

## MDS Alert

### Survey Management: Find Out What Surveyors Might Cite As Pain-Related Actual Harm Or IJ

**Make sure these examples don't occur in your facility.**

The new Psychosocial Severity Outcome Guide provides a roadmap to survey deficiencies for pain.

**Beware:** Surveyors may write you up for anything from a level 2 to a level 4 deficiency if they find residents have a negative psychosocial response to a deficient pain management program. Check out these examples of what surveyors might be looking for.

Level 2 (No actual harm with potential for more than minimal harm that isn't immediate jeopardy)

**Example:** "Feelings and/or complaints of discomfort or moderate pain. The resident may be irritable and/or express discomfort."

Level 3 (Actual harm that is not IJ)

**Example:** "Expressions (verbal and/or non-verbal) of persistent pain or physical distress (e.g., itching, thirst) that has compromised the resident's functioning such as diminished level of participation in social interactions and/or ADLs, intermittent crying and moaning, weight loss and/or diminished appetite. Pain or physical distress has become a central focus of the resident's attention, but it is not all-consuming or overwhelming (as in Severity Level 4)."

Level 4: Severity Level 4 (Immediate jeopardy to resident health or safety)

**Example:** "Expressions (verbal and/or non-verbal) of severe, unrelenting, excruciating, and unrelieved pain; pain has become all-consuming and overwhelms the resident."

**Quality assurance audit tip:** Surveyors will be likely to cite your facility when they can't find a pain assessment at all for a resident complaining of pain--or they find the pain assessment to be "grossly inconsistent" with other information in the resident's medical record, cautions **Joseph Bianculli**, an attorney in private practice in Arlington, VA. The latter would include discrepancies between the pain assessment and "nursing notes about pain or orders for narcotic pain relievers," he says. Also watch out for "reports of unrelieved pain where there's no evidence of follow-up," he says.