

Bed Hold and Return to Facility



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Objectives

Participants will:

- Understand the regulation that guide our practices regarding Bed Hold and Return to the Facility.
- Understand bed hold notice responsibilities of the facility.
- Understand facility requirements to permit the resident to return to the facility after hospitalization or leave of absence.

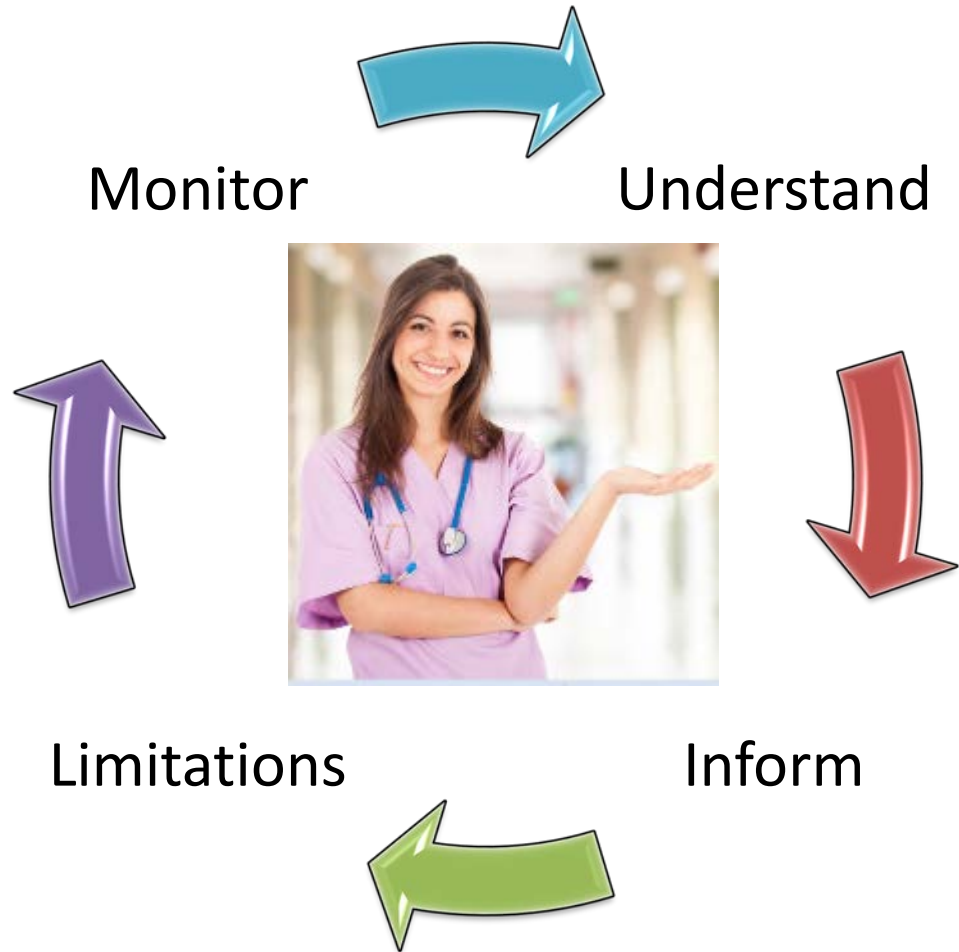
Introduction / Purpose of Education

- The nursing home Requirements of Participation (RoP) are the regulations that set minimum standards for nursing homes.
- The Requirements of Participation (RoP) were rewritten in October 2016.
- The changes in regulations go into effect over the next three years, in three phases.
- There were changes made to the regulations for Admissions.



Facility Response

- Understand
- Inform
- Limitations
- Monitor



Understand - Bed Hold

- What is Bed Hold?
 - Current resident leaves the facility
 - Emergency
 - Scheduled hospital or medical need
 - Therapeutic leave

www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/downloads/R1522CP.pdf

Regarding Medicare Claims Processing Manual Chpt 1 –General Billing Requirements

Understand - Bed Hold

- What is Bed Hold?
 - Current resident leaves the facility
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www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/downloads/R1522CP.pdf

Regarding Medicare Claims Processing Manual Chpt 1 –General Billing Requirements

Understand - Bed Hold

- What is Bed Hold?
 - Resident Space is maintained
 - Billing per State and Federal Guidance



www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/downloads/R1522CP.pdf

Regarding Medicare Claims Processing Manual Chpt 1 –General Billing Requirements

Understand - Bed Hold

- The facility must inform residents in advance of their option to make bed-hold payments, as well as the amount of the facility's charge.



www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/downloads/R1522CP.pdf

Regarding Medicare Claims Processing Manual Cpt 1 –General Billing Requirements

Inform – Bed-Hold Notices

Notice Before Transfer

Before a nursing facility transfers a resident to a hospital or the resident goes on therapeutic leave, the nursing facility must provide written information to the resident or resident representative that specifies—



Inform – Bed-Hold Notices

Notice Upon Transfer

The facility will provide the resident and resident representative a written notice which specifies the duration of the bed-hold policy at the time of transfer for hospitalization or therapeutic leave.



Inform – Bed-Hold Notices

- **Days**
- **Payment**

State by state bed hold information is available from the LTC Ombudsman .org website



<http://ltcombudsman.org/uploads/files/library/state-bedhold-chart-oct2012.pdf>

Inform - Policy

- Facility must have a policy
 - Notices
 - Bed Hold Rates
 - Timing of Notice
 - Admission
 - Pre Transfer
 - Time of Transfer
 - Bed Hold Period
 - Bed hold rate
 - Readmission



Considerations for Bed Hold

- When a resident is absent on a bed-hold, their personal belongings need to be secured as well as their room location.
- Even if the facility cannot charge Medicaid for the bed hold, the resident covered by Medicaid is allowed to hold the bed for the number of days allowed by the State plan.

F 205 Notice of Bed hold policy and return –CMS State Operation Manual –
Guidance to Surveyors draft November 9, 2016



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Considerations for Bed Hold

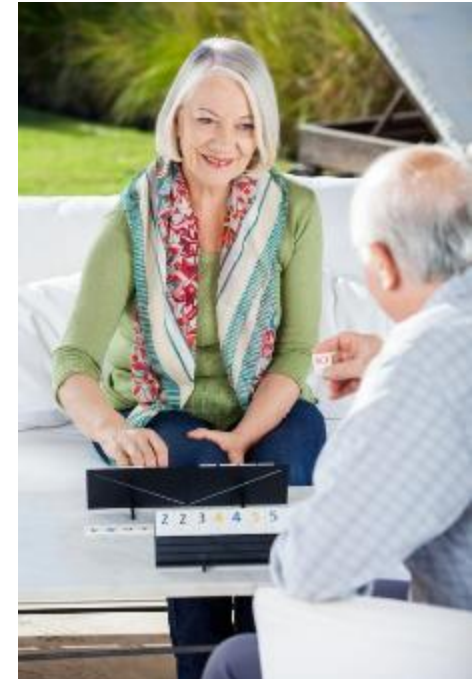
- The Guidance to surveyors allows for two notices of bed hold to be provided; one at admission and one at the time of the transfer.
- If the State plan changes, the bed hold notice would need to be reissued.



F 205 Notice of Bed hold policy and return –CMS State Operation Manual –
Guidance to Surveyors draft November 9, 2016

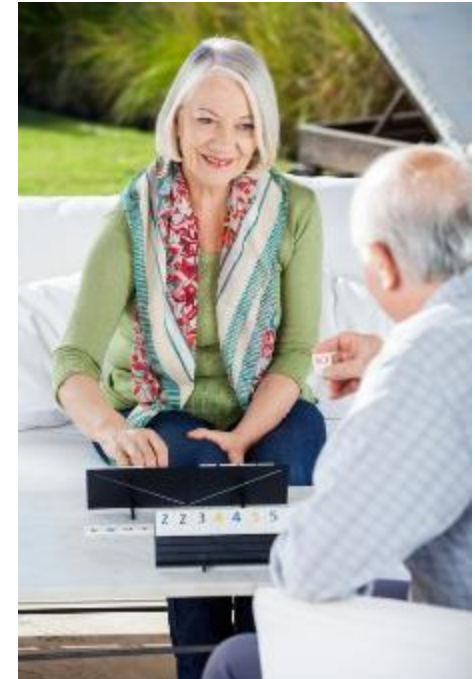
Considerations for Bed Hold

- Insert Facility/State Specific Guidelines
- Emergency transfer
 - Notice process
 - Timing of Notice
- The requirement is met
 - Hospital paperwork
- Do we give notice for every time a resident leaves the facility?



Considerations for Bed Hold

- Residents may elect to pay privately for bed hold
 - Did not choose, allowed to return
- Non-Medicaid residents may be requested to pay for all days of bed-hold.



Considerations for Bed Hold

- Document in the record
 - Bed hold notice was issued, to whom
 - Date and time.
- Integrate the information into the progress note written by the nurse at the time of transfer
- Notice to representative



Overview of the Regulations

(e)(1) Permitting residents to return to facility.

- A facility must establish and follow a **written policy** on permitting residents **to return to the facility** after they are hospitalized or placed on therapeutic leave. The policy must provide for the following.
- (i) A resident, whose hospitalization or therapeutic **leave exceeds** the bed hold period under the State plan, returns to the facility to their previous room if available or immediately upon the first availability of a bed in a semiprivate room if the resident
 - (A) Requires the services provided by the facility; and
 - (B) Is eligible for Medicare skilled nursing facility services or Medicaid nursing facility services.

Overview of the Regulations

- “First available bed in a semi-private room” means a bed in a room shared with another resident of the same sex. *(except when spouses share a room)*



Composite Distinct Part

- Composite distinct part – noncontiguous rooms or components of the facility that are not located within the same campus.
- Segregate residents by payment source or on a basis other than care needs is prohibited.



Overview of the Regulation

- ***(2) Readmission to a composite distinct part.***
- When the facility to which a resident returns is a composite distinct part (as defined in § 483.5), the resident must be **permitted to return** to an **available bed** in the particular location of the composite distinct part in which he or she resided previously.



Overview of the Regulation

- ***(2) Readmission to a composite distinct part.***
- If a bed is not available in that location at the time of return, the resident must be given the option to return to that location upon the first availability of a bed there.



Considerations for Return Facility Policy

- Surveyors will review the bed hold or return to facility policy.
- Surveyors may interview the local ombudsman to determine if there have been any issues with bed hold or return



Considerations for Return Facility Policy

- Social workers may be interviewed about the facility's policy and process.
- Hospital discharge planners may be interviewed if a problem was identified by the above.



Inform - Return to Facility

- Remain in contact
 - Resident
 - Resident Representative
- Readmission assessment
 - Plan for their care needs
 - Ensure that the facility can meet their needs



Limitations

- Beyond Bed Hold Period
- Cannot meet the resident needs
- Next steps



Considerations for Return to Facility Policy

- Describe how the facility will follow its discharge notice policy and procedure if the resident cannot return to the facility.



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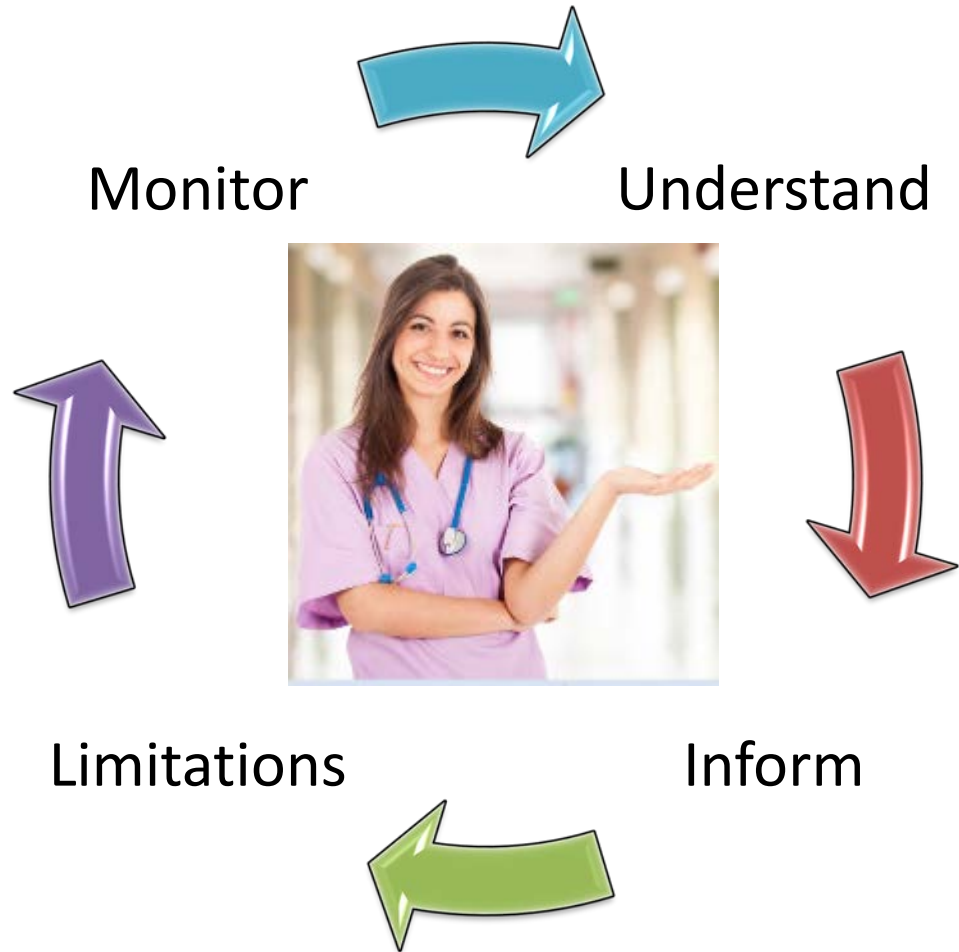
Monitor

- Bed Hold Notices
- Admission/Readmission
- Interviews
- Education
- Problem/Concern Process
- Observations
- QAPI



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Questions?



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REFERENCES

Medicare and Medicaid Programs; Reform of Requirements for Long-Term Care Facilities 10/04/16:

<https://www.federalregister.gov/documents/2016/10/04/2016-23503/medicare-and-medicaid-programs-reform-of-requirements-for-long-term-care-facilities>

CMS Memo Ref: S&C 17-07-NH: Advance Copy – Revisions to State Operations Manual (SOM), Appendix PP- Revised Regulations and Tags, 11/09/16:

<https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-17-07.pdf>



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THANK YOU FOR PARTICIPATING IN THIS EDUCATION SESSION!



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