

## MDS Alert

### Compliance: Know These Nutrition Services Ftags

**Brush up on these Nutrition Services requirements or risk surveyors' citations.**

#### **Look at Your Facility's Food 'Systems'**

F800 (Provided Diet Meets Needs of Each Resident) is a Nutrition Services regulation.

"This regulation requires that facilities provide 'each resident with a nourishing, palatable, well-balanced diet' that meets the resident's daily nutritional needs, special dietary needs, and in alignment with the person-centered focus of the updated Requirements of Participation, takes into consideration each resident's preference," says **Linda Elizaitis**, president of **CMS Compliance Group Inc.** in Melville, New York, on the CMS Compliance Group blog.

With person-centered care becoming a central part of long-term care, don't forget to look to nutrition and dining as a place to bring more individualized choice and care to your residents and facility. Surveyors are listing nutrition services-related citations under the Long Term Care Survey Process, and some of those point to deficiencies.

"Common issues cited include residents who dine in their rooms not being provided with information related to alternate meal options, as well as identified food preferences not being addressed. The Interpretive Guidance (IG) states that reasonable efforts to accommodate the residents' choices and preferences must be made by the facility, as this helps ensure that residents are offered meaningful choices for their meals/diets that are satisfying to the residents as well as nutritionally adequate. The regulation expects ongoing communication and coordination between all departments and staff to ensure that residents' nutritional and dietary needs are met according to the individual resident's assessment and care plan, and that the plan of care must also include the resident's choices," Elizaitis says.

"This relatively brief regulation packs some wallop though!" she adds. "It concludes by directing the surveyors to cite this tag if there are 'overall systems issues' identified regarding how the facility manages and executes its food and nutrition services. You need to follow-up on all resident identified food concerns and always monitor your food/nutritional services systems."

#### **Ask Residents about Meal Timing and Snacks**

F809 (Frequency of Meals/Snacks at Bedtime) is another Nutrition Services regulation.

The basic requirements of this regulation have stayed the same, Elizaitis says, but more emphasis has been placed on resident choice. Besides three meals a day, served at regular times per the community's norms, with no more than 14 hours passing between any meal, facilities must accommodate resident "needs, preferences, requests, and plan of care."

"What's new, however, is the requirement that 'suitable, nourishing alternative meals and snacks,' - meals/snacks that are of similar nutritive value as the meal/snack that is offered during normally scheduled meals and consistent with the resident's plan of care - must be provided to residents who prefer to eat at nontraditional times or outside of scheduled meal times, so long as this is consistent with the care plan," Elizaitis says.

Note that this doesn't mean your facility needs to emulate a college campus dining hall. "The IG notes that this does not mean nursing facilities have to provide food service 24 hours per day and that it is acceptable to prepare suitable alternatives in advance that can be 'appropriately served by appropriately trained facility staff' at nontraditional times," Elizaitis says.

You can expect that surveyors will be interviewing residents about whether their meal schedule reflects their individual needs, and whether facilities accept any input, she adds.

"Let's remember what also leads to survey concerns being identified on interview related to snacks; residents can be asked if they are offered snacks at bedtime and if a snack is not offered, would they want one. What do you think that answer is most likely to be?" she asks.