CONTENTS

Note from the author ........................................................................................................ ix
About the author ............................................................................................................. xi

Chapter 1: The survey process .................................................................................. 1
  Who conducts surveys? ............................................................................................... 1
  Size of the survey team ........................................................................................... 1
  Types of surveys ....................................................................................................... 2
  Frequency of surveys ............................................................................................... 4
  Understand tier levels ............................................................................................. 5
  Deciphering the State Operations Manual .............................................................. 5
  Survey processes ..................................................................................................... 6

Chapter 2: Intermediate survey sanctions ............................................................... 9
  CMS goals/expectations for sanctions ...................................................................... 9
  Sanctions for agencies with deemed status ............................................................ 10
  What is a branch? .................................................................................................... 10
  What factors are considered in determining sanctions? ......................................... 11
  Action taken when immediate jeopardy is found ................................................... 12
  When condition-level citations are non-IJ situations .............................................. 12
  Informal dispute resolution (§488.745) .................................................................. 12
  Repeat deficiency .................................................................................................... 14
  Sanction No. 1: Temporary managers (§488.835) ................................................ 14
  Sanction No. 2: Payment suspension for new admissions (§488.840) ............... 16
  Sanction No. 3: Civil money penalties .................................................................. 17
  Sanction No. 4: Directed plan of correction ............................................................ 20
  Sanction No. 5: Directed in-service training ............................................................ 20
  Summary .................................................................................................................. 21
Chapter 3: Immediate jeopardy .................................................................23

- Principles .......................................................................................... 24
- Recognizing immediate jeopardy .......................................................... 24
- What are the consequences? ................................................................ 24
- Triggers for immediate jeopardy ............................................................ 25
- Current CoPs that hold risk for immediate jeopardy ......................... 25
- Adverse medication consequences ....................................................... 26
- Immediate jeopardy example ............................................................... 26
- Drug regimen review ............................................................................ 27
- Failure to prevent neglect .................................................................... 27
- Nutrition and hydration ...................................................................... 27
- Infection control .................................................................................. 28
- Stabilize condition ............................................................................... 28
- Emergency preparedness .................................................................... 28
- How to mitigate risk ............................................................................ 29
- Things you can do to put your agency a step ahead ............................ 30
- What to do about neglect, abuse or other violence ......................... 30

Chapter 4: What to expect from your surveyor ...........................................33

- Task 1: Pre-survey prep ................................................................. 33
- Task 2: Entrance interview ............................................................... 35
- Task 3: Information gathering ........................................................... 36
- Home visits ......................................................................................... 37
- Task 4: Information analysis ............................................................... 39
- Task 5: Exit conference .................................................................... 39
- Task 6: Statement of deficiencies ...................................................... 40

Chapter 5: Staff interviews with surveyors .................................................43

- Entrance interview ............................................................................ 43
- Clinical manager/supervisor interview ................................................ 49
- Interview with the case manager and clinical staff ......................... 52
- Home visit probes ............................................................................ 53
| Chapter 6: Clinical record review ............................................................... 57 |
| Number of records surveyors will request (by patient census size) .................. 57 |
| Record review guidelines: Tips for success ................................................ 57 |
| Chapter 7: Top survey targets .................................................................... 63 |
| Most common survey deficiencies .............................................................. 63 |
| CMS posts home health complaint survey results ........................................ 65 |
| Recent changes to CoPs ............................................................................. 65 |
| Conduct an objective assessment of your preparedness ............................... 67 |
| Repeat standard-level deficiencies could prove costly .................................... 68 |
| How penalties will be determined .................................................................. 68 |
| Ways to avoid repeat survey deficiencies .................................................... 68 |
| Consequences of deficiencies are severe ...................................................... 69 |
| Chapter 8: Target Planning, coordination & quality of care ...................... 71 |
| Care planning a top condition-level deficiency ............................................ 71 |
| Address care coordination challenges ......................................................... 72 |
| Ensure plan of care has necessary elements ............................................... 72 |
| What else must be in the clinical record? ...................................................... 73 |
| What must the plan of care include? ............................................................ 73 |
| Ensure you include the following on patients’ plans of care ......................... 74 |
| How should the plan of care be updated? ..................................................... 74 |
| Split treatment goals into smaller, discrete actions ....................................... 75 |
| Make sure patients create own goals ............................................................ 75 |
| Ensure patients’ plans of care are individualized ........................................ 76 |
| Components of a successful discharge ......................................................... 77 |
| Act properly to discharge patients with cause ............................................. 78 |
| Guidelines define disruptive, abusive behavior .......................................... 79 |
| Improve your agency’s case conferences .................................................... 79 |
| Respond quickly to missed visits ................................................................. 81 |
| Fix your agency’s visit frequency issues ...................................................... 81 |
| Remote patient monitoring a growing concern .......................................... 82 |
| Survey results reveal patient rights as target area ....................................... 83 |
| Medication management/reconciliation ...................................................... 84 |
## Chapter 9: Target QAPI

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>How to track QAPI data</td>
<td>87</td>
</tr>
<tr>
<td>Address this frequent survey target</td>
<td>88</td>
</tr>
<tr>
<td>QAPI CoPs are organized into five standards</td>
<td>88</td>
</tr>
<tr>
<td>QAPI programs must be ongoing, driven by data</td>
<td>89</td>
</tr>
<tr>
<td>What do agencies need to track?</td>
<td>89</td>
</tr>
<tr>
<td>Get ideas for where to focus your QAPI efforts</td>
<td>90</td>
</tr>
<tr>
<td>Three steps to set up a sound program</td>
<td>90</td>
</tr>
<tr>
<td>Key reports to analyze</td>
<td>92</td>
</tr>
<tr>
<td>Data analysis a key skill for quality managers</td>
<td>93</td>
</tr>
<tr>
<td>Involve employees in heading up QAPI projects</td>
<td>95</td>
</tr>
<tr>
<td>Tips to practice shared governance</td>
<td>95</td>
</tr>
<tr>
<td>Home Health QAPI Self Assessment Tool</td>
<td>96</td>
</tr>
</tbody>
</table>

## Chapter 10: QAPI suggestions

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency finds success with falls QAPI project</td>
<td>103</td>
</tr>
<tr>
<td>Use data to drive agency efforts</td>
<td>103</td>
</tr>
<tr>
<td>Additional strategies to reduce falls</td>
<td>104</td>
</tr>
<tr>
<td>Ways to assess your patients for fall risks</td>
<td>104</td>
</tr>
<tr>
<td>How to analyze fall risk</td>
<td>105</td>
</tr>
<tr>
<td>Five key tips to help prevent patients from falling</td>
<td>105</td>
</tr>
<tr>
<td>Agency shares tips for readmissions</td>
<td>106</td>
</tr>
<tr>
<td>Ways one agency improved on hospitalization</td>
<td>107</td>
</tr>
<tr>
<td>Key areas of focus for agencies</td>
<td>108</td>
</tr>
<tr>
<td>Take steps to reduce hospitalizations</td>
<td>108</td>
</tr>
<tr>
<td>Ways to reduce overall rehospitalization rates</td>
<td>109</td>
</tr>
<tr>
<td>Use technology, data to reduce readmissions</td>
<td>110</td>
</tr>
<tr>
<td>Pain interfering with activity</td>
<td>110</td>
</tr>
<tr>
<td>Specialists can guide your wound QAPI project</td>
<td>111</td>
</tr>
<tr>
<td>Ways to improve your wound outcomes</td>
<td>112</td>
</tr>
<tr>
<td>Measure wounds with accuracy, consistency</td>
<td>113</td>
</tr>
<tr>
<td>Compare SOC and discharge OASIS</td>
<td>114</td>
</tr>
<tr>
<td>How to improve patient’s dyspnea?</td>
<td>115</td>
</tr>
<tr>
<td>Multidisciplinary team collaboration</td>
<td>115</td>
</tr>
</tbody>
</table>
Case manage respiratory conditions ................................................................. 116
Jog respiratory patients’ memories, improve outcomes .................................... 117
Agencies identify HHCAHPS as top QAPI project ............................................. 117
Agency conducts customer service calls ............................................................. 118
Tips to improve on HHCAHPS ........................................................................ 118

Chapter 11: Target Emergency preparedness .................................................. 131
Prepare for emergency plan surveys ................................................................. 132
Guidelines show what surveyors will focus efforts on ........................................ 132
Learn home health survey guidance ................................................................. 133
Other important preparedness updates ............................................................. 134
CMS updates training exercise/exception guidance ............................................ 135
Develop individualized emergency plans .......................................................... 136
Emergency prep tips — regardless of the emergency ........................................ 138
Screening tool helps define patient risk in emergencies ..................................... 139
Rank your agency’s patients in order of priority ............................................... 139
Make sure to sign up for GETS ........................................................................ 140
Prepare your agency for a grid outage ............................................................... 141
How to prepare for a massive snowstorm ......................................................... 141
Protect your agency’s workers from cold weather ............................................. 142
Remind clinicians to stock their cars during snowstorms ................................... 142
A hurricane forecasted? Don’t procrastinate ....................................................... 143
Add active shooter preparations to disaster plans .......................................... 144
Be aware of cybersecurity obligations in the CoPs .......................................... 145
Expert answers emergency preparedness questions ........................................ 148
Perform a risk assessment — or risk citations ................................................... 149

Chapter 12: Target Infection control ............................................................... 155
Survey guidance on infection control ............................................................... 155
Follow standard infection control precautions ............................................... 157
Use CDC as your guide for infection control requirement ............................... 158
Tips for infection control survey prep ............................................................... 158
Prepare for an infection control survey ............................................................. 159
Focus on exception policies ............................................................................ 160
Vaccine surveys: Where’s the list? ................................................................... 160
Contents

Include contingency plan in your policy ................................................................. 161
Surveyors share mandate checklist .................................................................... 161
Note differences in medical exemptions ............................................................... 162
Remote staff exceptions should be rare ............................................................... 163
Make sure contractors are vaccinated ................................................................. 163
Other mandate clarifications from CMS ............................................................. 164
Educate your agency’s staff about infection control ........................................... 164
Survey concerns around infection control ......................................................... 164
Actions to show infection control improvements .............................................. 165
Create an infection manager role ....................................................................... 166
Track infection control data the right way ......................................................... 166
Agencies share how they track infection control data ........................................ 167
Handwashing ....................................................................................................... 167
Agencies must ensure nurses keep clean nursing bags ..................................... 169
Bloodborne pathogens ....................................................................................... 170
UTIs .................................................................................................................... 171
Bedbugs ............................................................................................................. 171

Chapter 13: Tips and tools for survey success .............................................. 177

Achieve compliance ............................................................................................ 177
Prepare for upcoming surveys ........................................................................... 177
Standards within the CoPs ............................................................................... 179
Collect information in binders ........................................................................ 182
Review OBQI Risk-Adjusted Outcome Report .................................................. 184
Electronic record retrieval survey preparation checklist ................................ 184
Entrance interview ............................................................................................. 186
Interview ............................................................................................................ 188
Record Review Guidelines ................................................................................ 189
Home visit probes ............................................................................................ 190
Interviewing the patient/caregiver ................................................................. 191
Definitions and acronyms ................................................................................ 193
Related resources ............................................................................................. 195