**SNF Requirements of Participation**

*Developing Competency & Skills For Nursing Staff*

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10:30am-11:45am

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### Objectives

- Identify the elements of competencies and evidenced base education to develop skills
- Develop a facility plan to implement competency based training
- Describe three key strategies for nursing leadership to operationalize the training process

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### Phases of Implementation

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

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### New F-Tags

- **F726 – Competent Nursing Staff**
- **F727 – RN 8hrs, 7 days/week, Full Time DON**
- **F728 – Facility Hiring & Use of Nurse Aide**
- **F729 – Nurse Aide Registry Verification, Retraining**
- **F730 – Nurse Aide Performance Review – 12 hours/year In-service**
- **F731 – Waiver – Licensed Nurses 24hr/day & RN Coverage**
- **F732 – Posted Nurse Staffing Information**

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### Training Requirements for Phase 2

<table>
<thead>
<tr>
<th>Regulatory Area</th>
<th>Training Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Resident Rights</td>
<td>1. Add: Aging &amp; Disability Resource Center &amp; Medicaid Fraud Control Unit Contact Information (email too)</td>
</tr>
<tr>
<td>- Admission, Transfer, Discharge</td>
<td>2. Transfer &amp; Discharge Documentation</td>
</tr>
<tr>
<td>- Person-Centered Care Planning</td>
<td>3. Baseline Care Plan (68 hour core plan)</td>
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<tr>
<td>- Nursing Services</td>
<td>4. Nursing Staffing Plan &amp; Competencies/Skills</td>
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<tr>
<td>- Behavioral Health Services</td>
<td>5. Dementia Care</td>
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<tr>
<td>- Pharmacy Services</td>
<td>6. Medical Chart Review &amp; Psych meds</td>
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<tr>
<td>- Dental Services</td>
<td>7. Lost or Damaged Dentures Policy</td>
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<td></td>
<td>8. Referral and Transportation</td>
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<td>9. Provision of Services</td>
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<tbody>
<tr>
<td>Food and Nutrition Services</td>
<td>Dietary Staffing Plan, Ethnic, Cultural, &amp; Religious Preferences</td>
</tr>
<tr>
<td>Administration</td>
<td>Facility Wide Resource Assessment</td>
</tr>
<tr>
<td>Quality Assurance &amp; Performance Improvement</td>
<td>Provide initial QAPI plan to survey team</td>
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<tr>
<td>Infection Control</td>
<td>Incorporate Infection Control into FWRA, Antibiotic Stewardship Program</td>
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<tr>
<td>Physical Environment</td>
<td>Smoking Policies</td>
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### Facility Training Program

- To ensure any training needs are met for:
  - New Staff
  - Existing Staff
  - Individuals providing services under a contractual arrangement
  - Volunteers

### Facility Training Program

- Consistent with their expected job roles
- What policies are required
- Review job descriptions
- Do they meet professional standards of practice?

### Nursing

Take into account the responsibility that certain types of staff have such as RNs and LPNs overseeing the medical management of residents with regard to:
- Medications
- Fall Prevention
- Pressure injuries
- Readmission to the hospital

### F726 – Competent Nursing Staff

- Facility must have sufficient nursing staff with the appropriate competencies and skill sets to provide nursing and related services to assure resident safety.
  - And
  - Attain or maintain the highest practicable physical, mental, and psychosocial well-being for each resident as determined by:
    1. Resident Assessments
    2. Individual Plans of Care
    3. Considering #, acuity, and diagnoses of population in accordance with the facility assessment

- Facility must ensure that licensed nurses have the specific competencies and skill sets necessary to care for resident needs as identified through resident assessments and described in the plan of care.
- Providing care includes but is not limited to assessing, evaluating, planning, and implementing resident care plans and responding to resident needs.
Competencies

- Evaluating the ability to perform a task based on clinical skills, knowledge, education, and experience
- Ongoing (Assess, monitor, maintain, and improve skills)
- To prevent negative outcomes
- To provide excellent care and treatment

Proficiency of Nurse Aides

“Facility must ensure that nurse aides are able to demonstrate competency in skills and techniques necessary to care for resident needs as identified through resident assessments and described in the plan of care”

Competency - Definition

“A measurable pattern of knowledge, skills, abilities, behaviors and other characteristics that an individual needs to perform work roles or occupational functions successfully”

All nursing staff must also meet the specific competency requirements as part of license and certification requirements defined under state law or regulation.

Types of Care

25 Bed dementia care

- Average census is 22
- Competencies Required:
  - Dementia Care
  - Behavior Training
  - Medication Management
  - Activities for Dementia Care
  - ADLs
  - Chronic disease management

Peri-Care Return Demonstration

- UDI CARE RETURN DEMONSTRATION
- Proficiency of Nurse Aides
- "Facility must ensure that nurse aides are able to demonstrate competency in skills and techniques necessary to care for resident needs as identified through resident assessments and described in the plan of care”

Competencies listed in SOM

- Preventing and reporting abuse, neglect, and exploitation
- Dementia management
- Infection Control
- Competencies related to an approved nurse aide training and evaluation program
- Medication management
- Change in condition
- Resident rights
- Person-centered care
- Communication
- Basic nursing skills
- Basic restorative services
- Skin and wound care
- Pain management
- Cultural competency
Change in Condition

- Be able to identify and address a change in condition
- Demonstrate effective actions to address a change in condition

Nurse aide – document and inform supervisor
Licensed nurse – data collection and assessment/evaluation, inform practitioner or physician

Change in Condition: When to report to the MD/NP/PA

- Immediate Notification
  - Any symptom, sign or apparent discomfort that is:
    - Acute or Subacute in onset
    - A Marked Change in the patient in relation to usual symptoms
      and signs
    - Unexplained by reasons already documented

- Non-Immediate Notification
  - New or worsening symptoms that do not meet above criteria

Available Tools

Detecting and communicating a change in condition
AHRQ – Agency for Health Care Research and Quality
INTERACT
https://interact2.net/tools_v4.html

Cultural Competency

A set of behaviors and attitudes held by clinicians that allows them to communicate effectively with individuals of various cultural backgrounds and to help provide care that is appropriate to the culture and the individual

1. Cultural responsiveness
2. Cultural awareness
3. Cultural sensitivity

Examples of Evaluating Competency
- Lecture with return demonstration for physical activities
- A pre-test and post-test for documentation issues
- Demonstrated ability to use tools, devices, or equipment that were the subject of the training an used to care for residents
- Reviewing adverse events that occurred as an indication of gaps in competency
- Demonstrated ability to perform activities per scope of practice as in license or certification (skills fair)
- Annual Review

Competency Based Training Program

a. Evaluates current staff training program to ensure competencies
b. Identifies gaps in education that may contribute to poor outcomes
c. Outlines what education is needed based on resident population
d. Delineates what specific training is needed based on facility assessment
e. Details the tracking system used to ensure competency program is assessing, planning, implementing, and evaluating effectiveness of training
f. Ensures the competency training is not limited to online computer based but also test for critical thinking skills as well as the ability to manage care in complex environments with multiple interruptions
F727 – Registered Nurse

- Facility must use the services of a registered nurse for at least 8 hours per day, 7 days per week unless there is a waiver in place.
- Facility must designate a registered nurse to serve as the Director of Nursing on a full time basis unless there is a waiver in place (35 or more hours).
- Director of Nursing may serve as the “charge nurse” only when the facility has an average daily occupancy of 60 or fewer residents.

F728 – Hiring & Use of Nurse Aides

Facility must not use any individual working in a facility as a nurse aide for more than 4 months, on a full time basis unless that individual:

- Is competent to provide nursing and related services
- Has completed a training and competency evaluation program or a competency evaluation program approved by the State as meeting the requirements
- Has been deemed or determined competent

Temporary Employees

Facility must not use on a temporary, per diem, leased, or any basis other than a permanent employee any individual who does not meet the requirements.

***Agency or any other staff use does gives us a “pass” on the requirements.

Minimum Competency

Facility must not use any individual who has worked less than 4 months as a nurse aide in a facility unless the individual:

- Is a full time employee in a state-approved training and competency evaluation program
- Has demonstrated competence through satisfactory participation in a state-approved nurse aide training and competency evaluation program or competency evaluation program
- Has been deemed or determined competent

F729 – Registry Verification

Before allowing an individual to serve as a nurse aide, a facility must receive registry verification that the individual has met competency evaluation requirements unless the individual:

- Is a full-time employee in a training and competency evaluation program approved by the state or
- Can prove that he or she has recently successfully completed a training and competency evaluation program or competency evaluation program approved by the state and has not yet been included in the registry (facility must follow up to ensure that the individual actually becomes registered).

Multi-State Registry Verification

“Before allowing an individual to serve as a nurse aide, a facility must seek information from every State registry that the facility believes will include information on the individual.”
Required Retraining

If there has been a continuous period of 24 months since the individual has provided nursing or related services for monetary compensation, the individual must complete a new:

- (NATCEP) Nurse Aide Training and Competency Evaluation Program
- (CEP) Competency Evaluation Program

***Prove one 8 consecutive hour day of nurse aide work in 24 months to keep current

F730 – Regular In-Service Education

- Facility must complete a performance review of every nurse aide at least once every 12 months and provide regular in-service education based on the outcome of these reviews
- Each nurse aide must have no less than 12 hours of in-service education based on their individual performance review
- Calculate the date due by the employment date rather than the calendar year

In-Service Education Probes

- What is the process for reviewing the performance of your nurse aides?
- How are these reviews documented and does the documentation reflect at least 12 hours of in-service training per year based upon the aide’s individual performance review?
- What is your evidence that you can produce that demonstrates the in-service education provided addresses:
  - Areas of weakness identified on the performance review
  - Special resident needs
  - Needs of residents with cognitive impairments

F731 – Waiver of Licensed Nurses 24 Hour Basis

- Facility demonstrates that facility has been unable despite diligent efforts (including offering wages at community prevailing rates for nursing homes) to recruit
- State determines that a waiver of this requirement will not endanger the health or safety of the residents
- An RN or physician is on-call to respond immediately to calls from facility
- Subject to annual review

F731 – Waiver of Licensed Nurses 24 Hour Basis

- The state agency granting the waiver provide notice of the waiver to the Office of the State Long Term Care Ombudsman’s Office and the protection and advocacy system in the State for individuals with a mental disorder who are eligible for such services
- The facility must notify the residents and their representatives of the waiver
- In granting or renewing a waiver, facility may be required to use other qualified licensed personnel

Waiver for RN More Than 40 Hours

- Facility is in a located in a rural area and the supply of skilled nursing facility services in that area is not sufficient to meet the needs of the individuals residing in that area
- Facility has one full-time registered nurse who is regularly on duty at the facility 40 hours per week
- Facility has only patients that do not require services of an RN or physician for a 48 hour period
- Facility has made arrangements for an RN to come in and provide services if needed
- Notices provided to Advocacy Organizations
Facility must post nurse staffing data on a daily basis at the beginning of each shift. Posting must:

- Be in a clear and readable format
- In a prominent place readily accessible to residents and visitors
- Provide access to posted nurse staffing data to public
- Maintain records for 18 months

Resources / References

https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Nursing-Homes.html

Questions?

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