



Based on previous survey results, these are the deficiencies most likely to be cited under the new Medicare Conditions of Participation.

→ §484.60 Condition of Participation: Care planning, coordination of services, and quality of care

ACHC Standard: HH5-3A

There is a written plan of care for each patient accepted to services. 484.60, 484.60(a), 484.60(a)(1), 484.60(a)(2), 484.60(a)(2)(i-xvi), 484.60(a)(3)

TIPS FOR COMPLIANCE:

- Ensure all patients have a written plan of care that addresses the issues identified in the comprehensive assessment
- Ensure all physician orders are obtained prior to the initiation of services
- Ensure all orders for all disciplines include the amount, frequency, and duration of the service provided
- Ensure all therapy orders include the specific procedures and modalities to be provided
- Ensure PRN orders for medications and treatments identify an indicator for the administration of PRN treatment or medication
- Ensure all verbal orders are recorded in the plan of care

ACHC Standard: HH5-3B

Care follows a written plan of care established and periodically reviewed by a doctor of medicine, osteopathy, or podiatric medicine. 484.60(a)(1), 484.60(b), 484.60(b)(1), 484.60(b)(2)

TIPS FOR COMPLIANCE:

- Ensure all medications, treatments, and services are administered as ordered by the physician
- Ensure all missed visits are communicated to the physician to determine if the plan of care needs to be altered

ACHC Standard: HH5-3C

The HHA must provide the patient and caregiver with a copy of written instruction in regard to care to be provided. 484.60(e), 484.60(e)(1), 484.60(e)(2), 484.60(e)(3), 484.60(e)(4), 484.60(e)(5)

TIPS FOR COMPLIANCE:

- Ensure all patients are provided the following written information:
 - ▶ Visit schedule, including frequency of visits by HHA personnel and personnel acting on behalf of the HHA
 - ▶ Medication schedule/instructions, including: medication name, dosage, and frequency, and which medications will be administered by HHA personnel and personnel acting on behalf of the HHA
 - ▶ Any treatments to be administered by HHA personnel and personnel acting on behalf of the HHA, including therapy services
 - ▶ Any other pertinent instructions related to the patient's care and treatments that the HHA will provide, specific to the patient's care needs
 - ▶ Name and contact information of the HHA clinical manager



→ §484.60 Condition of Participation: Care planning, coordination of services, and quality of care

ACHC Standard: HH5-8B

The HHA personnel promptly alert the physician(s) to any changes in the patient's condition or needs that suggest outcomes are not being achieved and/or that the plan of care should be altered. 484.60(c)(1), 484.60(c)(2), 484.60(c)(3), 484.60(c)(3)(i-ii)



TIPS FOR COMPLIANCE:

- Ensure all clinicians document communication to the patient, the representative (if any), and the caregiver; and that all physicians issuing orders for the HHA plan of care are notified of any changes that suggest a need to alter the plan of care.

→ §484.75 Condition of Participation: Skilled professional services

ACHC Standard: HH5-11A

The HHA furnishes skilled professional services. Skilled professional services include skilled nursing services, physical therapy, speech-language pathology services, and occupational therapy, as specified in 42 CFR 409.44, and physician and medical social work services as specified in 42 CFR 409.45, 484.75, 484.75(a), 484.75(b), 484.75(b)(1-9), 484.75(c), 484.75(c)(1-3)



TIPS FOR COMPLIANCE:

- Ensure all skilled professional services:
 - ▶ Provide an ongoing interdisciplinary assessment of the patient
 - ▶ Develop an evaluation of the plan of care in partnership with the patient, representative (if any), and the caregiver
 - ▶ Provide services in accordance with the plan of care
 - ▶ Provide patient, caregiver, and family counseling
 - ▶ Provide patient and caregiver education
 - ▶ Complete clinical documentation in accordance with agency policies and procedures
 - ▶ Communicate with all physicians involved in the plan of care



→ §484.80 Condition of participation: Home Health Aide services

ACHC Standard: HH4-14A

Aides providing skilled or personal care services are supervised in those tasks in the patient's home as appropriate to the service level provided. 484.80(h), 484.80(h)(1)

TIPS FOR COMPLIANCE:

- Ensure all patients receiving Home Health Aide services are properly supervised by the Registered Nurse (RN) or other appropriate skilled professional.
- Ensure Home Health Aide supervision validates that care is furnished in a safe and effective manner and addresses the following elements:
 - ▶ The Home Health Aide is following the patient's plan of care for completion of tasks assigned by the RN or other appropriate skilled professional
 - ▶ The Home Health Aide maintains an open communication process with the patient, representative (if any), caregivers, and family
 - ▶ The Home Health Aide demonstrates competency with assigned tasks
 - ▶ The Home Health Aide complies with infection prevention and control policies and procedures
 - ▶ The Home Health Aide reports changes in the patient's condition
 - ▶ The Home Health Aide honors the patient's rights

ACHC Standard: HH5-11F

The HHA defines the duties of the Home Health Aide and ensures they are implemented in patient care. 484.80(g), 484.80(g)(1), 484.80(g)(2), 484.80(g)(2)(i-iv), 484.80(g)(3)(i-iv), 484.80(g)(4)

TIPS FOR COMPLIANCE:

- Ensure the written instructions provided to the Home Health Aide are specific to the task provided and frequency in which to provide it. "Per patient request" and PRN orders should not be used for any tasks, as the Home Health Aide lacks the decision-making ability to interpret information/data needed to revise the plan of care
- Ensure all revisions to the aide plan of care are discussed, approved, and documented by the RN or other qualified professional
- Ensure documentation in the patient record supports that the Home Health Aide provided care in accordance with the plan of care and that if the patient refuses care, the refusal is properly documented



→ §484.55 Condition of Participation: Comprehensive assessment of patients

ACHC Standard: HH5-2F

The comprehensive assessment includes a review of all medications the patient is currently using, both prescription and non-prescription. The drug regimen review occurs as an ongoing part of the care to the patient. 484.55(c)(5)



TIPS FOR COMPLIANCE:

- Ensure an ongoing medication review is completed for all patients; in therapy-only cases, the therapist submits a list of medications for the HHA RN to review
- Ensure all PRN medications identify an indicator as to when the PRN medication should be administered
- Ensure O2 is listed on the medication profile
- Ensure the physician is notified of any medication discrepancies, side effects, problems, or reactions