

MDS Alert

Watch Out For These New F-Tags

Prepare for the upcoming new facility assessment rules.

Have you checked out the newest Ftags before the new survey process goes into effect this month? Make sure your facility is prepared to address any deficiencies before the new facility assessment goes into effect. Some Ftags are completely new, and some are updated versions of familiar Ftags.

F557 Respect, Dignity/ Right to have Personal Property is the new F252 Safe/Clean/Comfortable/Homelike Environment, says **Linda Elizaitis**, president and CEO of **CMSCompliance Group** in Melville, New York.

The patient-focused renaming of this care-focused Ftag is telling of the sea change CMS is hoping to effect. CMS has reframed this Ftag in a way that focuses on the resident and his or her belongings, bringing attention to the fact that the residents' rights extend beyond physical safety and cleanliness, into other aspects of their life and care. Crucially, this is one of the Ftags that qualify as substandard quality of care, so keep an eye out to make sure you're meeting the requirements.

F557 Respect, Dignity/ Right to have Personal Property

- The resident has a right to be treated with respect and dignity, including:
 - The right to retain and use personal possessions, including furnishings, and clothing, as space permits, unless to do so would infringe upon the rights or health and safety of other residents.

F574 Required notices and Contact information is the new F156, and expands upon the information that residents have a right to receive and have on hand, Elizaitis says. The updated information required for residents includes:

- Information and contact methods for:
 - State survey agency
 - State long-term care ombudsman (see MDS Alert Volume 15 Number 11 page 116 for more information on state ombudsman programs)
 - State protection and advocacy system
- Information regarding Medicare/Medicaid eligibility and coverage
- Contact information for Aging and Disability Resource Center or other No Wrong Door Program
- Contact information for Medicaid Fraud Control Unit
- Information and contact info for filing grievances or complaints concerning any suspected violations of state/federal regulations

One of the trickier things about this particular Ftag update is the means in which surveyors will assess your facility's compliance. "Just remember that resident and resident representative interviews will be conducted during survey to determine how these notices and contact information are communicated and if the information was understood," Elizaitis says.

When evaluating your systems and protocols for communicating this information to residents, make sure you consider the spectrum of your residents' abilities. "This means you need to have systems in place to communicate this information verbally, in writing (including Braille) and in a language that the resident/representative can clearly understand," she says.

This means you can be dinged by a surveyor if you fail to use an interpreter when communicating this information to someone whose primary language is not spoken English-including residents whose first language is American Sign Language.

"The bottom line for this regulation is that the notice and contact information needs to be presented in a manner that can be clearly comprehended by the individual resident/representative. If you are not sure that you have current contact information, review and update your information now," Elizaitis says.

Pay attention to the new **F758 Free from Unnecessary Psychotropic Meds/PRn use**, which replaces and expands upon F329 Unnecessary Drugs F329 has been one of the most frequently cited deficiencies across the country, Elizaitis says, and the added nuances of the updated F758 make it a tag to watch out for as Phase 2 goes into effect.

Among other information, F758 states:

- Residents who have not used psychotropic drugs should not be given these drugs unless medication is necessary to treat a specific condition as diagnosed and documented in the clinical record; »
- Residents who use psychotropic drugs should receive GDRs and behavioral interventions, unless clinically contraindicated, in an effort to discontinue use.

With the new item updates to Section N involving antipsychotic GDR programs, surveyors will be on the look out to make sure facilities are accurately and comprehensively documenting antipsychotic and opioid use.