

Facility Assessment: Policy and Procedure Evaluation Process

LeadingAge[®]



**PATHWAY
HEALTH**
Insight | Expertise | Knowledge

LeadingAge[®]
Illinois

Facility Assessment: Policy and Procedure Evaluation

Reference F Tag

F838 §483.70(e) Facility assessment.

The facility must conduct and document a facility-wide assessment to determine what resources are necessary to care for its residents competently during both day-to-day operations and emergencies. The facility must review and update that assessment, as necessary, and at least annually. The facility must also review and update this assessment whenever there is, or the facility plans for, any change that would require a substantial modification to any part of this assessment.

Guidance

The assessment must include or address an evaluation of the facility's training program to ensure any training needs are met for all new and existing staff, individuals providing services under a contractual arrangement, and volunteers, consistent with their expected roles. The assessment should also include an evaluation of what policies and procedures may be required in the provision of care and that these meet current professional standards of practice. If there are any concerns regarding training refer to §483.95 Training.

INTENT OF POLICY AND PROCEDURE PROCESS

The intent of this element of the facility assessment reflects the need for a facility to evaluate their policies and procedures that may be required to direct the provision of care. The policies need to meet current professional standards of practice.

POLICY AND PROCEDURE REVISION AND REVIEW

Evaluating the facility's policies and procedures that correlate to clinical and resident care practices is recommended to be part of the quality assurance and performance improvement (QAPI) process, annually or as needed. This process should include the following:

- Evaluation process
- Development based on the reference to evidence based standard of practice
- Determination of when new or updated policies are required
- Approval process for policies
- Training plan for new or revised policies

HOW TO INCORPORATE INTO THE FACILITY ASSESSMENT

Per **§483.70(e)**, the facility assessment must include or address an evaluation of the facility's policies and procedures as it relates to the care and services provided to the resident population as indicated in the requirements.

Therefore, it is important to:

- Develop a policy and procedure revision process which is incorporated into the QAPI plan
- Use the information to answer the questions:
 - How does the facility review and revise policies and procedures required for the provision of care?
 - How do we ensure that those policies meet current professional standards of practice?
 - What is our process in determining the need for a new policy or revision of a policy required for the provision of care and service?
- Incorporate your processes into your QAPI plan.
- Monitor the facility assessment annually or upon a change in the facility's operation that would require a substantial modification in the assessment and adjust the policy and procedure revision process accordingly.
- Write a narrative description of the facility's process to evaluate what policies and procedures may be required in the provision of care and services and how the facility will add new policies or revise policies based upon resident population needs and standards of practice.
- See the Facility Assessment Template.

See the Facility Assessment Template SAMPLE related to the inclusion of the necessary information obtained via this process for the completion of the Facility Assessment.



References

State Operations Manual (SOM) Appendix PP for Phase 2, F-Tag Revisions, and Related Issues

www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Downloads/Advance-Appendix-PP-Including-Phase-2-.pdf

Quality Improvement Organizations, Facility Assessment Tool (2017),

<http://qioprogram.org/facility-assessment-tool>

This document is for general informational purposes only.

It does not represent legal advice nor relied upon as supporting documentation or advice with CMS or other regulatory entities.
© Pathway Health Services, Inc. – All Rights Reserved – Copy with Permission Only – The RoP Facility Assessment Toolkit - 2017