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Minnesota

COACHING ROOM

Surviving a Survey

May 21, 2024

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CMS RoPs for ER Preparedness

Five Categories

- Program
- Policy and Procedures
- Communication Plan
- Training and Testing
- Standby Power Systems Requirements

27 E-Tags

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MDH AL ER Preparedness Requirements

Promulgated 2021 with Assisted Living Licensure

Cited under 00680

Used appendix Z as the requirement

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LTC Emergency Power

E 0041: Nursing Home
00680: Assisted Living

Most cited emergency preparedness citation for several quarters

Most common reasons for citations:

- Couldn't provide documentation showing weekly visual inspections
- Couldn't provide documentation showing monthly test runs
- Unable to provide documentation of the 36 month four hour load test

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EP Training Program

E 0037: Nursing Home

00680: Assisted Living

Defines what should be included in training

Did move from 2nd place to 3rd most cited

Most common reasons for citation:

- The training is not specific to the facility plan
- Missing documentation of orientation and annual training
- No knowledge demonstration r/t training
- Missing documentation of training for volunteers & contracted staff

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EP Training Program

E 0039

- Defines who should be trained
 - Unable to provide documentation - staff training on orientation and/or annually
 - Unable to provide documentation - training for volunteers
 - Unable to provide documentation for contracted staff


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Review and Update

E 0004

✓
Unable to provide evidence the plan was reviewed and updated at least annually

☑ Annual review documentation is missing one or more requirements:	Date of review Updates made to the ER plan based upon the review
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Emergency Officials Contact Information


E 0031: Nursing Homes
00680: Assisted Living

- Missing contact information for one of the following
 - Federal, state, tribal, regional, and local EP staff
 - State licensing and certification agency
 - **MN Ombudsman for LTC**
 - Other sources of assistance




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Evacuation Planning

AL 00810

- Plans lack specificity / tailored approach
 - Identifying unique/unusual needs of residents
 - Unable to provide detailed actions for EE's to follow in case of emergency
 - Plan did not specify procedures for evacuating residents

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Evacuation Drills

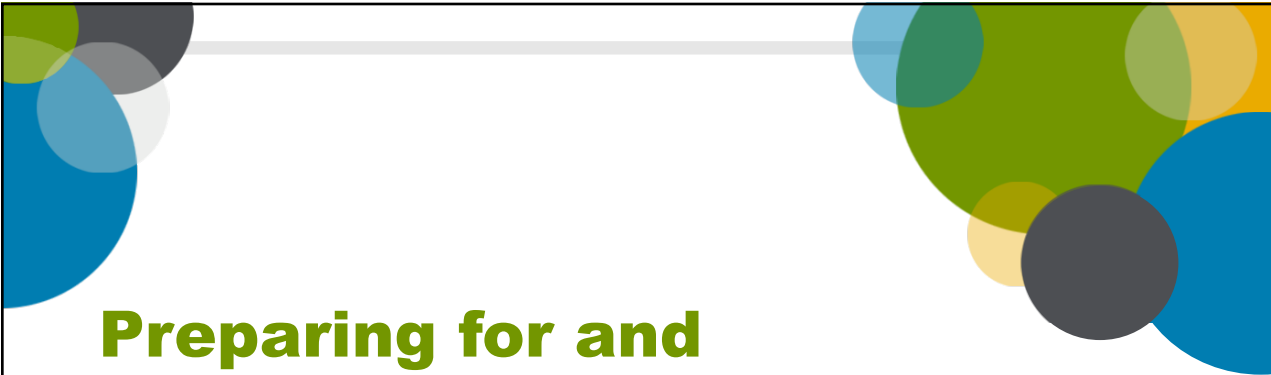
AL: 00680

Unable to provide documentation of required evacuation drill


Evacuation drill has no after-action report

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Preparing for and Surviving a Survey

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Survey Preparation

-  ROUTINE & CONSISTENCY
-  ADD ER / DISASTER PLAN TO QAPI
-  REGULAR, ROUTINE AUDITS
-  HAVE YOUR SURVEY RECORDS IN ONE PLACE
-  USE THE CRITICAL ELEMENT PATHWAY / MDH SURVEY TOOLS
-  WORK THESE AUDITS IN TO YOUR AWAIR / SAFETY PROGRAMS

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A few things about survey interviews

You can take a break

You can reference things and come back

Ask for the documents – and refer to the documents

The answer is never “I don’t know”

Don’t guess

Residents still come first


Watch for trends so you can be prepared

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Know the statutes & rules better than the surveyors

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Don't overshare


- Only answer the question you're asked
- Don't volunteer extra information
- Don't assume surveyors share your sense of humor
- Even "nice" surveyors are not there to be your friend



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 If you don't understand the question – ask them to clarify

 Ask them to see what they're referencing


 Refer to the documents or the data / information

 Don't just agree with a surveyor because

You fear their response


You don't want to be seen as not as "smart" as the surveyor.

Tips to avoid some of these potential problems



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Don't wait to clarify




If you obtain more information or thought of something that may impact an area of concern follow-up




They may seem to dismiss you or may have moved on – tell them anyway



Know your regulations



Follow up with written information after verbal discussions if needed



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