

Significant Guidance Changes Issued by CMS

CMS has issued advance copies of changes to the Surveyor Interpretive Guidance for [F155](#) (Advance Directives), [F309](#) (Quality of Care) and [F322](#) (Feeding Tubes). This guidance is effective no later than November 30, 2012. In addition CMS has issued an advance copy of the [SOM](#) as it relates to the traditional survey, the new Quality Measures, and certain CMS forms (672, 802). These changes to the SOM will be phased in over the next two months to allow for surveyor training and provider transition to newer MDS software applications. The SOM guidance changes are substantial and we are still digesting the material. Our early read would indicate a strong emphasis on observations and interviews and instruction to review policies and procedures only to verify or corroborate potential concerns.

Also noteworthy, are instructions to the surveyor to determine what efforts are being made to train staff to respond to residents with dementia and to monitor the use of psychopharmacological medications. This would be in keeping with the CMS initiative to reduce these medications for nursing home residents. For the F-tag changes, CMS, as they have done for previous guidance changes, has included an investigative protocol, guidance on scope and severity determination, and a series of training slides for all of the F-tag changes.

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