

# CONTENTS

- Note from the author ..... ix**
- About the author ..... xi**
- Chapter 1: Post-Pandemic Survey Success ..... 1**
  - Update infection control policies amid shifting CDC protocols..... 1
  - Waiver: Aide supervision and training ..... 2
  - Update infection control polices ..... 4
  - Expand QAPI beyond infection control efforts post-PHE..... 5
  - Home Health Aide Supervision ..... 5
  - Occupational therapists conducting initial visits ..... 7
- Chapter 2: The survey process ..... 9**
  - Who conducts surveys? ..... 9
  - Size of the survey team ..... 9
  - Types of surveys..... 10
  - Frequency of surveys..... 12
  - Understand tier levels ..... 13
  - Deciphering the State Operations Manual..... 13
  - Survey processes ..... 14
- Chapter 3: Intermediate survey sanctions ..... 17**
  - CMS goals/expectations for sanctions ..... 17
  - Sanctions for agencies with deemed status..... 18
  - What is a branch?..... 18
  - What factors are considered in determining sanctions? ..... 19
  - Action taken when immediate jeopardy is found ..... 20
  - When condition-level citations are non-IJ situations ..... 20
  - Informal dispute resolution (§488.745) ..... 20
  - Repeat deficiency ..... 22

Sanction No. 1: Temporary managers (§488.835).....	22
Sanction No. 2: Payment suspension for new admissions (§488.840) .....	24
Sanction No. 3: Civil money penalties.....	25
Sanction No. 4: Directed plan of correction.....	28
Sanction No. 5: Directed in-service training.....	28
Summary .....	29
Guide to survey process.....	32
<b>Chapter 4: Immediate jeopardy .....</b>	<b>31</b>
Principles .....	32
Recognizing immediate jeopardy .....	32
What are the consequences? .....	32
Triggers for immediate jeopardy .....	33
Current CoPs that hold risk for immediate jeopardy .....	33
Adverse medication consequences.....	34
Immediate jeopardy example .....	34
Drug regimen review .....	35
Failure to prevent neglect.....	35
Nutrition and hydration .....	35
Infection control .....	36
Stabilize condition .....	36
Emergency preparedness.....	36
How to mitigate risk.....	37
Things you can do to put your agency a step ahead:.....	38
What to do about neglect, abuse or other violence.....	38
<b>Chapter 5: What to expect from your surveyor .....</b>	<b>41</b>
Task 1: Pre-survey prep .....	41
Task 2: Entrance interview.....	43
Task 3: Information gathering.....	44
Home visits .....	45
Task 4: Information analysis.....	47
Task 5: Exit conference.....	47
Task 6: Statement of deficiencies.....	48
<b>Chapter 6: Staff interviews with surveyors .....</b>	<b>51</b>
Entrance interview.....	51
Clinical manager/supervisor interview .....	57

Interview with the case manager and clinical staff.....	60
Home visit probes.....	61
<b>Chapter 7: Clinical record review .....</b>	<b>65</b>
<b>Chapter 8: Top survey targets .....</b>	<b>71</b>
Most common survey deficiencies .....	71
Survey citations for remote monitoring are rising.....	73
Joint Commission shares most challenging survey requirements.....	74
CMS posts home health complaint survey results.....	75
Conduct an objective assessment of your preparedness .....	76
Repeat standard-level deficiencies could prove costly.....	76
How penalties will be determined.....	77
Ways to avoid repeat survey deficiencies.....	77
Consequences of deficiencies are severe .....	77
<b>Chapter 9: Target Planning, Coordination &amp; Quality of Care .....</b>	<b>79</b>
Care planning a top condition-level deficiency .....	79
Address care coordination challenges .....	80
Ensure plan of care has necessary elements.....	80
What else must be in the clinical record? .....	80
What must the plan of care include? .....	81
Ensure you include the following on patients' plans of care.....	82
How should the plan of care be updated?.....	82
Tips for goal planning success .....	83
Ensure patients' plans of care are individualized.....	83
Create comprehensive discharge policies .....	84
Components of a successful discharge .....	85
Guidelines define disruptive, abusive behavior .....	86
Act properly to discharge patients with cause.....	86
Prove the transfer summary was sent timely .....	87
Improve your agency's outcomes with case conferences .....	88
Respond quickly to missed visits.....	90
Fix your agency's visit frequency issues .....	90
Survey results reveal patient rights as target area .....	91
Medication management/reconciliation .....	92

<b>Chapter 10: Target QAPI .....</b>	<b>95</b>
Survey citations for QAPI deficiencies .....	95
Demonstrate your governing body’s oversight.....	96
Ensure your governing body is up to par with CoP requirements .....	97
How to track QAPI data .....	99
Address this frequent survey target.....	99
QAPI CoPs are organized into five standards .....	100
QAPI programs must be ongoing, driven by data .....	100
What do agencies need to track? .....	101
Get ideas for where to focus your QAPI efforts .....	101
Three steps to set up a sound program .....	102
Key reports to analyze .....	103
More tips to comply with the QAPI CoP .....	104
Data analysis a key skill for quality managers.....	105
Involve employees in heading up QAPI projects .....	106
Tips to practice shared governance .....	106
Home Health QAPI Self Assessment Tool.....	107
<b>Chapter 11: QAPI suggestions .....</b>	<b>115</b>
Agency finds success with falls QAPI project.....	115
Use data to drive agency efforts.....	115
Additional strategies to reduce falls.....	116
Ways to assess your patients for fall risks .....	116
How to analyze fall risk.....	117
Five key tips to help prevent patients from falling .....	117
Agency shares tips for readmissions .....	118
Ways one agency improved on hospitalization .....	119
Key areas of focus for agencies .....	120
Take steps to reduce hospitalizations .....	120
Ways to reduce overall rehospitalization rates.....	121
Use technology, data to reduce readmissions .....	122
Pain interfering with activity.....	122
Specialists can guide your wound QAPI project.....	123
Ways to improve your wound outcomes.....	124
Measure wounds with accuracy, consistency .....	125
Compare SOC and discharge OASIS .....	126
How to improve patient’s dyspnea? .....	127

Multidisciplinary team collaboration .....	127
Case manage respiratory conditions.....	128
Jog respiratory patients' memories, improve outcomes .....	129
Agencies identify HHCAHPS as top QAPI project.....	129
Agency conducts customer service calls .....	130
Tips to improve on HHCAHPS.....	130
Tools .....	131
High-risk hospitalization protocol .....	131
Hospitalization prevention tool .....	133
Home health agency process of care investigation.....	135
Emergency/education plan for heart failure.....	137
Heart failure program readmission worksheet .....	138
Patient/caregiver interview .....	139
Preventing pneumonia at home .....	142
My plan for preventing pneumonia at home.....	142
<b>Chapter 12: Target Emergency Preparedness.....</b>	<b>143</b>
Prepare for emergency plan surveys .....	144
Guidelines show what surveyors will focus efforts on .....	144
Learn home health survey guidance .....	145
Other important preparedness updates .....	146
CMS updates training exercise/exception guidance.....	147
Develop individualized emergency plans.....	148
Emergency prep tips — regardless of the emergency.....	150
Screening tool helps define patient risk in emergencies .....	151
Rank your agency's patients in order of priority .....	151
Make sure to sign up for GETS.....	152
Prepare your agency for a grid outage.....	153
How to prepare for a massive snowstorm.....	153
Protect your agency's workers from cold weather.....	154
Remind clinicians to stock their cars during snowstorms .....	154
A hurricane forecasted? Don't procrastinate .....	155
Add active shooter preparations to disaster plans .....	156
Be aware of cybersecurity obligations in the CoPs.....	157
Expert answers emergency preparedness questions.....	160

Tools .....	162
Perform a risk assessment — or risk citations .....	162
Hazard vulnerability assessment tool .....	164
<b>Chapter 13: Target Infection control .....</b>	<b>167</b>
Survey guidance on infection control .....	167
Follow standard infection control precautions .....	169
Use CDC as your guide for infection control requirement .....	170
Tips for infection control survey prep .....	170
Prepare for an infection control survey .....	171
Educate your agency’s staff about infection control .....	171
Survey concerns around infection control .....	171
Actions to show infection control improvements .....	172
Create an infection manager role .....	173
Track infection control data the right way .....	173
Agencies share how they track infection control data .....	174
Handwashing .....	174
Agencies must ensure nurses keep clean nursing bags .....	176
Bloodborne pathogens .....	177
UTIs .....	178
Bedbugs .....	178
<b>Chapter 14: Tips and tools for survey success .....</b>	<b>183</b>
Achieve compliance .....	183
Prepare for upcoming surveys .....	183
Standards within the CoPs .....	185
Collect information in binders .....	188
Keep up with monkeypox guidance under new PHE, survey warning .....	190
Review OBQI Risk-Adjusted Outcome Report .....	190
Electronic record retrieval survey preparation checklist .....	191
Entrance interview .....	193
Interview .....	194
Record Review Guidelines .....	196
Home visit probes .....	197
Interviewing the patient/caregiver .....	198
Definitions and acronyms .....	200
Related resources .....	202