



GREATER NEW YORK HEALTH CARE FACILITIES ASSOCIATION

519 Eighth Avenue, 16th Floor, New York, NY, 10018
Phone: 212-643-2828 Fax: 212-643-2956 www.gnyhcfa.org



MEMO 23-19

TO: Administrator, DON, Director of Building, Social Work & QA Committee Members

FROM: Mary Gracey- White RN, BSN, QCP Director of Regulatory Compliance & Arlette Drigpaul, Infection Preventionist/Education Coordinator

DATE: July 19, 2023

RE: Nursing Home Provider Association Meeting & Member Updates

Earlier today the Association participated in the Nursing Home Provider Association Meeting. The following are the highlights from the call:

1. **Top 10 NH citations** from most to least frequently cited:
 - F689 Free of Accident Hazards/Supervision/Devices
 - Especially as related to elopement; ensure ALL staff, including **agency** staff, receive education on elopement prevention and response.
 - F609 Reporting of Alleged Violations
 - Report any allegation of abuse within 2 hours; also contact and notify local law enforcement as indicated for any suspected crime against a resident.
 - F812 Food Procurement/Store/Prepare/Serve-Sanitary
 - Most problems/concerns identified in the kitchen results result in a citation that is widespread at level E or F. Review facility P/Ps and include competencies and direct observations.
 - F656 Develop/Implement comprehensive Care Plan
 - Review facility practices to ensure responsible staff are developing/evaluating and updating resident Care Plans.
 - F584 Safe/Clean/Comfortable/Homelike Environment
 - Conduct environmental rounds – ensure there are no loose/dirty privacy curtains, furniture are not broken, walls are without chipped paint, ceiling tiles are clean, intact, and without water marks
 - F684 Quality of Care
 - Many quality of care issues have the potential to result in an IJ
 - F610 Investigate/Prevent/Correct alleged Violation.
 - Conduct and report complete investigations within 5 working days of the event.
 - F657 Care Plan Timing and Revision- see above

- F880 Infection Prevention and Control
 - Many missed opportunities for performing hand hygiene; provide education to all staff and have them perform a return demonstration.
 - F600 Free from Abuse and Neglect
 - Again, report any allegation of abuse within 2 hours; also contact and notify local law enforcement as needed for any suspected/alleged crime.
 - * The Association has requested a list of other citations that result in IJ from this top 10 list.
2. As of July 17, 2023, the DOH has been participating in **Facility Provider Visits**, whereby the Central Office Leadership would visit your facility for open discussions with the aim of better understanding the facility's challenges and fostering collaboration. Recent visits across NYS have included discussions between the DOH and facility administrative staff include pre, during, and post Covid eras, special populations (e.g. younger residents), staffing shortages, partnerships with nearby hospital(s) and other community resources, and concerns related to the industry (e.g., regulatory, surveys). If you would like to participate in the Facility Provider Visit, please reach out to the Association and we will forward the necessary information to the Department.
 3. Update on plans to reduce the **HERDS Survey** reporting is actively underway as per NYSDOH.
 4. **Schizophrenia Audits** – these audits are unique to CMS and the DOH does not have a role in the audits. However, during regular recertification survey the survey team does look at the facility's antipsychotic usage (e.g., gradual dose reduction, alternative therapies, etc.).
 5. **Survey timing:** the Department hopes to be able to abide by the 9-15 months survey cycle by the 3rd quarter of 2024. The Department states it has made significant gains in addressing survey backlogs.
 6. **Covid Vaccines:** at present, the bivalent Covid-19 vaccine is the most current and facilities are encouraged to continue to offer to residents and staff. Of note, last month the FDA recommended a single-strain booster for Fall and Winter to specifically target the current omicron subvariant XBB.1.5. More information will be released as it becomes available.

Additionally, the DOH will be hosting a **webinar** On Non-Emergency Medical Transportation: process Overview on Thursday July 27, 2023, at 9AM. We encourage you to register using the following [link](#).

Lastly, CMS is offering an updated video tutorial to assist providers with guidance application and interview strategies for the cognitive assessment known as the **Brief Interview for Mental Status (BIMS)** found in the MDS 3.0 RAI v1.18.11, effective October 1, 2023. To access the video, click on the following link: [BIMS Video Tutorial](#).

Do not hesitate to contact the Association with any questions. Thank you.