# Facility Assessment: Health Information Technology











# **Facility Assessment: Health Information Technology**

# **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. The facility assessment must address or include:

§483.70(e)(1) The facility's resident population, including, but not limited to,

- (i) Both the number of residents and the facility's resident capacity;
- (ii) The care required by the resident population considering the types of diseases, conditions, physical and cognitive disabilities, overall acuity, and other pertinent facts that are present within that population;
- (iii) The staff competencies that are necessary to provide the level and types of care needed for the resident population;
- (iv) The physical environment, equipment, services, and other physical plant considerations that are necessary to care for this population; and
- (v) Any ethnic, cultural, or religious factors that may potentially affect the care provided by the facility, including, but not limited to, activities and food and nutrition services.

§483.70(e)(2) The facility's resources, including but not limited to,

- (i) All buildings and/or other physical structures and vehicles;
- (ii) Equipment (medical and non- medical);
- (iii) Services provided, such as physical therapy, pharmacy, and specific rehabilitation therapies;
- (iv) All personnel, including managers, staff (both employees and those who provide services under contract), and volunteers, as well as their education and/or training and any competencies related to resident care;
- (v) Contracts, memorandums of understanding, or other agreements with third parties to provide services or equipment to the facility during both normal operations and emergencies; and
- (vi) Health information technology resources, such as systems for electronically managing patient records and electronically sharing information with other organizations.





§483.70(e)(3) A facility-based and community-based risk assessment, utilizing an all-hazards approach.

The facility's health information technology resources, such as systems for electronically managing patient records and electronically sharing information with other organizations.

- The types of systems are used to manage resident health information
- How the facility will securely transfer health information to a hospital, home health agency, or other providers for any resident transferred or discharged from the facility

# INTENT OF THE HEALTH INFORMATION TECHNOLOGY SECTION

The intent of the health information technology section of the facility assessment is for the facility to evaluate its health information technology resources to ensure that resident protected health information is managed in a secure environment and how the facility will transfer health information to other providers utilizing health information exchange.

# **How Health Information is Managed**

A nursing home may utilize several different types of technology to manage health information. Besides the electronic health record there may be other systems used such as point of care documentation software for documenting activities of daily living, billing software, risk management software, pharmacy software for drug regimen review, referral management software, skin and wound care software, therapy services software, MDS/RAI software and others.

Consider that the Facility Assessment is designed to guide us in an evaluation of the facility needs as they relate to the health information technology resources available at the facility and what resources the facility is lacking or may need to obtain.

# PROCESS: DETERMINE AND IDENTIFY HEALTH INFORMATION TECHNOLOGY RESOURCES

- 1. Review the facility inventory to identify the facility resources for health information technology.
- 2. List the health information technology resources on the data collection tool.
  - a. Example: systems for electronically managing patient records and electronically sharing information with other organizations.
  - Remember to correlate the technology list with the facility Emergency Preparedness Plan
- 3. Write a narrative description of your electronic health record system.





- 4. Describe any other types of software used to manage resident health information. Description of:
  - a) how the facility will securely transfer health information to a hospital, home health agency, or other providers for any resident transferred or discharged from the facility;
  - b) how downtime procedures are developed and implemented; and
  - c) how the facility ensures that residents and their representative can access their records upon request and obtain copies within required timeframes.
- 5. Write a narrative description of the facility's health information exchange program if utilized, adding information on HIPAA security policies, software and hardware testing that has been completed to ensure a secure environment.

### HOW TO INCORPORATE INTO THE FACILITY ASSESSMENT

Per §483.70(e), the facility assessment must include or address an evaluation of the facility's health information technology resources as indicated in the requirements. Therefore, it is important to:

- Gather the necessary information as indicated above
- Use the information to answer the questions:
  - How do we manage patient records in our organization such as what type of electronic health record software do we use?
  - o Are we paper, electronic or a combination of both?
  - o If we participate in HIE, what is our system for electronically sharing HI with other organizations?
- 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 facility training plan accordingly.
- Write a narrative description of the facility's health information technology resources for inclusion, see below, into the narrative Facility Assessment. 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 <a href="https://www.cms.gov/Medicare/Provider-Enrollment-and-">www.cms.gov/Medicare/Provider-Enrollment-and-</a>

<u>Certification/GuidanceforLawsAndRegulations/Downloads/Advance-Appendix-PP-Including-Phase-2-.pdf</u>

# **CMS – EHR Incentive Programs**

https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/2016ProgramRequirements.html

# **HIPAA Security Rule**

https://www.hhs.gov/hipaa/for-professionals/security/laws-regulations/index.html

Guide to Reducing Unintended Consequences of Electronic Health Records <a href="https://www.healthit.gov/unintended-consequences/">https://www.healthit.gov/unintended-consequences/</a>

Quality Improvement Organizations, Facility Assessment Tool (2017), http://qioprogram.org/facility-assessment-tool