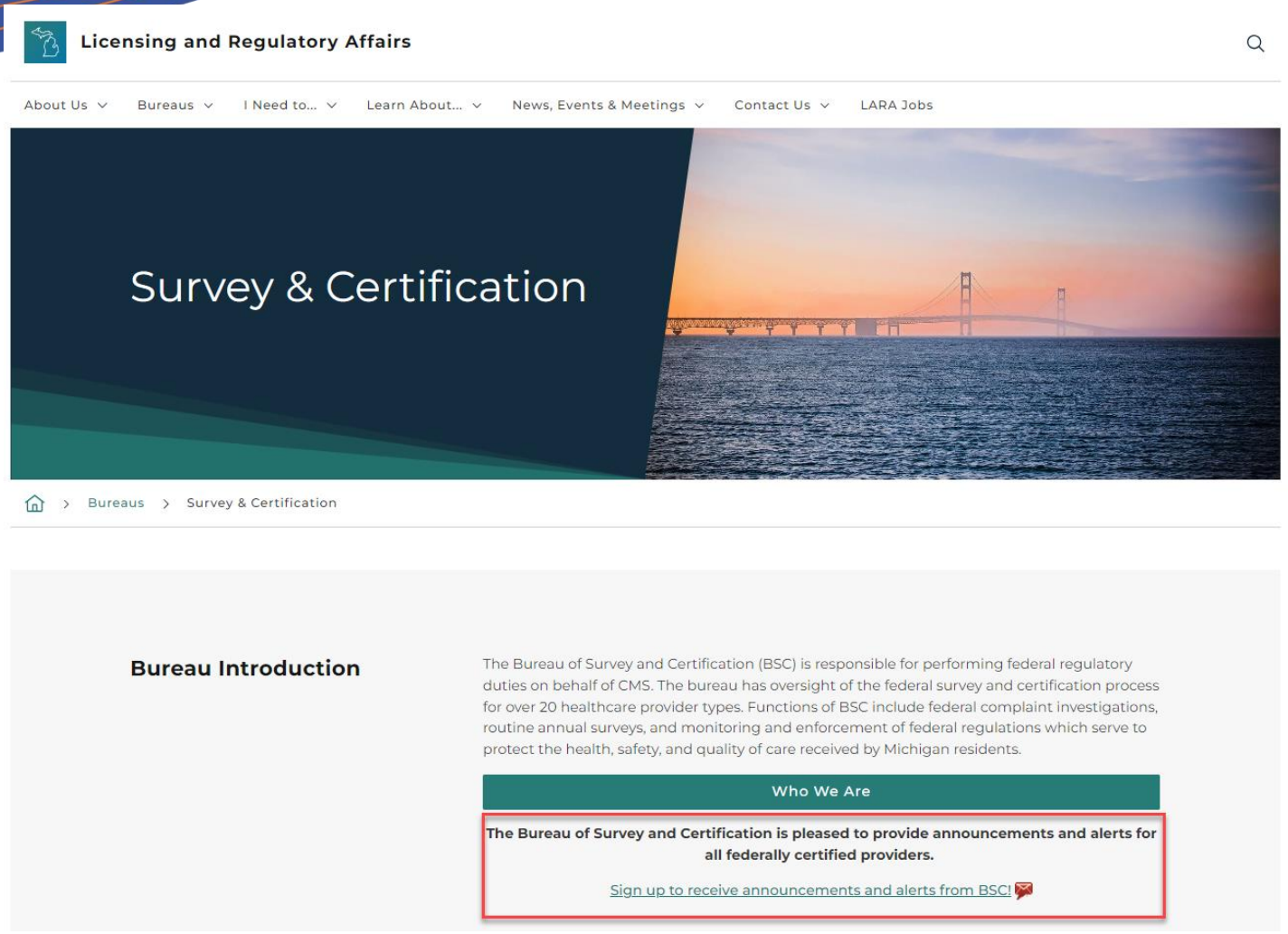
Long Term Care Stakeholder Meeting

Bureau of Survey and Certification

January 16, 2024

LARA
LICENSING AND REGULATORY AFFAIRS

GovDelivery System



Public Service Announcement

- Need agenda topics!
- Share best practices?
- Dates and times of future Meetings go be changed:
- Wednesday, time TBD

Agenda

- IPRAT, SLIC and State Survey Agency (SA/SSA)
- Attestation/Desk Review Revisit Pointers
- Egress for Revisits
- Updates on Covid: Guidance and Regulation
- Desk Review for FRIs

Infection Prevention Resource and Assessment Team (IPRAT)

- The Michigan Department of Health and Human Service's IPRAT is a team of subject matter experts from the Communicable Disease Division.
- IPRAT partners and collaborates to provide and strengthen infection prevention practice, containment strategies, and prevention plans.
- Non-Regulatory
- Consultative

State Licensing Consultative Section (SLCS)

- Falls under State licensing
- Non-punitive, consultations to include follow-up visits.
- Non-Regulatory

State Survey Agency

- Regulatory
  - Under Section 1864 of the Social Security Act
  - Also under 42 CFR 488
- Non-consultative during survey

State Survey Agency

- Must follow CMS Regulation and Survey Process
- May look at different areas and/or residents than IPRAT or SLCS
- IPRAT and SLCS findings do not necessarily indicate compliance with Federal Regulations

Attestation/Desk Review Revisit Pointers

- Submitted in a clear and concise manner
- Documents labeled appropriately
  - I.e. F684 element 1.pdf, not
  - 111223531scanner.pdf
- Organized logically, easy to follow
  - I.e., by Ftag and Element

Attestation/Desk Review Revisit Pointers

- Proof of Education, when part of the POC
  - Clear and concise
    - What was taught
    - Who was taught
- Audits, completed and accurate
  - Are audits truly showing 100% compliance?
- Do not need to submit the 2567
  - Can simply provide the POC portion

Attestation/Desk Review Revisit Pointers

- Show that your POC was implemented

- Read your notice
  - Will indicate if survey may be eligible
  - Provides instruction on how to submit
  - Provides what is necessary to submit

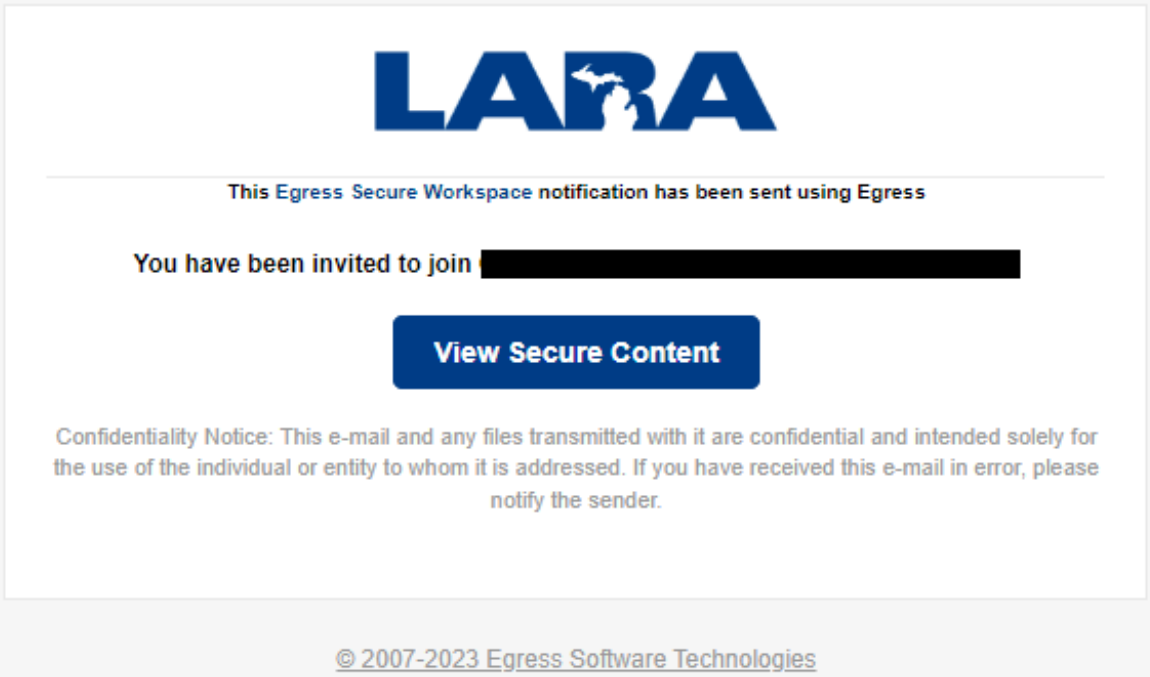
EGRESS for Desk Review/Attestation

- Will start to use EGRESS for document collection

- Instructions will be on notice
  - Submit attestation
  - Manager will provide link for document submission
  - Inform Manager and Analyst when all docs are submitted

- Desk Review revisits are prioritized and scheduled in same manner as all revisits.

Attestation/Desk Review Revisit Pointers



LARA

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Attestation/Desk Review Revisit Pointers

- Managers, what works well, what does not
- Providers, best practices

Guidance for the Expiration of the COVID-19 Public Health Emergency (PHE)

- In Part, F880 Infection Control states that a facility must establish and maintain an infection prevention and control program designed to provide a safe, sanitary, and comfortable environment and to help prevent the development and transmission of communicable diseases and infections. This program should follow accepted national standards and be revised as national standards change.

Desk Review for FRIs

- Facilities can not request a desk review for FRIs

- Managers review FRIs and determine:
  - Priority
  - Requirement for onsite investigation

- Facilities must follow the SOM for:
  - Incident reporting
  - Investigation reporting

Updates to reporting and investigating abuse

- For the investigation report:
  - must provide sufficient information to describe the results of the investigation
  - indicate any corrective actions taken, if the allegation was verified.
  - should include any updates to information provided in the initial report

Questions?