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MEMORANDUM

TO: RHCF Members

FROM: Elliott Frost, Policy Analyst

DATE: July 15, 2008

SUBJECT: **Revisions to Interpretive Guidelines for Nutrition and Sanitary Conditions**

ROUTE TO: Administrator, Director of Nursing, Director of Food Service, Dietician

ABSTRACT: CMS revises nursing home nutrition and sanitation interpretive guidelines.

The Centers for Medicare and Medicaid Services (CMS) has issued an advance copy of changes to the *Interpretive Guidelines for Long-Term Care Facilities*, for Tags F325 (Nutrition) and F371 (Sanitary Conditions). The revised guidance becomes effective September 1, 2008.

The Survey and Certification Letter (S&C 08-28) issued by CMS provides revised guidance for surveyors in determining compliance with the requirements under Nutrition (F325) and Sanitary Conditions (F371). The changes are not new regulations but new surveyor guidance. Among the changes to the Interpretive Guidelines are the elimination of F326 and the incorporation of guidance into F325 and the elimination of F370 with the incorporation of guidance into F371.

As has been the case with other Interpretive Guideline changes issued by CMS, there is substantial information provided, including clearer clinical definitions and more understandable expectations as to care planning and assessment requirements. The material includes an investigative protocol and a guide to scope and severity determinations. The intent of this material is to ensure greater surveyor consistency in the application of the guidance and in determining compliance. Also included with the guidance changes are a series of training slides outlining the guidance revisions.

S&C Letter 08-28 and the related materials can be accessed from the following link:
<http://www.cms.hhs.gov/SurveyCertificationGenInfo/downloads/SCLetter08-28.pdf>

If you have questions or comments, please contact me at 518-449-2707, ext. 140 or via e-mail at efrost@nyahsa.org.