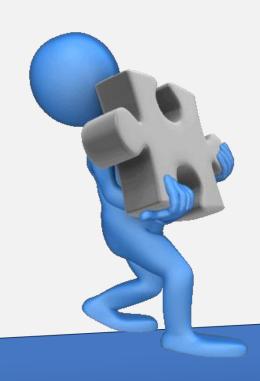
CAHF ORANGE COUNTY & LONG BEACH CHAPTERS EDUCATION EVENT

APRIL 16, 2025 LONG BEACH, CA



Piecing Together The Resident Assessment Puzzle

DELIVERABLES:



- Discuss similarities between Puzzle & Resident Assessment
- Enumerate Benefits of Accurate Resident Assessment
- List Implications of Wrong/Incomplete Resident Assessment
- Explore Consequences of Inaccurate/Incomplete Resident Assessment
 - Explain possible RCA of poor resident assessment
 - Elaborate Key Consideration to Have an Accurate Resident Assessment

Revised LTC Surveyor Guidance

Admission, Transfer & Discharge

Chemical Restraints/Unnecessary Psychotropic Med

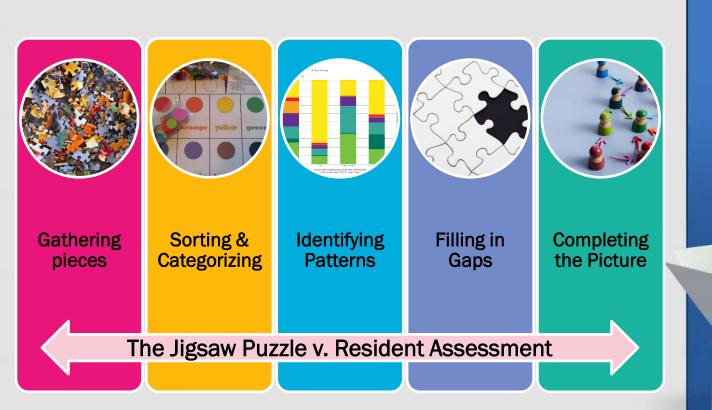
RESIDENT ASSESSMENT

Quality of Life & Quality of Care

Administration

QAPI

ΙP



Accurate & Complete Resident Assessment Benefits:

- Facilitate "Health Equity"
- Effective care planning & personcentered care
- Defines diagnoses and appropriate treatment
- Enhances resident outcomes
- Appropriate reimbursement



*Heathy Equity" attainment of highest level of health for all people where everyone has a fair & just opportunity to attain their optimal health regardless of race, disability, sexual orientation, gender identity, socioeconomic, geography and language preference

Incomplete/Inaccurate Resident Assessment Implications

Delayed or Inappropriate
Treatment

Adverse Events
Increase
Mortality/Morbidity

Dissatisfaction

Conseduences

Legal/Regulatory

Increased HC Costs

Reputational Damage Loss of Credibility

Emotional Distress

Systemic Problems



Resident Assessment Critical Element Pathway 2/2025

Does the resident assessment accurately reflect the resident status (e.g. comprehensive, quarterly, sig COC in status)? if No, cite F641) DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicaid Services 7500 Security Boulevard, Mail Stop 52-12-25 Baltimore, Maryland 21244-1850



Center for Medicaid and State Operations/ Survey and Certification Group

Ref: S&C-05-20

DATE: March 10, 2005

TO: State Survey Agency Directors

FROM: Director

Survey and Certification Group

SUBJECT: All Provider Types - Independent but Associated Deficiency Citations

Letter Summary

- The purpose of this memorandum is to affirm our expectation that when noncompliance with a federal requirement has been identified, the facility or provider will receive a deficiency associated with the noncompliance.
- This memorandum restates existing CMS policy in Appendix P regarding independent but linked deficiency citations.
- This clarification applies to all provider types.

Attached you will find documents supporting this requirement including:

- · Regulatory language that identifies facility compliance requirements; and
- Relevant areas of the State Operations Manual (SOM), Appendix P Task 5C and 6. This
 guidance addresses the necessity of survey teams to review all requirements in order to
 determine if there was noncompliance with any of the regulations.

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.

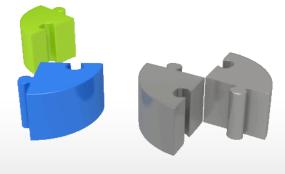
Some investigative protocols (such as those for pressure ulcers, hydration, and weight loss) include a list of regulations that may or may not be a concern depending upon investigation. The surveyor is expected to conduct further investigation, if concerns are identified, to determine whether non-compliance is present with those additional requirements.

For Example:

If a resident develops avoidable pressure ulcers after admission, the surveyor may make the determination that the facility failed to meet the requirement that a resident entering a facility without a pressure ulcer does not acquire one unless it is unavoidable. In that case, the pressure ulcer (sore) requirement (tag F314) is out of compliance. During the investigation, the surveyor might also find the facility did not conduct a comprehensive assessment of the resident's risk for development of a pressure ulcer. If so, the facility has also failed to comply with the regulatory language at F272. This tag requires a comprehensive assessment and is not specific to just pressure ulcers.



Consequences of Incomplete/Inaccurate Resident Assessment



Missed diagnoses Inadequate treatment **Increased LOS Unavoidable Rehospitalization** Possible fraud/Falsification **Inaccurate Facility Assessment**

Resident Assessment

One or 2 assessments with inaccurate MDS diagnosis coding should be cited as isolated.

If the surveyor identifies as pattern (three or more) of inaccurate coding for any new diagnosis (such as schizophrenia) with no supporting documentation by a physician, the surveyor should cite the scope of the non-compliance at a minimum of pattern or widespread as appropriate, make a referral to the State Board of Nursing, and see the guidance in Investigative Procedures for making a referral to the OIG



Root Causes of Incomplete & Inaccurate Resident Assessment

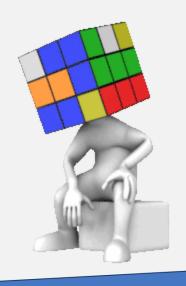
- Overdependence on Technology & Use of Al Platforms
- Not checking UNDER THE COVERS
- ☐ Shortfall involving Due Diligence process
- Week and poor assessment skills due lack of hands-on experience
- Lack of Critical Thinking
- No common sense
- Week Training/Orientation
- Time constraints/workload
- Uploading & Gathering of Hospital Records







Key Considerations: How to Have an Accurate Resident Assessment



Skills Competency

Skills Fair

Avoid "One Size Fits All" Orientation

Comprehensive Data Collection

Collaboration & communication

Annual Skills Fair: Alta Gardens



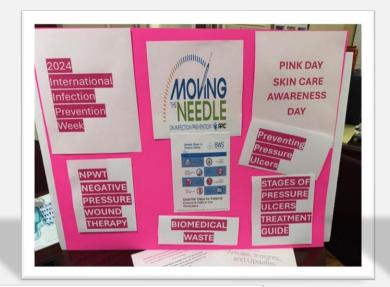




Annual Skills Fair











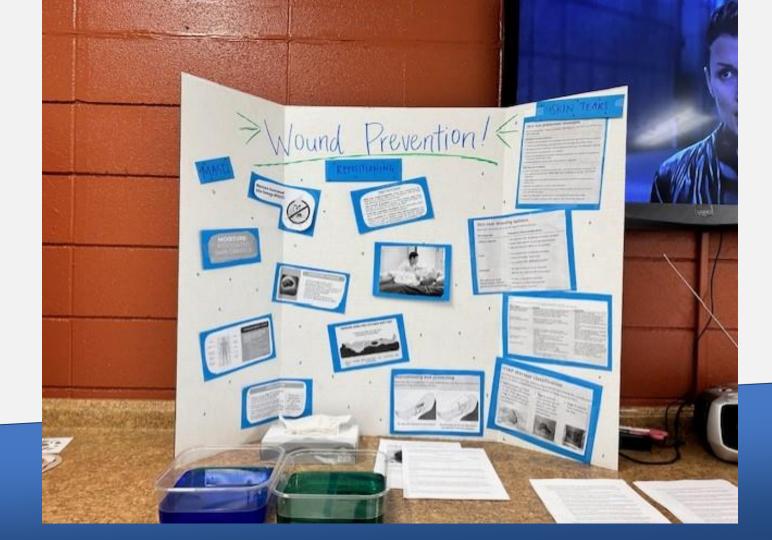
Annual Skills Fair: Windsor Elk Grove



F A I R



S K S R





Annual Skills Fair

Operational Complexities



In Closing....



A complete and accurate resident/patient assessment is the cornerstone of a safe & person-centered care.

If Hertz is known for renting cars & Southwest airlines is known for flying, our industry is known for providing care. CARE that we should never compromise despite all the adversities we face everyday.

<u>Judgie Imparo</u>, RN/MSN

Ohief Clinical Officer
NewGen Administrative Services