

# THE QUARTERLY CONNECTION

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

First Quarter 2018


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## Update on New Phase 2

## Requirements of Participation



**T**he Health Care Association of New Jersey (HCANJ) recently reported that the Survey and Certification Group (S&C) at CMS issued a memo on November 27, 2017 that delays enforcement of some provisions of the new Phase 2 Requirements of Participation, however, not the complete delay that had been sought. Implementation of the new survey process began November 28, 2017.

In summary the first memo, *"Temporary Enforcement Delays for Certain Phase 2 F-Tags and Changes to Nursing Home Compare"*, states that CMS is proceeding with implementing Phase 2 of the Requirements of Participation with the following changes:

- **Temporary moratorium on imposing certain enforcement remedies for specific Phase 2 requirements:** CMS will provide an 18-month moratorium on the use of certain enforcement remedies (CMP, DPNA and discretionary termination) for specific Phase 2 requirements. However, CMS may use directed plans of correction or directed inservices for these specific Phase 2 requirements. This 18-month period will be used to educate facilities about specific new Phase 2 standards.
- **Freeze Health Inspection Star Ratings:** Following the implementation of the new survey process on November 28, 2017, CMS will hold constant the current health inspection star ratings on the Nursing Home Compare website for any surveys occurring between November 28, 2017 and November 27, 2018. There is no change to the staffing or quality measure component and the overall rating can still change based on your staffing and quality measure component.

- **Availability of Survey Findings:** The survey findings of facilities surveyed under the new survey process will be published on Nursing Home Compare, but will not be incorporated into calculations for the Five-Star Quality Rating System for 12 months. CMS will add indicators to Nursing Home Compare that summarize survey findings.
- **Methodological Changes and Changes in Nursing Home Compare:** In early 2018, Nursing Home Compare health inspection star ratings will be based on the two most recent cycles of findings for standard health inspection surveys and the two most recent years of complaint inspection.

CMS has provided the following list of F-Tags included in the 18-month moratorium on use of CMPS:

- F655 (Baseline Care Plan); §483.21(a)(1)-(a)(3)
- F740 (Behavioral Health Services); §483.40F741 (Sufficient/Competent Direct Care/Access Staff-Behavioral Health); §483.40(a)-(a)(2)
- F758 (Psychotropic Medications) related to PRN Limitations §483.45(e)(3)-(e)(5)
- F838 (Facility Assessment); §483.70(e)
- F881 (Antibiotic Stewardship Program); §483.80(a)(3)
- F865 (QAPI Program and Plan) related to the development of the QAPI Plan;
- §483.75(a)(2) and,
- F926 (Smoking Policies). §483.90(i)(5)

### Any Questions?

**For information in the new regulations regarding "Crushing Medications" and "PRN Psychotropic Medications", please contact your Pharma-Care, Inc. consultant pharmacist.**



**Pharma-Care, Inc.**  
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## PCI Employees Donate Five Carloads of Food for Local Food Pantries

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At Pharma-Care, Inc.'s recent Quarterly Staff Meeting, the company and employees donated five carloads of food staples, hats, scarves, and gloves to be distributed from the food pantries of St. Theresa's in Kenilworth and St. Joseph's in Elizabeth. Pictured with part of the haul are from left standing: Barry Heil (*Executive Director of Corporate Operations*); Scott Blumberg (*Chief Executive Officer*); Letitia Winnegrad (*Assistant Director of Operations-South*), Amit Gupta. Sitting from left are Tracy Lao (*State Consultant*); Florence Ojo (*Private Consultant*); Kelly Ambrosino (*Private Consultant*); Rick Corritore (*EPIC Administrator*); and Mark Kana (*State Consultant*).

### EPIC Corner

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

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The recently enacted Mega Rule may seem daunting but it will help ensure residents continue to receive the highest level of care.

Antibiotic Stewardship - the prudent use of antibiotic therapy - is included in the Mega Rule. Overuse or misuse of antibiotics increases microorganism resistance. A resistant microorganism will be difficult to treat if at all.

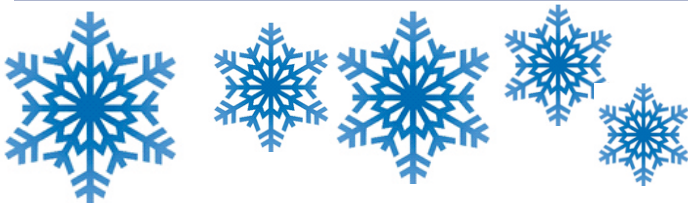
When a resident is administered an antibiotic inappropriately, C.difficile may occur. Antibiotic Stewardship will help to reduce the incidence of C. difficile. Some antibiotics may require dose adjustments based on renal function. There may be incidences of prescribing when renal function is overlooked. The intention of Antibiotic Stewardship is reduction of these problems.

On November 1, 2017, EPIC piloted an Antibiotic Stewardship program. Presently, there is not enough data to share results of the program, however, in a short period of time orders for cultures and serum creatinine levels are increasingly being reported.

A successful Antibiotic Stewardship program will overwhelm the microorganisms -- not your residents.

Should your facility wish to take part in the EPIC Antibiotic Stewardship program, please contact us at the number above.

**WELCOME TO OUR  
NEWEST CLIENTS**  
**Allaire Healthcare Center at  
Morris View**  
**AristaCare at Norwood Terrace**  
**Davita Franklin Park**  
**Dunkirk Dialysis**  
**Inglemoor Rehabilitation & Care  
Center**



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