

FYI -- Updates



Aim For Success

Date: August 2005

Use of Nurse Practitioners

I have a client who is considering employing a nurse practitioner who will then establish a relationship with one of the attending physicians at the nursing home. The NP would be an employee of the nursing home. She is looking to talk to someone who has a similar arrangement. If you have such an arrangement and would be willing to share your experiences with her, please let me know.

Revised UAI Manual – download a copy from <http://www.dss.virginia.gov/form/index.html> or contact Gail Nardi at gail.nardi@dss.virginia.gov or 804-726-7537.

Survey Focus -- "Making Sense of Data." On March 18th, CMS provided training to surveyors that focused on how surveyors should use information collected during the survey to determine compliance with requirements of participation. A copy of the Web training provided to surveyors may be found at www.cms.internetstreaming.com

On March 10th, CMS sent out a letter to all state survey agencies that included the following language:

"There are instances in which a deficient practice creates noncompliance with more than one regulation. In those situations, noncompliance with each requirement should be cited. This situation may be referred to as "independent but associated" citations. This guidance applies to all provider types."

In reality, this means that in the past you may have been cited for the primary deficiency but in today's word you will be cited for all associated deficiencies. Trends that we have observed across the state in the past year consistently demonstrate citation of more deficiencies and at a higher scope/serverity. The letter goes on to discuss concerns, including:

"We have heard from some providers that citation of more than one deficiency for a single type of negative outcome simply represents "piling it on" by states or CMS. The regulations do not support this view. Nor do we agree as a matter of proper management and practice. Often one citation will focus on or manifest cause for a poor outcome, while another citation may focus on a systemic or root cause. It is vital that health care providers address all factors that contribute to negative outcomes."

Life Safety Code Clarifications

On 7/14/05, CMS sent a letter to the State Survey Agencies providing clarification to some life safety code questions. This letter may be found at <http://www.cms.hhs.gov/medicaid/survey-cert/letters.asp> [it is listed as publication #38] although the letter is titled S&C 05-38.

