in effect since November 2017, it's worth digging into the nitty gritty to make sure your facility is in compliance. With Medicare reimbursing podiatrists directly - and foot health being such a crucial component of mobility and health that is prone to complications - it's easy to get confused by what your facility is responsible for and what you need to leave to the foot experts.

Appendix PP clarifies how the citation exists to help prevent or circumvent foot issues that may develop as secondary disease processes. Facilities are not only responsible for routine grooming care that is also preventative in nature - but also for facilitating expert care when needed, including transportation.

Prioritize Routine Care for Healthy Patients

By ensuring that foot care provided, your facility is meeting professional standards of practice. Foot care includes treatment to prevent complications from conditions such as diabetes, peripheral vascular disease, or immobility. It also includes assisting the resident in making necessary appointments with qualified healthcare providers, such as podiatrists, and arranging transportation to and from appointments.

"The Guidance clarifies that treatment includes preventive care being provided so that podiatric complications can be avoided in residents who have complex medical conditions such as those noted above, as they are more prone to developing foot problems," says Linda Elizaitis, RN, RAC-CT, BS, CIC, president of CMS Compliance Group in Melville, New York.

"The Guidance reinforces that toe nail clipping for those residents without complicating diseases should be provided by staff who have been educated and trained in providing this service," she says.

However, make sure you evaluate residents carefully; anyone who already has any kind of condition that affects the feet, including the toenails, needs to be seen by a professional.

"Residents who have complicating conditions need to have a referral to a qualified professional for toe nail clipping. A podiatrist, a doctor of medicine (MD), and a doctor of osteopathy (DO) are all qualified professionals who can treat foot problems/disorders. A facility needs to ensure that qualified professionals are involved in meeting the foot care needs of all residents," Elizaitis says.

Know Who's Qualified to Treat Which Conditions

If you aren't sure what qualifies as a complicating condition or what credentials a professional needs to provide adequate care for more complex foot disease processes, Appendix PP provides some examples and guidance.

Note: Though a callus may seem like a routine occurrence for younger, healthy, mobile people, Appendix PP includes it in its nonexclusive list of conditions that may need professional treatment.

"Foot disorders which may require treatment include, but are not limited to: corns, neuromas, calluses, hallux valgus (bunions), digiti flexus (hammertoe), heel spurs, and nail disorders," Appendix PP says.

Surveyors Looking for Signs, Documentation

Surveyors won't be removing the socks of every resident in your care, but for residents who are selected for review, surveyors are looking for consistency in the medical record compared to a resident's presentation.

Here's exactly where surveyors are instructed to focus:

- "According to the medical record, does the resident have a diagnosis or condition that poses a risk to foot health (e.g., diabetes, peripheral vascular disease, ingrown toenails)?"
- "Does the comprehensive care plan adequately address the resident's risk with appropriate interventions?"
- "Observe resident's feet for lack of nail care, presence of calluses, and/or other foot problems."
- "Are residents with foot concerns seen either within the facility or community by a qualified foot care specialist? Do residents with mobility concerns have foot care concerns, and did the facility address these concerns?"
- "Are qualified healthcare providers available to see residents either in the facility or in the community?"
- "What preventive foot care do staff provide and to what resident population?"
- "Are staff performing foot care to the resident when needed and ordered?"

Beyond having the appropriate and comprehensive documentation for each resident in the clinical record, make sure you have all instances of appointments and any further care recorded. Surveyors are looking to make sure that care is consistent, thorough, and patient-centered - and extends throughout all levels of care, from mobility in therapy to treatment by the facility or by other credentialed experts.

Ultimately, your facility should focus on maintaining health and mobility in residents, and proper, routine foot care can go a long way in preventing decline.

"Remember that any condition that affects foot health may, and usually does, impact mobility. A decrease in mobility is not a complication that you want, especially if it is related to not having an appropriate preventive plan of care in place to maintain foot health," Elizaitis says.