

# Bed Rail & Inspection Policy and Procedure Checklist

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## **Tool: Bed Rail & Bed Inspection Policy and Procedure Checklist**

### **Purpose and Intent of Bed Rail Assessment (483.20) and Bed Inspection (483.90)**

The purpose of the bed rail assessment and bed inspection policies is to ensure the facility provides an environment that is as free of accidents and hazards as possible and to make sure the facility uses the least restrictive devices possible. This includes:

- Identifying hazard and risk
- Evaluating and analyzing hazard and risk
- Implementing alternative interventions to reduce hazard and risk
- Monitoring for effectiveness and modifying interventions when necessary
- Preventing an avoidable accident
- Monitoring the effectiveness of the interventions and modifying as necessary in accordance with current standards of practice

To aid in the development and implementation of a comprehensive bed inspection policy and bed rail assessment in accordance to the new Requirements of Participation, (RoP), the following checklist captures specific action items for successful completion. The far left column represents the actual Requirements of Participation (RoP) language and the right column indicates specific leadership strategies for successful completion and implementation of the revised RoP. When preparing updated policies and procedures, it is recommended to include actual RoP language as applicable.

Please note that CMS has not issued its interpretative guidance for the new Requirements of Participation (RoP), therefore additional updates may be necessary once the guidance is released.



**Suggested Checklist: Bed Rail Assessment & Bed Inspection Policies and Procedures**

Regulation	Recommended Actions
<p>The facility must-</p> <p>(1) Conduct regular bed inspections of bed frames, mattresses, and rails as part of a regular maintenance program.</p>	<p><input type="checkbox"/> Review, revise and institute a Bed Inspection Policy and Procedure in accordance with the new RoP. See regulatory requirements as well as template policy and procedure.</p> <p><input type="checkbox"/> Conduct Maintenance and Management training on the revised Bed Inspection Policy and Procedure, and the FDA’s Potential Zones of Entrapment.</p> <p><input type="checkbox"/> Review Preventative Maintenance Program to include updated bed inspection requirements and definitions</p> <p><input type="checkbox"/> Review admission and readmission process to include updated bed inspection requirements and definitions</p>
<p>(2) Ensure bed inspections include evaluation of potential entrapment risks as defined in the Food and Drug Administration’s (FDAs) Potential Zones of Entrapment. (Note: Zones 1 through 4 includes evidence-based dimensions aimed to reduce the risk of entrapment.)</p>	<p><input type="checkbox"/> Maintain record of regular bed inspections, including documentation of risks and areas of possible entrapment, as well as subsequent appropriate modification(s).</p> <p><input type="checkbox"/> Include confirmation of measurements per Bed Inspection Audit, in accordance with each specific zone of the FDA’s Potential Zones of Entrapment.</p> <p><input type="checkbox"/> Review Preventative Maintenance Program to include updated bed inspection requirements and definitions</p>

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<p>(3) Ensure that bed inspection demonstrates evidence that bed's dimensions are appropriate for the resident's size and weight.</p>	<p><input type="checkbox"/> Consult manufacturer's specifications and recommendations to affirm appropriateness of bed's dimensions v. resident's size and weight.</p> <p><input type="checkbox"/> Review admission and readmission process to include updated bed inspection requirements and definitions</p> <p><input type="checkbox"/> Document verification of same per Bed Inspection Audit.</p>
<p>(4) Ensure bed inspections demonstrate evidence of following manufacturer's recommendations and specifications for installing and maintaining bed rails and other accessories, as applicable.</p>	<p><input type="checkbox"/> Install and maintain bed rails and other accessories per manufacturer's recommendations and specifications.</p> <p><input type="checkbox"/> Document evidence of compliance with manufacturer's recommendations and specifications per Bed Inventory Form and Bed Inspection Audit.</p> <p><input type="checkbox"/> Recommend retaining manufacturer's guidelines for future reference, and to bolster evidence of compliance.</p> <p><input type="checkbox"/> Review Preventative Maintenance Program to include updated bed inspection requirements and definitions and manufacture's recommendations and specifications. Include in facility Equipment Management Program</p>

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Regulation	Recommended Actions
<p>(5) Ensure the rails, mattress, and frame are compatible when bed rails and mattresses are used and purchased separately from the bed frame.</p>	<p><input type="checkbox"/> Verify compatibility of bed rails, mattress, and bed frame per manufacturer’s recommendations and specifications.</p> <p><input type="checkbox"/> Document verification as evidence of compliance per Bed Inventory Form and Bed Inspection Audit.</p> <p><input type="checkbox"/> Assemble bed systems, ensuring compatibility of attachments, per manufacturer’s recommendations and specifications.</p> <p><input type="checkbox"/> Retain manufacturer’s recommendations and specifications for future reference, and to support evidence of compliance.</p> <p><input type="checkbox"/> Review physical device assessments to include updated bed rail assessment requirements – see bed rail assessment template for reference</p>
<p>(6) Ensure timely identification and correction of bed components that demonstrate evidence of disrepair (e.g. loose fittings, missing screws or bolts, non-locking brakes or rail(s), surface cracks or chips, etc.)</p>	<p><input type="checkbox"/> Document evidence of bed inspections that demonstrates timely identification and correction of visible signs of disrepair.</p> <p><input type="checkbox"/> Recommend attaching pertinent invoices to bed inspection audit as evidence of compliance with this requirement.</p>
<p>(7) Ensure bed controls or handset are fully operational within manufacturer’s recommendations and guidelines.</p>	<p><input type="checkbox"/> Document confirmation that bed control or handset is fully operational within manufacturer’s recommendations and guidelines, per Bed Inspection Audit.</p>
<p>(n) <i>Bed rails.</i> The facility must attempt to use appropriate alternatives prior to installing a side or bed rail. If a bed or side rail is used,</p>	<p><input type="checkbox"/> Review and revise the facility’s physical device, restraint or bed rail assessment to include an assessment of the risk of resident entrapment.</p>



Regulation	Recommended Actions
<p>the facility must ensure correct installation, use, and maintenance of bed rails, including but not limited to the following elements.</p> <ul style="list-style-type: none"> <li>(1) Assess the resident for risk of entrapment from bed rails prior to installation.</li> <li>(2) Review the risks and benefits of bed rails with the resident or resident representative and obtain informed consent prior to installation.</li> <li>(3) Ensure that the bed’s dimensions are appropriate for the resident’s size and weight.</li> <li>(4) Follow the manufacturers’ recommendations and specifications for:               <ul style="list-style-type: none"> <li>(1) Installing and maintaining bed rails.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review and revise the informed consent process to include a description of any potential risks for a resident using a bed rail and the process for educating the resident and representative to obtain informed consent for use.</li> <li><input type="checkbox"/> Review and revise the facility’s safety assessment to include an assessment of the appropriateness of bed dimensions based on the individual resident’s size and weight.</li> <li><input type="checkbox"/> Review and revise the facility’s care planning process to include a description of the risks of bed rail use for an individual resident and interventions to minimize the risk and monitor the resident for safety.</li> <li><input type="checkbox"/> Review and revise the facility’s policy and process for obtaining manufacturer’s directions for installing and maintaining bedrails and how and where that information is made available to maintenance and nursing staff.</li> <li><input type="checkbox"/> Complete an audit of current residents’ bed rail use. Engage maintenance and therapy staff to evaluate the risks associated with each resident’s use of the rail. Follow the facility policy and procedure for assessment, consent and care planning.</li> </ul>

The below areas serves as a cross reference for facility leaders to conduct addition policy and procedure review across departments to incorporate the changes set forth in 483.20 (Bed Rail Assessment) and 483.90 (Bed Inspection). This listing is not all encompassing however should serve as a resource for leaders as they update their internal policies, procedures and operational processes.



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CMS Definitions

Employee Orientation – Professional/Licensed Nurses

Staff Training and Education

Incident Accident Policy and Procedure

Behavior Management

Physical Device and Chemical Restraint Policy and Procedure

Preventative Maintenance Program

Equipment Management Program

Facility Wide Resource Assessment – Phase II

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