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**Preparing
Facilities for
Surveys**


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Disclosure Statement

Norman Pillsbury, Pharm.D., BCPS has disclosed that he has no relevant financial disclosures. No one else in a position to control content has any financial relationships to disclose.

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The University of Florida College of Pharmacy is accredited by the Accreditation Council for Pharmacy Education as a provider of continuing pharmacy education.



Objectives

At the completion of this activity, the participant will be able to:

- Discuss methods of how to prepare facilities for surveys
- Describe monthly and quarterly reports prepared by consultant pharmacists for various practice settings
- Outline resources available to a consultant pharmacist to help them stay up to date.

Survey Preparation- SNF

- **Regulatory inspection:** medication carts and medication rooms → proper storage, expired, refrigerated temperature logged, labeling, over the counter medications (not labeled in SNF, different in ALF), separation by route of admin/dosage form
- **Chart audits** document every month, gradual dose reductions (must include follow up in audit by physician with documentation). Written policy and procedure must be up to date with copies provided
 - Re-check most critical patients look closely into those charts
- **Med pass observation:** consultant must observe a nurse passing medications
- **Licensure review:** home, pharmacy, consultant licenses. Must be posted in home visible area

Center for Medicare & Medicaid Services, Nursing Homes. <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLongTermCareAndRegulation/NursingHomes.html>

Labeling

- Proper labeling is important to ensure that the right drug is going to the right resident
- Every prescription should always have a label
- Non-prescription medications should have an identifier to which resident it goes to





Survey Preparation- ALF

- Follow same medication cart and room audits as SNF
- Storage and labeling same as SNF
- Must have policy and procedure manual in place
- Licenses must be available and posted
- Medication pass observation (for med tech)
- Must know which ALF license your home holds in order to audit charts accordingly

Center for Medicare & Medicaid Services, Nursing Homes. <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawAndRegulations/NursingHomes.html>



Survey Preparation- ALF

- The Mock Survey Process in Assisted Living
 - Medication compliance and proper pharmacy procedures are essential to operating a safe ALF.
 - Perform regular Mock Surveys which include each of the following elements:

Leslie Tamayo Consulting & Management, Survey Readiness and the Mock Survey Process in Assisted Living. <https://www.leslietamayoc.com/resources/articles-and-whitepapers/survey-readiness-in-assisted-living>



Survey Preparation- ALF

- Elements of the Mock Survey Process in Assisted Living
 - Observe at least two medication passes
 - Handwashing between residents
 - Verification of medication: correct resident, dose, time
 - Documentation of administration

Leslie Tamayo Consulting & Management, Survey Readiness and the Mock Survey Process in Assisted Living. <https://www.leslietamayoc.com/resources/articles-and-whitepapers/survey-readiness-in-assisted-living>

Survey Preparation- ALF

- Elements of the Mock Survey Process in Assisted Living
 - Narcotic documentation and count
 - PRN documentation of reason given and effectiveness
 - Blood pressure and other parameters measured, documented, and followed
 - Eye drop administration: gloves, handwashing, time between drops

Lorae Tamayo Consulting & Management, Survey Readiness and the Mock Survey Process in Assisted Living <https://www.researchgate.net/publication/338888888>

Survey Preparation- ALF

- Elements of the Mock Survey Process in Assisted Living
 - Crushed medications have order for crushing
 - Medication aide able to identify medication and reason for use when questioned
 - Audit medication cart and room for three to four residents
 - Verify orders, MAR, and medication are in agreement

Lorae Tamayo Consulting & Management, Survey Readiness and the Mock Survey Process in Assisted Living <https://www.researchgate.net/publication/338888888>

Survey Preparation- ALF

- Elements of the Mock Survey Process in Assisted Living
 - Ensure there are no medications in cart or med room without orders
 - Ensure there are no orders without medication
 - Ensure orders match the medication record
 - Verify glucometer control log is kept up to date

Lorae Tamayo Consulting & Management, Survey Readiness and the Mock Survey Process in Assisted Living <https://www.researchgate.net/publication/338888888>



Survey Preparation- ALF

- Elements of the Mock Survey Process in Assisted Living
 - Review the pharmacy order and receipt log
 - Review process for drug destruction and documentation
 - Audit four to five narcotic medications to ensure count and documentation is correct
 - Ensure that topicals, eye drops, and external use drugs are kept separate from PO medications

Levine Taniguchi Consulting & Management, Survey Readiness and the Mock Survey Process in Assisted Living. <https://www.levtaniguchi.com/survey-readiness-and-the-mock-survey-process-in-assisted-living/>



Survey Preparation- ALF

- Elements of the Mock Survey Process in Assisted Living
 - Verify that the medication refrigerator has a temperature log that is being kept
 - Verify medication room, key, and cart security
 - Ensure that poison control number is posted in the medication room and drug reference material is available in electronic or paper form
 - Ensure that refrigerated narcotics are locked by two locks

Levine Taniguchi Consulting & Management, Survey Readiness and the Mock Survey Process in Assisted Living. <https://www.levtaniguchi.com/survey-readiness-and-the-mock-survey-process-in-assisted-living/>



Survey Preparation- ALF

- Elements of the Mock Survey Process in Assisted Living
 - Verify that residents on coumadin and digoxin have lab testing completed
 - Ensure that residents self-administering drugs have a monthly assessment

Levine Taniguchi Consulting & Management, Survey Readiness and the Mock Survey Process in Assisted Living. <https://www.levtaniguchi.com/survey-readiness-and-the-mock-survey-process-in-assisted-living/>

Assessment Question 1

1. Which of the following requires an expiration date?
- A. Prescription medications
 - B. Gloves
 - C. Open food items
 - D. A and C
 - E. All of the above

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 - E. All of the above

Survey Preparation- Behavioral

- Follows same audits for medication cart and room as SNF
- Joint commission additional policies
 - Medication safety

The Joint Commission: Nursing Care Center National Patient Safety Goals. Retrieved from https://www.jointcommission.org/wp-content/uploads/2012/02/NCSG_Nursing_Care_Center.pdf

Monthly and Quarterly Reports

- Monthly: chart reviews
- Quarterly: hypnotics
- Antipsychotics: twice in 1st year, separated quarterly, then yearly

Resources

- DOH: licensure holding for all parties
- DEA: controlled substances handling (loss, shortage)
- AHCA/CMS: regulation itself
- SOM: state operating manual
- Joint Commission: improves organization's performance
- ISMP: safe medication practices



Network

Best resource: **OTHER CONSULTANTS!**

Professional Organizations

- American Society of Consultant Pharmacists (ASCP)
 - Devoted to optimal medication management and improved health outcomes for all older adults
- American Society of Health-System Pharmacists (ASHP)
 - Assessment of programs and services followed by customized, best practice-based recommendations for improving an organization’s pharmacy services
- Association for Medication Education (AME)
 - Optimizes medication therapy through education

References

1. Loree Tamayo Consulting & Management. Survey Readiness and the Mock Survey Process in Assisted Living. <http://loreetamayo.com/survey-readiness-and-the-mock-survey-process-in-assisted-living/>
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Preparing Facilities For Surveys
