



Center for Clinical Standards and Quality/Survey & Certification Group

Ref: S&C: 16-15-NH

DATE: March 25, 2016

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: State Operations Manual (SOM) Surveyor Guidance Revisions Related to Psychosocial Harm in Nursing Homes

Memorandum Summary

- **F329 Draft Revision:** The Centers for Medicare & Medicaid Services (CMS) has revised guidance to surveyors in Appendix PP of the SOM under F329 to enhance ease of use for surveyors and to include language related to how unnecessary use of medications may cause psychosocial harm to residents.
- **Psychosocial Outcome Severity Guide:** CMS has revised language in the Psychosocial Outcome Severity Guide in Appendix P of the SOM.
- **Revisions to Selected F tags:** CMS has added language to selected F tags to emphasize the risk of psychosocial harm associated with noncompliance with specific regulations.
- The regulatory language remains unchanged.

Background

In 2006, CMS issued the Psychosocial Outcome Severity Guide in Appendix P of the SOM. The guide provided instructions, definitions, and criteria to help surveyors determine the correct levels of negative psychosocial outcomes that developed, continued, or worsened because of a facility's noncompliance. While surveyors currently cite instances of psychosocial harm, CMS believes these revisions will help guide surveyors to identify psychosocial harm or potential harm. The revisions also support activities or actions to improve resident safety and increase quality and reliability of care for better outcomes.

Psychosocial Harm Revisions

The CMS has revised guidance at F329 in Appendix PP. Revisions include:

- Removing medication tables to make F329 easier to use.
- Replacing medication tables with up-to-date medication resources.
- Revising Deficiency Categorization examples to show that noncompliance at F329 can cause significant psychosocial harm.

The CMS requested feedback from surveyors about the medication tables. While the tables contain useful information, they have not been routinely updated and CMS determined that providing up-to-date medication resources would be more helpful to surveyors. The new resources provide information on use, side effects, adverse consequences, drug classifications, and interactions. Additionally, some of the current deficiency categorization examples show a combination of psychosocial and physical harm. The revised examples show how surveyors may cite F329 when psychosocial harm alone occurs.

The CMS has also added language to other F tags listed below. While surveyors may find negative psychosocial outcomes related to any regulations, these areas may be more susceptible to a negative psychosocial outcome or contain a psychosocial element that may be greater in severity than the physical outcome:

- F221/222
- F223/224/225/226
- F241
- F242
- F246
- F248
- F250
- F310
- F320
- F353

The new language in each tag emphasizes the risk of psychosocial harm associated with noncompliance at specific regulations and refers surveyors to the Psychosocial Outcome Severity Guide.

Lastly, language has been added to the Psychosocial Outcome Severity Guide in Appendix P to reference F tags where residents may be more at risk for actual or potential psychosocial harm.

Contact: Please forward any questions regarding this memorandum or the guidance revisions to the CMS DNH triage team, DNH_TriageTeam@cms.hhs.gov.

Effective Date: Immediately. This policy should be communicated with all survey and certification staff, their managers and the State/Regional Office training coordinators within 30 days of this memorandum. The contents of this letter supports activities or actions to improve resident safety and increase quality and reliability of care for better outcomes.

/s/

Thomas E. Hamilton

Attachment (s)-

Advanced Copy SOM Appendix PP Psychosocial Harm in Nursing Homes

Advanced Copy SOM F329PSRevision

Advanced Copy SOM PS harmtags

cc: Survey and Certification Regional Office Management