

## New CMS LTCF RoP (Overview Checklist)

This checklist provides a high level overview of the changes CMS made to the LTCF Requirements of Participation (RoP) and denotes in which of the three phases of implementation these changes need to be completed. It is intended to give centers an overview of the major changes that are explicitly stated in the new requirements so centers can know where to focus their efforts on meeting the new RoP. It does not describe the implicit changes that may need to occur when implementing the explicit changes. In other words, this document does not provide every action or task a center must take to comply with the new regulations. For example, changes to Policies & Procedures may also require changes in other documentation and staff training in your facility but those are not explicitly stated in the RoP, just the need to have a policy and procedure. It also does not reflect all aspects of the regulatory requirements nor does it reflect changes CMS has made to the format or citations of the existing requirements. Lastly, this document does not outline all the documentation requirements that must be made in the medical record nor the staff competencies that CMS expects.

The RoP will be implemented in a 3 year phased in approach.

- Phase 1 November 28, 2016
- Phase 2 November 28, 2017
- Phase 3 November 28, 2019

We recommend that you focus on Phase 1 requirements since they must be in place by the end of November 2016. We also recommend employing an organized process improvement approach to guide the effective implementation of the various steps will help to produce desired results. This is consistent with QAPI approach and has been repeatedly shown to result in better Survey compliance and resident outcomes.

As CMS provides more guidance, Surveyor and Citation (S&C) memos, and updates the State Operating Manual (SOM) over the next 12 to 24 months, we expect some information in this document to change.

This document contains explicitly mentioned changes in the RoP related to the following areas:

<ul style="list-style-type: none"><li>● Policies and Procedures</li><li>● Programs</li><li>● Plans</li><li>● Staff positions &amp; certification requirements</li></ul>	<ul style="list-style-type: none"><li>● Forms &amp; Documents</li><li>● In-services &amp; staff trainings</li><li>● Notifications &amp; resident rights</li><li>● Resident Care Plan &amp; Discharge Plan</li></ul>	<ul style="list-style-type: none"><li>● Processes, Systems &amp; Assessments</li><li>● Physical Environment</li></ul>
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**Policies & Procedures**

CMS requires that all SNFs have specific policies in place with specific components in each policy. This section outlines all of the new policies that are required and lists policies that have always need to be in place but CMS has made changes to what is required in those policies. Existing policy requirements that did not have any changes are **NOT** listed.

<b><u>New</u> Policies &amp; Procedures</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
1. Have you created all the <b><u>NEW</u></b> required policy and procedures?			
<input type="checkbox"/> Visitation rights of residents	§483.10(f)	Phase 1	
<input type="checkbox"/> Grievance policy	§483.10	Phase 1	
<input type="checkbox"/> Loss or damage of dentures	§483.55	Phase 2	
<input type="checkbox"/> Use & storage of foods brought to residents by family/others	§483.60	Phase 1	
<input type="checkbox"/> Infection Prevention and Control Program	§483.80	Phase 1	
<input type="checkbox"/> Compliance and Ethics	§483.85	Phase 3	
<input type="checkbox"/> Monthly drug regimen review	§483.45	Phase 1	<ul style="list-style-type: none"> <li>● Except (c)(2) chart review - Phase 2.</li> <li>● (e) Psychotropic drugs - Phase 2</li> </ul>
<input type="checkbox"/> Notifying clinicians	§483.50	Phase 1	
<input type="checkbox"/> QAPI feedback, data collection and monitoring	§483.75	Phase 3	
<input type="checkbox"/> QAPI systematic approach for quality improvement	§483.75	Phase 3	
<input type="checkbox"/> Smoking	§483.90	Phase 2	

<b><u>New Policies &amp; Procedures</u></b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
<input type="checkbox"/> Arrangements with other LTC facilities and other providers to receive residents during an event	§483.73(b)(7)	November 15 <sup>th</sup> 2017	Emergency Preparedness Requirements
2. Have you updated and modified <b><u>existing</u></b> policies that the new RoPs require changes?			
<input type="checkbox"/> Advance directives	§483.10(b)(8)	Phase 1	
<input type="checkbox"/> Bed hold policy	§483.15	Phase 1	
<input type="checkbox"/> Room Changes	§483.10(b)(15)	Phase 1	
<input type="checkbox"/> Abuse, neglect and exploitation of residents & property	§483.12	Phase 1	
<input type="checkbox"/> Reporting of crime	§483.12	Phase 2	
<input type="checkbox"/> Permitting Resident to Return to Facility <sup>3</sup>	§483.15	Phase 1	
<input type="checkbox"/> Admissions Policy	§483.15(a)	Phase 1	
<input type="checkbox"/> Staff Treatment of Residents	§483.12(b) <sup>1</sup>	Phase 1	
<input type="checkbox"/> Influenza and pneumococcal immunizations	§483.80	Phase 1	
<input type="checkbox"/> Disaster and Emergency Preparedness	§483.75(m)	Phase 3	
<input type="checkbox"/> Facility closure	§483.70	Phase 1	
<input type="checkbox"/> Administrator’s duties & responsibilities	§483.70	Phase 1	

## Programs

CMS requires that all SNFs have specific PROGRAMs in place, each with specific components. This section outlines all of the PROGRAMs that CMS explicitly states are being required.

Programs	FR Section	Phase (Date Enforced)	Notes on Phase In
1. Do you have all the <b>NEW</b> “programs” as required			
<input type="checkbox"/> Compliance & Ethics program	§483.85	Phase 3	
<input type="checkbox"/> Activities program	§483.24	Phase 1	
<input type="checkbox"/> QAPI program	§483.75	Phase 3	Some sections are in Phase 2 and two components are in Phase 1: <ul style="list-style-type: none"> <li>● Disclosure of information to Survey Agency 483.75(h);</li> <li>● Sanctions 483.75(i)</li> </ul>
<input type="checkbox"/> Infection Prevention and Control Program	§483.80	Phase 1	<ul style="list-style-type: none"> <li>● linking to facility assessment &amp; antibiotic stewardship - Phase 2</li> <li>● Requirement for an Infection Preventionist is in Phase 3.</li> </ul>
<input type="checkbox"/> Antibiotic Stewardship program	§483.80	Phase 2	

<b>Programs</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
<input type="checkbox"/> Staff training program (see training & in-service section)	§483.95	Phase 3	Note: the following need to be implemented in phase 1; §483.95(c), §483.95(g)(1), and §483.95(h).

**Plans**

CMS requires that all SNFs have specific facility PLANS in place, each with specific components. This section outlines all of the facility PLANS that are explicitly states as being required.

<b>Plans</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
1. Have you created all the new required facility plans?			
<input type="checkbox"/> Infection Control plan	§483.80	Phase 1	
<input type="checkbox"/> QAPI plan	§483.75	Phase 2	
<input type="checkbox"/> Emergency Plan	§483.73(a)	November 15 <sup>th</sup> 2017	Emergency Preparedness Requirements
<input type="checkbox"/> Communication Plan about Emergencies	§483.73(c)	November 15 <sup>th</sup> 2017	Emergency Preparedness Requirements

**Staff positions & certification requirements**

CMS requires new positions (which can be filled or shared by existing staff) that are required or has made changes to the qualifications for certain existing required positions. Required positions or qualifications (e.g. activities coordinator or feeding assistants) that did not have any changes are not listed here.

Staff positions & certification requirements	FR Section	Phase (Date Enforced)	Notes on Phase In
1. Do you have a person designated for the <b>NEW</b> required positions			
<input type="checkbox"/> Compliance Contact (in each facility)	§483.85(c)(1)	Phase 3	
<input type="checkbox"/> Person to Oversee Compliance (must be high-level person within the Organization)	§483.85(c)(2)	Phase 3	
<input type="checkbox"/> Compliance Officer (for organization when the Organization has ≥5 facilities)	§483.85(d)(2)	Phase 3	
<input type="checkbox"/> Compliance Liaison (in each facility when Organization has ≥5 facilities)	§483.85(d)(3)	Phase 3	
<input type="checkbox"/> Infection Preventionist	§483.80(b)	Phase 3	
<input type="checkbox"/> Grievance Officer	§483.10	Phase 1	
2. Does your <b>EXISTING</b> staff who are currently in a required position, meet new changes to those positions?			
<input type="checkbox"/> Dietician	§483.60(a)(1)(i)	Phase 1	Dietitians hired before 11-28-16 have 5 years to comply
<input type="checkbox"/> Food Service Director	§483.60(a)(1)(i)	Phase 1	Food Service Directors hired before 11-28-16 have 5 years to comply
<input type="checkbox"/> Social Worker	§483.70(p)(1)	Phase 1	

## Forms & Documents

CMS requires certain documents, assessments or plans be used that have a standard set of information in or on them, which we are labeling as “forms”. CMS allows the facility to design their own forms. (note: this does **not** contain list of “forms” a facility may need to develop to help them implement some of the RoP. This section does **not** summarize all the required documentation in the record.

New forms	FR Section	Phase (Date Enforced)	Notes on Phase In
1. Have you updated or created all the new forms?			
<input type="checkbox"/> Discharge Summary	§483.15(c)2 §483.21(c)2	Phase 2 Phase 1	Discharge summary requirements are in two sections.
<input type="checkbox"/> Discharge plan for each resident	§483.20	Phase 1	
<input type="checkbox"/> Resident assessment	§483.15	Phase 1	
<input type="checkbox"/> Baseline Care Plan	§483.21	Phase 2	
<input type="checkbox"/> Drug regime review report	§483.45(c)3	Phase 1	
<input type="checkbox"/> Facility wide assessment	§483.70(e)	Phase 2	

### In-services & staff trainings

CMS requires new in-services for staff, some prior to orientation, some once and others annually, some apply to all staff and others to specific staff on specific topics. This section lists the required in-services and staff who need to receive the training. It does not address trainings identified through facility assessment or QAPI program; nor assessing of staff competencies, which are all required as well. It also does not include existing required staff trainings that were not modified by CMS or specified in S&C memos.

In-services & staff trainings (specifically required)	FR Section	Phase (Date Enforced)	Notes on Phase In
1. Do you have in-services for all the <b>newly</b> required in-services?			
<input type="checkbox"/> Abuse, Neglect and Exploitation	§483.95(c)	Phase 1	
<input type="checkbox"/> Quality Assurance and Performance Improvement	§483.95(d)	Phase 3	
<input type="checkbox"/> Compliance and Ethics	§483.95(f)	Phase 3	
<input type="checkbox"/> Behavioral Health	§483.95(i)	Phase 3	
2. Have you updated <b>existing</b> in-services with the new information or new staff required to be included in these in-services?			
<input type="checkbox"/> Nurse aide training to include following components: <ul style="list-style-type: none"> <li><input type="checkbox"/> dementia management ((g)2)</li> <li><input type="checkbox"/> resident abuse ((g)2)</li> <li><input type="checkbox"/> care of the cognitively impaired, if applicable ((g)4)</li> </ul>	§483.95(g)(2) and (g)(4)	Phase 1	
<input type="checkbox"/> Nurse aide training on areas of weakness determined by performance reviews and the facility assessment	§483.95(g)(3)	Phase 3	



<b>In-services &amp; staff trainings (specifically required)</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
<input type="checkbox"/> Communication	§483.95(a)	Phase 3	
<input type="checkbox"/> Resident Rights and Facility Responsibilities	§483.95(b)	Phase 3	
<input type="checkbox"/> Infection Control	§483.95(e)	Phase 3	
<input type="checkbox"/> Emergency Preparedness Training and Testing	§483.73(d)	November 15 <sup>th</sup> 2017	Emergency Preparedness Requirements

### Notifications & resident rights

CMS requires allot of new information be included in various notifications to residents (and/or representative) at various times throughout the resident’s stay. This list only includes notifications that are NEW or MODIFIED and does not include existing notifications that did not change.

<b>Resident Notifications &amp; resident rights</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
1. Have you updated required notification information to be included at time of .....?			
<input type="checkbox"/> Admission	§483.15(a)	Phase 1	
<input type="checkbox"/> Before Transfer or discharge	§483.15(c)3, 4, 5 & 6	Phase 1	
<input type="checkbox"/> Orientation about Discharge or transfer	§483.15(c)7	Phase 1	
<input type="checkbox"/> Resident Rights (including how to file grievance or complaint)	§483.10(j)3	Phase 1	
<input type="checkbox"/> Participating and updating their Care planning process	§483.21(b)1(iv) & 2(i)E	Phase 1	
<input type="checkbox"/> Participating and updating their Discharge plan	§483.21(c)1(v)	Phase 1	
2. Have you updated required notification information about .....?			
<input type="checkbox"/> Baseline Care plan developed within 48 hrs of admission	§483.21(a)3	Phase 2	
<input type="checkbox"/> Bed hold policy	§483.15(d)	Phase 1	

<b>Resident Notifications &amp; resident rights</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
<input type="checkbox"/> Facility charges	§483.10(f) -10, 11 & 17	Phase 1	
<input type="checkbox"/> Choosing their physician	§483.10(d)(4)	Phase 1	
<input type="checkbox"/> Signing of care plan	§483.10(c)(2)(v)	Phase 1	
<input type="checkbox"/> Significant change in mental health – notify State Mental Health authority	§483.20(k)4	Phase 1	
<input type="checkbox"/> Abnormal lab or radiology results to the clinician	§483.50(a)2(ii) §483.50(b)2(ii)	Phase 1	

## Resident Care Plan & Discharge Plan

CMS requires changes to the resident care plan. This section highlights some of those changes. For details review section §483.21 of the RoP and we will be providing more information in checklists and templates in the future.

Resident Care plan & discharge plan	FR Section	Phase (Date Enforced)	Notes on Phase In
1. Have you created a <b>Baseline Care Plan</b> to be developed within 48 hours of admission?			
<input type="checkbox"/> Does it include the resident's goals	§483.21(a)1(ii)	Phase 2	
<input type="checkbox"/> Does it include all the required orders (physician, dietary, therapy, social services and PASSAR recommendations)?	§483.21(a)1(ii)	Phase 2	
2. Have you <u>updated</u> the format of your <b>Resident Care Plan</b> to incorporate resident centered information and discharge plan?			
<input type="checkbox"/> Have you update the resident assessment to incorporate person centered?	§483.21(b)1	Phase 1	
<input type="checkbox"/> Have you incorporated resident center goals and wishes about their care, activities, and lifestyle into the resident's care plan?	§483.21(b)1(iv)	Phase 1	
<input type="checkbox"/> Have you included resident's preferences for future discharge?	§483.21(b)1(iv)	Phase 1	
<input type="checkbox"/> Have you added new staff to the interdisciplinary team signing off on care plan?	§483.21(b)2(ii)	Phase 1	
<input type="checkbox"/> Are the services in the care plan culturally competent?	§483.21(b)3(iii)	Phase 1	

Resident Care plan & discharge plan	FR Section	Phase (Date Enforced)	Notes on Phase In
<input type="checkbox"/> Have you incorporated trauma informed care into the care plan?	§483.21(b)3(iii)	Phase 3	
3. Have you added a <b><u>Discharge Plan</u></b> as part of the resident’s care plan?			
<input type="checkbox"/> Does your Discharge Plan contain all the information required in a plan?	§483.21(c)	Phase 1	
<input type="checkbox"/> Have you incorporated resident discharge goals and wishes into the resident’s care plan?	§483.21(c)1(vi)	Phase 1	
<input type="checkbox"/> Have you involved the interdisciplinary team in developing and signing off on discharge care plan?	§483.21(c)1(v)	Phase 1	
<input type="checkbox"/> Have you shared the discharge plan with the resident and their representative	§483.21(c)1(v)	Phase 1	

## Processes, Systems & Assessments

CMS specifies throughout the new RoPs that facilities should conduct assessments, monitor systems, and collect data. This section highlights some of those requirements but will be added to over time as more are defined by CMS in SOM, S&C memos, etc.

<b>Processes, Systems &amp; Assessments</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
1. Have you created systems to collect data, track performance and assess the facility?			
<input type="checkbox"/> Have you created a grievance process?	§483.10	Phase 1	
<input type="checkbox"/> Have you created a system for the accounting of each resident's personal funds?	§483.10	Phase 1	
<input type="checkbox"/> Have you created a discharge planning process?	§483.21	Phase 1	
<input type="checkbox"/> Have you developed a monthly drug regimen review process?	§483.45	Phase 1	
<input type="checkbox"/> Have you created a facility wide assessment?	§483.70	Phase 2	
<input type="checkbox"/> Have you created a system to track, report, identify and prevent adverse events?	§483.75	Phase 3	
<input type="checkbox"/> Have you created a system to obtain feedback from staff, residents and families?	§483.75	Phase 3	

<b>Processes, Systems &amp; Assessments</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
<input type="checkbox"/> Have you created a system to collect data from all departments, including the establishment and monitoring of performance indicators?	§483.75	Phase 3	
<input type="checkbox"/> Have you developed a system to prevent, identify, report, investigate, and control infections and communicable diseases for residents, staff, etc.?	§483.80	Phase 2	
<input type="checkbox"/> Have you developed a system to monitor antibiotic use?	§483.80	Phase 2	
<input type="checkbox"/> Have you developed a system to detect ethical and compliance violations and allow staff to report incidents?	§483.85	Phase 3	
<input type="checkbox"/> Have you created a process to ensure the integrity of reported data?	§483.85	Phase 3	
<input type="checkbox"/> Have you developed a system that allows residents to call staff directly for assistance?	§483.90	Phase 3	
<input type="checkbox"/> Have you developed a system to track the location of on-duty staff and sheltered residents during and after an emergency?	§483.73(b)(2)	November 15th 2017	Emergency Preparedness Requirements
<input type="checkbox"/> Have you developed a process for cooperation and collaboration with local, tribal, regional, State or Federal emergency preparedness officials?	§483.73(a)(4)	November 15th 2017	Emergency Preparedness Requirements

**Physical environment**

CMS is requiring centers that are constructed, re-constructed, or newly certified after the effective date of November 28, 2016 to accommodate no more than two residents in a bedroom. CMS is also requiring centers that are constructed, or newly certified after the effective date of this regulation to have a bathroom equipped with at least a commode and sink in each room.

<b>Physical Environment</b>	<b>FR Section</b>	<b>Phase (Date Enforced)</b>	<b>Notes on Phase In</b>
1. Have you addressed the changes to physical environment?			
<input type="checkbox"/> Have you conducted a regular inspection of all bed frames, mattresses, and bed rails as part of a regular maintenance program to identify areas of possible entrapment?	§483.90(c)	Phase 1	
<input type="checkbox"/> Have you checked construction and reconstruction plans to ensure that bedrooms accommodate no more than two residents?	§483.90(e)1(i)	Phase 1	Only applies to facilities that receive approval of construction or reconstruction or a newly certified after November 28, 2016.
<input type="checkbox"/> Have you checked that the resident has a separate bed of proper size and height for the safety and convenience of the resident?	§483.90(e)(2)(i)	Phase 1	
<input type="checkbox"/> Have you checked that each resident room has its own bathroom equipped with at least a commode and sink?	§483.90(f)	Phase 1	Only applies to facilities that receive approval of construction or



Physical Environment	FR Section	Phase (Date Enforced)	Notes on Phase In
			reconstruction or a newly certified after November 28, 2016.
<input type="checkbox"/> Is the center adequately equipped to allow residents to call for staff assistance through a communication system from each resident's bedside?	§483.90(g)(1)	Phase 3	
<input type="checkbox"/> Have you established smoking areas that takes into account nonsmoking residents and complies with applicable Federal, State, and local laws and regulations regarding smoking, smoking areas, and smoking safety?	§483.90(h)(5)	Phase 2	

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