

Requirements of Participation: Preparing for Phase 3

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Overview

New requirements go live on November 28, 2019

- implementation of those elements that are more complex and may involve hiring or physical construction

New Requirements

483.12(b)(4)

- Abuse prevention P&P that coordinate QAPI program
- Must coordinate QAPI process into abuse prohibition and prevention policies
- Review abuse incidents

New Requirements

483.21(b)(3)(iii)

- Culturally-competent and trauma-informed services in accordance with plan of care

483.25(m)

- Trauma-informed care for residents who are trauma survivors
- Purpose: eliminate or mitigate triggers that may cause re-traumatization

New Requirements

483.40(a)(1)

- Must have sufficient staff with appropriate competencies and skills , including appropriate training and supervision for
 - Caring for mental and psychosocial disorders
 - Caring for trauma and post-traumatic stress disorder
 - Identified in the FA

New Requirements

483.70(d)(3)

- governing body is responsible and accountable for the QAPI program

483.75(g)(1)(iv)

- QAA committee must include the infection preventionist



New Requirements

483.80(b)-(c)

- Must designate an infection “preventionist”
 - Nursing, medical technology, microbiology, epidemiology or related training,
 - Be qualified,
 - Work at least part-time,
 - Completed specialized training.
- QAA participation and reporting by the IP



New Requirements

483.85

- Compliance and ethics program

New Requirements

- 483.90(g/f)(1)
 - Call system at bedside
- 483.95
 - Training requirements

CMS Guidance

- **State Operations Manual (updated)**
 - Includes reference to Phase 3 requirements
 - Further updates?
- **Survey & Cert letters**

CMS Guidance

➤ QSO-19-10-NH

➤ Specialized Infection Prevention and Control Training

➤ Free online training from CMS/CDC

➤ <https://www.train.org/cdctrain/search?type=course&query=nursing>

➤ Approximately 19 hours long

➤ Disclaimer that the program does not guarantee compliance with the requirements



CMS Guidance

- Final Rule – trauma-informed care
 - Trauma survivors, including veterans, survivors of large-scale natural and human-caused disasters, Holocaust survivors and survivors of abuse
 - SAMSHA's “Concept of Trauma and Guidance for a Trauma-Informed Approach,” HHS Publication No. (SMA) 14-4884
 - *“based on the knowledge and understanding of trauma and its far-reaching implications”*
 - *Not just trauma-specific interventions*
 - *4 assumptions and 6 key principles: Realize, recognize, respond, resist*



CMS Guidance

SIX KEY PRINCIPLES OF A TRAUMA-INFORMED APPROACH

- 1. Safety**
- 2. Trustworthiness and Transparency**
- 3. Peer Support**
- 4. Collaboration and Mutuality**
- 5. Empowerment, Voice and Choice**
- 6. Cultural, Historical, and Gender Issues**

SMA 14-4884 (2014).

Questions?