

THE QUARTERLY CONNECTION

Quarterly Report from Pharma-Care, Inc. / Creative Care Consulting

Fourth Quarter 2020

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CMS to Return to Normal Survey Process

Centers for Medicare and Medicaid Services instructs states to return to normal survey process as soon as possible

AUGUST 18 - Centers for Medicare and Medicaid Services (CMS) issued a Quality, Safety & Oversight (QSO) memo to states today instructing them to return to normal survey process as soon as resources in the state allow and in accordance with states' reopening plans. It also provides guidance on how to resolve pending enforcement actions suspended as a result of prior QSO memos on March 23, 2020 and June 1, 2020 that suspended some survey enforcement actions during the COVID-19 pandemic.

On March 23, 2020, CMS issued the QSO 20-20-All memorandum, which limited survey activity to focused infection control surveys. On June 1, 2020, CMS issued the QSO 20-31-All memorandum that provided survey re-prioritization guidance to transition to more routine oversight and survey activities. This latest memo instructs states to restart all normal surveys as soon as possible.

CMS intends to resolve suspended enforcement cases and provide guidance for closing them out going forward starting today. This process involves four components that are described in the QSO memo:

1. Expanding the Desk Review policy for Plans of Corrections (POCs);
2. Processing enforcement cases that were started **BEFORE** March 23, 2020;
3. Processing enforcement cases that were started **ON** March 23, 2020, **THROUGH** May 31, 2020; and
4. Processing enforcement cases that were started **ON OR AFTER** June 1, 2020.

CMS is also issuing updated guidance for the re-prioritization of routine state survey agency (SA) Clinical Laboratory Improvement Amendments (CLIA) survey activities, subject to the SA's discretion, in addition to lifting the restriction on processing CLIA enforcement actions, and issuing the Statement of Deficiencies and Plan of Correction (Form CMS-2567) for CLIA citations.

Providers with questions about past enforcement actions suspended during the pandemic should contact their state survey agency for guidance as there are many scenarios that may not be fully addressed by this memo.

Per CMS, questions about a specific enforcement cycle may be addressed with the specific CMS location.

1. Long-Term Care questions should be addressed to email at: DNH_Enforcement@cms.hhs.gov
2. CLIA questions should be addressed to email at: LabExcellence@cms.hhs.gov



LTC Facility COVID-19 Testing Requirement

To enhance efforts to keep COVID -19 from entering and spreading through nursing homes, facilities are required to test residents and staff, based on the latest COVID-19 guidance updates.

We realize that CMS and NJ Dept of Health regulations are constantly changing and facilities will have to adjust policies and procedures to accommodate those changes. Therefore, we are asking that you reach out to our pharmacists or email us at info@pharmacareinc.com with your specific requirements so that our consultant pharmacists can make arrangements to gain entry into your facility.

Some facilities are able to test on site, while others will require us to bring a negative test for entry. Several facilities are in phase Zero and would like us to remain remote. Whatever your needs are, please let us know so that we are better able to serve you.



Once again we are in the midst of administering flu vaccines in our facilities. Getting a flu vaccine is more important than ever during 2020-2021 winter season. Routine vaccination should be deferred for persons with suspected or confirmed COVID-19, regardless of symptoms, until criteria have been met for them to discontinue isolation.

Please check your med refrigerators to remove any remaining product from last year's supply. These vials expired on 6/30/2020.

For more information please visit the CDC website at: <https://www.cdc.gov/flu/season/faq-flu-season-2020-2021.htm>.



Pharma-Care, Inc.
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Creative Care Consulting, LLC

Gabapentin is FDA approved for seizures and neuropathic pain.

There has been a rise in the use of gabapentin (Neurontin) over the past several years, both for medical and illicit purposes. Due to the increased use, more adverse events have been recognized, such as serious breathing difficulties. In December 2019, the FDA required a warning be added to the gabapentin prescribing information regarding the risk of serious breathing difficulties. Those most at risk include patients with other respiratory risk factors (such as COPD and other lung diseases), those taking concomitant opioids and other centrally depressing agents, and the elderly.

Two states have now classified gabapentin as a Schedule V substance because of the increase in illicit use as an add-on to heroin, opioids, and cocaine. The FDA has required clinical trials to evaluate abuse potential. Although gabapentin is not a Schedule V substance in NJ (or federally), it might be prudent to be proactive in monitoring your inventory and evaluating the high risk residents for appropriateness of use and dose.

STATE SURVEY TRENDS

Recent post-COVID-19 complaint surveys have been conducted by full teams from the Department of Health and have lasted several days.

- There has been a focus on charting blanks on both paper and electronic MARs. Blanks indicate missed medications, and in some cases have resulted in high level deficiencies.
- The survey teams have also been asking about facility follow-up on the pharmacy consultant reports. Reports are sent the day after the consultant visits your facility. A timely response is expected.

If you have any questions regarding the report, contact your consultant for clarification.

Please make sure that everyone who needs a report is receiving one. The Administrator, DON, and Medical Director should always receive the report from Pharma-Care/Creative Care Consulting. If recipient's email has changed or if there has been a change in staff, please check and update your pharmacy report distribution list.

If there is a corporate representative that wishes to receive a report please provide their name and email. It is only a matter of time before full annual surveys are conducted and it is important that everyone on the clinical team is aware of the issues identified by the pharmacy consultant.

EPIC Corner

ELECTRONIC PHARMACIST INFORMATION CONSULTANT
(MEDICATION REVIEWS WITHIN 48 BUSINESS HOURS)

EPIC Phone: 732-943-3573

EPIC Fax: 732-574-3469 or 3926

Email: epic@pharmacareinc.com

Dear E.P.I.C. Service Users,
I would like to introduce myself. My name is Stella Malouhos and I was appointed the new director of the E.P.I.C. Services department a few months ago. My contact information is listed below. Here, in the EPIC department, we want to ensure efficiency and a smooth workflow for all. There are certain steps that can be taken to achieve this goal:

1. EPIC would like to offer all our EMAR facilities the opportunity to give us access to their system for new and readmitted residents that we do not have access to yet. If you are interested in doing so, please reach out to me and I will let you know what is needed to get started. This would eliminate faxing in the EPIC reviews for *New Admissions* and *Readmissions*. The EPICs will be returned to the facility the same way they have been. **Once access is obtained, please do not continue to fax in requests.**
2. The *Change of Status* EPICs and *Antibiotic Stewardship* EPICs still need to be faxed in.
3. For all facilities that choose not to grant us access or are still on paper MAR, please continue to fill out our cover sheets and provide the information requested.
4. Please make sure your fax machine is set up with a CSID number or telephone number. These will help us be more efficient with tracking incoming reviews and/or returning the EPICs via fax.
5. The turnaround time for completing an EPIC is within 48 business hours of receipt.
6. EPIC wants to ensure that completed EPICs are being faxed to the correct number and/or emails. Please email me a list so we can review and update our address book.
7. Please email the name of the Director of Nursing so we can update this list as well.

Please reach out to me with any questions or concerns.

Thank you,
Stella Malouhos, RPH, CCP
Director of EPIC Services
Consultant Pharmacist

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