

Are you ready for DHS Staffing Reviews?

QCHF Webcast

July 10, 2006

10:00 am to 11:30 am

Learning Objectives

- Gain an understanding of the legal basis and authority for the reviews.
- Understand your legal and regulatory responsibility for public reporting of staffing information.
- Learn about how DHS will conduct the review process including notification, sample day selection, analyst review procedure.
- Learn which types of records will be subject to review.
- Learn what needs to be done in order to prepare for the review.

Learning Objectives

- Learn how to exert control over the review process.
- Learn more about potential actions that can be taken against the facility when instances of non-compliance are noted.
- Learn tips to follow in order to ensure your facility has captured and recorded all allowable direct care hours.
- Learn how to respond to findings of non-compliance.

Legal Basis and Authority

Legal and Regulatory Requirements for Public Disclosure

L&C Review Process

Pertinent Records for Staffing

- Resident Census Records
- Daily Staff Time-Keeping Records
- Payroll Records
- Staffing Schedules
- Resident Medical Record
- Ancillary Provider Contracts or Agreements
- Quality assurance or other related records

Resident Census Records

- Daily Midnight Census Record
- Shift Census Record
- Daily Discharge Logs
- Transportation Logs
- Resident Medical Record
- Any other record that identifies the actual location of a resident on a particular date and time.

Staff Daily Time-Keeping Records and Procedure

- Manual
 - Written Time Card
 - Written Sign in sheet
 - Other Method
- Electronic
 - Time clock and cards
 - Chronus or related electronic system
- Staff time-keeping and recording policy

Payroll Records

- Daily Payroll Summary
- Weekly Payroll Summary
- Bi-Weekly Payroll Summary
- Monthly Payroll Summary
- Payroll Category Descriptions and Definitions
- Workers Compensation Summary Payroll Reports
- Workers Compensation Reports
- Payroll Tax Records 941s and DE 3s

Staffing Schedules

- Weekly Shift Planning Schedules used in preparing staff schedules.
- Daily Published Staff Schedules By Shift
- Daily Updated or Modified Staff Schedules By Shift
- Care Management and Supervision Schedules By Shift
- Facility staffing policies

Other Important Records

- Resident Medical Records
- Ancillary Provider Contracts and Agreements
 - Therapy Companies or Departments
 - Nursing Registry and Temporary Staffing (includes invoices for payment)
- Notes and other information from Medical Product Suppliers that perform clinical assessments as part of service.
- Records of quality assurance or related assessments conducted by corporate or outside agency staff.

How to Prepare for the Review

- Identify the location of all of the records that are relevant to the review for the time periods of 2002, 2003, 2004, and 2005.
- If documents are not located at the facility and will not be brought to the facility for review, notify L&C immediately.
- Discuss special circumstances with L&C in advance, for example, split location of financial and medical records.

How to Prepare for the Review

- Centralize all records in one location at the facility or otherwise.
- Organize records by record type.
- Organize time keeping, staffing, and payroll record by week, month, year, etc. for easy access.
- As time permits, ensure summary records are complete and accurate.

Exert Control over the Review

- Participate in the entrance conference.
- Establish facility contact.
- Establish communications protocol.
- Suggest requests for information be in writing and when supplied documented similarly.
- Participate in face to face exit conference.
- Provide additional information within specified requested time frames.

Potential Actions for Non-Compliance

Tips to Follow

How do you ensure all allowable and creditable direct care hours are captured?

- Consider possible mitigation factors:
 - Does your time-keeping system capture actual time worked for salary staff such as DSD, DON, MDS Nurse, other clinical staff?
 - When a shift was short, did: Management staff cover? Other staff work overtime?

Tips to Follow

How do you ensure all allowable and creditable direct care hours are captured?

- Was registry staff in house or available?
- Were ancillary provider staff present and providing clinical care or support such as wound care (Patient assessment is a clinical function)?
- Were corporate staff present and conducting clinical care?

Tips to Follow

- Is the daily resident census information (taken at midnight) reflective of the actual resident census at a particular time or shift?
 - Were any patients sent to the hospital, away on a pass, at ancillary provider, or other?
 - Patient transportation, shift logs, and the resident medical record will be key to supporting the true census at a specific date and time.

Tips to Follow

- Outline all mitigating factors and make your case to the analytical staff.
 - Formulate a written response.
 - Support the response with available supporting documentation.
- If you believe you have a strong case, don't give up on the first try.
 - Seek immediate advice from CAHF.
 - Go to L&C Supervisory Staff if necessary.

How to Respond to Findings of Non-Compliance

Questions

And

Answers