

Quality of Life and Environment Tag Changes

CMS Division of Nursing Homes
Survey and Certification Group
3/2009

Training Objectives

- Describe changes to the interpretive guidelines for several Quality of Life and Environment Tags
- Describe merging of language regarding closets from two Tags into one, and deletion of Tag 255
- Be able to discuss the change to F371 regarding food brought in by visitors

F172 Access and Visitation Rights

- Adds guidance that facilities must provide 24-hour access to any visitor who is visiting with consent of resident.
- “Reasonable restrictions” regulatory language is defined as those restrictions that keep the home’s residents safe
 - Keeping home locked at night
 - Restricting persons who are disruptive
 - Providing alternate locations for visits (other than bedroom) in order to minimize disruptions to roommate

F175 Married Couples

- Permissive sentence added that this regulation does not prohibit the home from accommodating residents who wish to room with a person of their choice.
- Refers surveyors to F242 Self-determination and Participation for right to make choices.

F241 Dignity

- The definition of Dignity was retained almost verbatim:
 - “Dignity means that in their interactions with residents, staff carry out activities that assist residents to maintain and enhance their self-esteem and self-worth.”
- The original first bullet about grooming was deleted as it crossed over into ADL care. It was replaced with a bullet emphasizing style of grooming according to individual preferences

F241 Dignity (Cont.)

- Second bullet – Language added to **encourage** and assist residents to wear their own clothing **rather than hospital-type gowns**
- Original third bullet of assisting residents to attend activities was deleted as this is covered at F248 Activities
- Third bullet is now current language on dignity in labeling clothing

Dignity (Cont.)

- 4th bullet - refrain from use of bibs (**also known as clothing protectors**) instead of napkins (**except by resident choice**), refrain from standing over resident while assisting to eat, and from ignoring residents while giving care
- 5th bullet – respecting residents' space, not changing radio or TV station to suit staff, knocking, keeping belongings were resident likes them

Dignity (Cont.)

- 6th bullet – addresses speaking respectfully to residents, focusing on them as individuals and addressing them as individuals. A clarification to the mostly existing language here is the addition of **avoiding the use of labels for residents such as “feeders”**

F241 Dignity (Cont.)

- 7th bullet addresses use of signage in bedrooms and where public can view
 - Not compliant to place signage with confidential resident information where it can be readily seen by visitors and other residents
 - Clarifies resident names on doors and resident memorabilia are allowable with consent
 - Addresses CDC signage for infection control

F241 Dignity (Cont.)

- 8th bullet covers privacy of body while residents are in public areas
 - Keeping residents sufficiently covered when in public
 - Adds guidance on when to use F241 for bodily privacy and when to use F164

F241 Dignity (Cont.)

- Final bullet covers demeaning practices – examples include:
 - Uncovered urinary catheter bags
 - Refusing to comply with a resident's request to receive toileting assistance during meal times
 - Restricting residents from use of common area restrooms
 - Exception made for certain restrooms and for residents who are restricted from common areas

F241 Dignity (Procedures)

- Additions have been made to the Procedures section to have surveyors take note of interactions between staff and residents, grooming issues, keeping residents clean, restrictions from common areas or restrooms in these areas

F241 Dignity (Procedures)

- Note whether staff are verbalizing confidential resident information in locations where it can be overheard by other residents or the public
- Note if staff are attempting to address “agenda” behavior in a dignified manner

F242 Self-Determination and Participation

- The regulation has always contained the following rights to make choices over:
 - Activities
 - Schedules
 - Health care
 - Interactions with members of the community
 - Aspects of his or her life that are significant to the resident
- New language clarifies some of these choices
- Intent adds language for home to actively seek resident preferences in order to help them fulfill their choices

F242 Self-Determination and Participation (Cont.)

- Guidelines specify citation of deficiencies regarding failure to meet activity needs, including choices over activities, should be at F248, Activities
- Choices over schedules is specified to include schedules of waking, eating, bathing, and going to bed at night, as well as health care schedules

F242 Self-Determination and Participation (Cont.)

- Language has been added to make it clear that choice over health care extends to method of bathing (bath, shower, in-bed method) as well as to timing
- Note has been added to direct surveyors to F246 Accommodation of Needs for choices over arrangement of furniture and adaptations to bedroom and bathroom

F242 Self-Determination and Participation (Cont.)

- Language is added regarding the right to make choices over matters that are significant, that one example is choosing to room with a person of the resident's choice
- This echoes the language written at Tag 175 Married Couples that directs surveyors to F242 for issues regarding this choice of roommate. F175 only covers spouses.

F242 Self-Determination and Participation (Procedures)

- Language is added to note during interviews if there are issues with residents being prevented from exercising their rights to choices over schedules
- If there are issues, has the home actively sought information about preferences and choices and attempted to accommodate them

F246 Accommodation of Needs

- Guidelines stress that this tag's focus should be on the physical environment
 - Bedroom, bathroom plus some degree of individualization in common areas
- Language added that facility should be accommodating **NEEDS** and preferences
 - Facility needs to assess both needs and preferences of each resident and accommodate to extent reasonable, so long as others are not endangered

F246 Accom. of Needs (Cont.)

- Note is added to refer surveyors to F241 Dignity for issues regarding the psychosocial environment, that is, the atmosphere of the home in terms of staff behaviors

F246 Accom. of Needs (Cont.)

- Specifics provided about individualizing the bedroom and bathroom to assist resident to:
 - Open/close drawers, turn faucets on/off
 - See self in bathroom mirror, have toiletries at hand
 - Open/close doors, operate room lighting
 - Use bathroom facilities (access grab bars, etc.)
 - Other – use call bell, turn table light on/off

F246 Accom. of Needs (Cont.)

- Note has been added to direct surveyors to F461 for closet issues and lack of needed furniture. Regulatory text regarding closets had been split into Quality of Life and Environment sections, but language at F255 has been moved to F461 and the F255 tag deleted.
- Guidance covers sufficient electrical outlets, comfortable seating, task lighting, furniture arrangement

F246 Accom. of Needs (Cont.)

- Facility should furnish common areas with furniture that enhances residents' abilities to maintain their independence in sitting down and arising, and should strive to accommodate residents of different heights through different sizes and types of seating choices.
- Note added to direct surveyors to Dignity and to Lighting for certain issues

F246 Accom. of Needs (Cont.)

- Next par. stresses the concept of reasonableness and includes residents having needed items such as toiletries at hand, adaptive equipment added (door handle gripper) where needed, furniture arranged to accommodate needs and preferences
- Last par. stresses staff interactions to accommodate visual and hearing deficits



F246 Accom. of Needs - Procedures

- Surveyors should observe residents in their rooms and in common areas and should interview residents to note if needs and preferences are being accommodated to the extent reasonable
- Some specifics from the Guidance are covered as things to observe and ask about
- Do outdoor smoking areas accommodate residents?

F247 Room/Roommate Change

- Reg. language: Receive notice before the resident's room or roommate in the facility is changed.
- Guidance added to make this more specific and to encourage home to be sensitive to resident needs when moving to a new room or getting a new roommate

F252 Environment

- Examples of places frequented by residents has been expanded – with addition of dining areas, lobby, outdoor patios
- Text is added to explain intent of the word “homelike” in the reg. language – close to that of the environment of a private home as possible, eliminating odors and institutional practices as much as possible

F252 Environment (Cont.)

- Institutional practices that homes should strive to eliminate
 - Overhead paging (this language has been there since 1990)
 - Meals served on trays in dining room
 - Institutional signage labeling rooms
 - Medication carts
 - Widespread use of audible seat and bed alarms
 - Mass purchased furniture
 - Nursing stations
- Most homes can't eliminate these quickly, this is a goal rather than a regulatory mandate

F252 Environment (Cont.)

- Part of creating a homelike environment is emphasizing individualization, relationships, and a welcoming atmosphere that makes residents comfortable
- Homes where residents stay a short time would also benefit from elimination of institutional practices. These residents will not likely want to bring in major furniture items but may want their TV, chair, etc.

F252 Environment (Cont.)

- Although regulatory language is “safe, clean, comfortable, and homelike environment” there are more specific Tags that are preferable for some of these issues
 - For safety, use F323 Accidents
 - For fire danger, use F454 Life Safety from Fire
 - For cleanliness, use F253 Housekeeping and Maintenance
 - For cleanliness of staff areas, use F465 Other Environmental Conditions
 - For lighting, temperature, and noise, use those Tags

F252 Procedures

- Ask residents and families whether they think the home is trying to be as homelike as possible, and observe for personalization
- If potential problems arise, ask staff what they have done to provide homelike environment
- Some residents there for short stay may not wish to bring belongings

F256 Lighting

- Reg. language addresses both adequate and comfortable lighting
- Describes features of adequate lighting design
 - Sufficient light with minimal glare
 - Even light levels in common areas
 - Use of daylight as much as possible
 - Elimination of glare from shiny floors and unshielded windows

F256 Lighting (Cont.)

- More features of adequate lighting design:
 - Extra lighting available for tasks – table or floor lamps
 - Wayfinding light to help residents find their way to their bathroom at night
 - Dimmers where possible and where resident desires them gives more control over light level
 - Staff can also use them for care at night
 - Some homes cannot make lighting changes due to voltage or wiring issues

F256 Lighting (Cont.)

- Guidance advises facilities to consult lighting guidance from the authoritative source – the Illuminating Engineering Society of North America
- Guidance also addresses additional issues of helping residents to see better
 - Contrasting colors between
 - Floor/baseboard
 - Bathroom fixtures/walls
 - Dishes/table

F256 Procedures

- **Ask residents if they have sufficient lighting, in all areas they frequent**
 - If they need task lighting, is it available
 - Are there any glare problems at any time of day
 - Can they find their way to the bathroom at night (for resident capable of this)
 - Are they troubled by staff turning on room overhead lights to provide care at night
- Observe residents and ask staff about issues

F371 Sanitary Conditions

- Recent release of new guidance at this Tag has caused some questions about residents accepting food from visitors
- We are revising a sentence at this Tag to make it clear that this reg. concerns facility procurement and does not limit the rights of residents to accept food from visitors.

F461 Resident Rooms

- Updated LSC reference to 2000 Edition
- Language from LSC added for windows
 - Sill height not to exceed 36 inches
 - Window may be operable
- Floor at grade level clarified
- Closet reg. language from 483.15, F255 brought to this Tag and F255 deleted

F461 Rooms (Cont.)

- Surveyors are referred to F246 for furniture arrangement
- Closet space guidance and probes from F255 brought to F461

F463 Call System

- Language has been added to address homes that do not have nursing stations and homes that use wireless systems