
PROMISING PRACTICES IN STATE SURVEY AGENCIES

Issue Brief: Training to Strengthen Surveyor Skills and Knowledge Related to Legal Aspects of the Survey Process

Introduction

Substantial federal and state resources are dedicated to training surveyors so that they may effectively conduct survey tasks and responsibilities. Surveyors' core competencies must go beyond clinical aspects of long-term care into regulatory and legal issues that underpin the survey. Adequate training in all job responsibilities is not only critical to job effectiveness but also significantly contributes to job satisfaction (1-3), a key factor in staff retention.

Because the majority of surveyors typically are hired with clinical, public health, or social work backgrounds (4), surveyor training programs must prepare surveyors to effectively and confidently perform in the potentially adversarial regulatory environment; teach them the regulatory language; and strengthen the skills they need to identify, document, and defend findings that may face legal scrutiny, from the informal dispute resolution (IDR) process to hearings. Surveyors who are well trained in the legal aspects of the survey process will enhance investigation and documentation, which will not only contribute to the surveyor's job satisfaction but also increase the likelihood of realizing appropriate enforcement.

Summary of State Examples

This report describes training approaches and programs utilized in the state survey agencies in Florida, Texas, and Wisconsin to strengthen surveyor skills and knowledge on the legal aspects of the survey process. The information presented is based on interviews with agency management and training staff and review of selected training materials.

The key features of the three agencies' legal training components, their impact, and lessons learned from the agencies' experiences are described in this section. Detailed information

on each training practice is presented in state-specific descriptions.

Key Features

In all three agencies, training to strengthen surveyor knowledge and skills related to legal aspects of the survey process is integrated throughout many of the courses in the surveyor orientation programs and is the specific focus of a subset of required orientation courses. In Texas and Wisconsin, education on legal aspects also is delivered through training sessions held throughout the year for new and experienced surveyors. In Florida, teaching materials from orientation courses are available for surveyor reference on an ongoing basis. The training components at all three agencies include courses intended to strengthen surveyors' investigational, decision-making, and documentation skills. The focus of additional legal-related courses at the three agencies varies and includes courses that prepare surveyors to manage situations of abuse and neglect, identify immediate jeopardy conditions, and maintain the confidentiality of public records. Other courses provide information on the federal regulations and legal process. Surveyors in Florida receive additional training to help prepare for effective participation in depositions and hearings.

In each of the three states, the majority of the training on legal aspects of the survey process is developed and implemented by expert staff dedicated to surveyor education and training. Training staff collaborate with agency attorneys to produce courses that incorporate case studies and interactive exercises often based on actual survey, IDR, deposition, and hearing experiences.

Impact

Management and training staff at the featured agencies believe that their training components

focused on skills and knowledge related to legal aspects of the survey process have contributed to enhanced surveyor confidence, investigational skills, and ability to provide supportable documentation.

Evaluation input from surveyors supports the effectiveness of the courses and perceived relevance to surveyor job performance and preparedness. The three agencies have consistently met Standard 2 (Documentation of Survey Results) of the CMS State Performance Measures for the past several years.

Each of the three agencies invests considerable resources to support dedicated staff who lead curriculum development and training for surveyors on all topic areas. Skills and knowledge related to legal aspects of the survey process constitute just one area of focus under the surveyor training programs. The financial costs of developing and implementing training specific to legal topics are largely subsumed under the resources that support the established training infrastructure in place at each agency.

Lessons Learned

Agency management and training staff emphasize the value of utilizing interactive exercises and case studies, particularly those based on real survey issues and experiences in IDR or other legal proceedings. This approach

allows surveyors to more readily adapt classroom learning to practice.

Dedicated staff for curriculum development and training has been a valuable resource for the featured agencies. Agencies without dedicated curriculum design experts, however, could adapt course content and materials from other states to create a similar series of courses without substantial time investment. It is beneficial to collaborate with agency attorneys to instruct surveyors on such topics as investigational skills and preparing for depositions and hearings.

Conclusion

Based on the experiences of the three featured agencies, it appears that the implementation of surveyor training on skills and knowledge related to legal aspects of the survey process contributes to surveyors' ability to effectively investigate facility performance and substantiate and defend findings. These skills are integral to effective surveyor performance. The rigorous training programs at the three agencies are driven by the support of dedicated curriculum design and/or training staff, a model that has been implemented differently in each agency. The teaching materials utilized by the three agencies can facilitate other agencies' efforts to offer courses similar to those provided under the described training programs.

References

- 1 – Walshe K & C Harrington, 2002. Regulation of nursing facilities in the United States: An analysis of resources and performance of state survey agencies. *The Gerontologist*, 42(4):475-486.
- 2 – National Academy of Public Administration (Human Resources Management Panel), 2001. *A Work Experience Second to None: Impelling the Best to Serve*. September 2001.
- 3 – Shields MA & ME Ward, 2001. Improving nurse retention in the National Health Service in England: The impact of job satisfaction on intentions to quit. *Journal of Health Economics*, 20(5):637-70.
- 4 – Watson-Wyatt, 2005. Health care organizations struggle to attract and retain workers. March 30. www.watsonwyatt.com/news/press.asp?ID=14482. Retrieved February 2006.

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Florida

Summary

The relatively frequent involvement of Florida surveyors in legal proceedings and the state's stringent burden of proof requirements compel the Health Standards and Quality Unit of the Florida Agency for Health Care Administration to provide rigorous training for surveyors in how to investigate and substantiate cited deficiencies and defend survey findings against legal challenges. A training video designed to prepare surveyors for effective participation in depositions and hearings is a notable feature of Florida's training program.

Introduction

This report describes the approaches used by the Florida state survey agency to strengthen surveyor skills and knowledge related to the legal aspects of the survey process. The impact of the training approaches and lessons learned that might benefit other agencies also are discussed. The information presented is based on interviews with agency management staff and review of selected training materials.

Background

The Florida agency initiated its 17-week comprehensive surveyor orientation program in the 1990s. The extensive classroom-based training program includes several sessions that focus on strengthening surveyor skills and knowledge related to legal aspects of the survey process; related information also is interwoven throughout other courses in the training program. The structured training program, which replaced a less formal mentor-centered training model, was created in response to changes occurring on the federal level that resulted in more stringent requirements for surveyor training and qualifications (e.g., the OBRA mandate for surveyors to pass the Surveyor Minimum Qualifications Test [SMQT]). The high standard of proof required in the state and the potential for many surveyors to be involved in legal proceedings requiring verbal and/or written

support of survey findings prompted the development of the legal curriculum within the agency's surveyor training program.

Development of a video on preparing surveyors for depositions and hearings was initiated in 2002, when agency management staff determined the need to reduce surveyor anxiety about and better prepare surveyors for effective participation in legal proceedings. With up to 100 hearings related to long-term care surveys scheduled each year, it is critical for Florida surveyors to be knowledgeable about the conduct of such proceedings and to be prepared to provide effective testimony. Although many cases are settled without requiring hearings, depositions often are taken prior to settling. The perception of a surveyor's knowledge and the supporting evidence at the deposition can be influential in determining whether a case is settled or moves forward to hearing.

Intervention

Florida surveyors receive training on skills and knowledge related to the legal aspects of the survey process through both the agency's training program and communications with supervisors and managers in day-to-day operations (e.g., discussions linking ongoing survey activity with potential legal implications). The orientation program for new surveyors encompasses tracks entitled Survey 101, Survey 201, and SMQT

Academy. Training on legal aspects of the survey process is interspersed throughout many of the courses in the orientation program and is the focus of a subset of courses. The five courses that focus on skills and knowledge related to legal aspects of the survey process include the following: (1) Basic Principles of Investigation (with emphasis on mapped decision-making); (2) Information Analysis, Deficiency Determination, and Deficiency Categorization; (3) Legal Principles; (4) Legal Aspects of Surveying; and (5) Quality Assurance Review Performance Standard 2: Survey Findings are Supportable. Several of the courses build on and reinforce information addressed in the Centers for Medicare & Medicaid Services (CMS) Web-based training modules and materials in the *State Operations Manual* (SOM), with the addition of agency-developed interactive exercises (e.g., role playing, writing mock deficiency statements) to promote active learning. PowerPoint presentations, written exercises, and other resources utilized in the training sessions are available to all staff for review at any time if surveyors (or their supervisors) wish to reinforce particular knowledge or skill areas.

Florida's videotape preparing surveyors for participating in depositions and hearings is a unique component of the agency's training program. The video, which was produced in November 2003, is viewed and discussed by new surveyors during the Survey 201 session on Legal Aspects of Surveying, and also is routinely utilized by surveyors when preparing for a deposition or hearing, prior to meeting with the agency's Office of Legal Counsel attorneys. The video presents simulated depositions and hearings that are based on true events. The video was scripted, acted, and produced as a collaborative effort by agency surveyors, attorneys, and multimedia staff. The video's scriptwriter endeavored to highlight the importance of ensuring that testimony shows the surveyor's detailed understanding of and adherence to the requirements and guidance delineated in the SOM. The critical role that precise and thorough documentation can play in defending survey findings also is emphasized.

Implementation

Training staff in the agency's Survey Integrity and Support Branch (SISB), an interdisciplinary group of seven expert surveyors responsible for overseeing surveyor education, developed the described courses with input from agency attorneys. The courses are taught by SISB staff, agency attorneys, and faculty from the Health Standards and Quality Unit.

Agency surveyors, attorneys, and multimedia staff collaborated to develop the video on preparing for depositions and hearings. Agency staff estimate an investment of approximately \$7,000 to create the video, including equipment, staff time spent writing, scripting, acting, and producing it, and time spent by the multimedia division. The agency's multimedia staff project that development of the video by an outside contractor would have cost the agency approximately \$70,000.

Impact

Agency management perceive that the training programs have resulted in enhanced surveyor confidence, supportable documentation and effective evidence collection, and reduced turnover of citations in IDR and court proceedings.

Positive evaluation feedback from surveyors participating in Survey 101, 201, and SMQT Academy courses indicates that surveyors perceive the courses to prepare them to effectively perform job responsibilities.

Surveyors are reported to consistently express that viewing the videotape on depositions and hearings increased their confidence and sense of preparedness prior to participation in legal proceedings. Agency management staff believe that greater surveyor confidence has led to more effective handling of questions during depositions and hearings. The videotape appears to be a critical resource for Florida surveyors, particularly in view of the frequency of surveyor involvement in legal proceedings. Surveyors in any state where the potential for participating in depositions or hearings exists would likely benefit from the video, which is available at no

cost for all survey agencies to use (see Contact Information and Resources section below).

The video was recognized by the Association of Health Facility Survey Agencies (AHFSA) in the Promising Practices competition in 2004. In addition, the agency received a Productivity Award from the state of Florida commending their effective use of state resources by developing and producing the video within the agency, thereby avoiding the substantially higher costs of utilizing an outside contractor.

Lessons Learned

For agencies interested in utilizing the video on depositions and hearings as a training resource, it is recommended that an attorney introduce the video and lead follow-up discussion that includes sharing experiences from actual depositions and hearings. Attorney involvement in presenting and discussing the video may further build surveyor understanding of what to expect from legal proceedings and perhaps result in greater confidence and a stronger sense of preparedness. Agency staff involved in developing the video would like to supplement the video with participation in interactive exercises that would give surveyors the opportunity to experience

questioning by agency attorneys, similar to that a surveyor likely would experience during a deposition or hearing. Surveyors would learn from critique, analysis, and guidance on how best to respond to the questions. The video currently is provided on VHS, although agency staff believe it would be useful to create DVDs or CDs to facilitate viewing on laptops and provide greater durability.

Contact Information and Resources

To request a copy of the video on depositions and hearings, or for more information about the training approaches used to strengthen surveyor skills and knowledge related to the legal aspects of the survey process at the Florida Agency for Health Care Administration, please contact Dr. Susan Acker at 850/922-9138 or ackers@ahca.myflorida.com. Teaching materials used to support several of the courses described in this report are available on this Website and can be accessed online by clicking on the Promising Practices State Supplemental Resources link. For further information on teaching materials, please contact Carlton Bradley, Systems Project Analyst at 850/410-1061 or bradleyc@ahca.myflorida.com.

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Training to Strengthen Surveyor Skills and Knowledge Related to Legal Aspects of the Survey Process Texas

Summary

The Regulatory Services section of the Texas Department of Aging and Disability Services (DADS) provides multiple training courses designed to increase surveyor skills and knowledge on the legal aspects of the survey process. Their goal is to improve surveyor performance and consistency with regard to investigational skills, decision-making, and accurate and supportable documentation across all regions of the state.

Introduction

This report describes the set of courses provided by the Texas state survey agency that focus on strengthening surveyor skills and knowledge related to legal aspects of the survey process. The impact of these training offerings and lessons learned that might benefit other agencies considering implementing similar training also are discussed. The information presented is based on interviews with agency management and training staff and review of course summary materials.

Background

The agency implemented several courses designed to build or refine surveyor skills and knowledge related to legal aspects of the survey process in 1999. The courses were developed to address the need identified by agency management staff to strengthen the consistency of training and performance in investigation, decision-making, and producing supportable documentation across surveyors in all regions of the expansive state.

Intervention

In addition to instruction interspersed throughout the agency's new surveyor orientation curriculum, the agency provides several courses focused exclusively on knowledge and skills related to the legal aspects of the survey process. New surveyors are required to complete the courses within the first 18 months of employment at the agency. In addition, selected courses are designed for and require attendance by experienced surveyors.

The eight currently offered courses that focus on legal aspects of the survey process include (1) Abuse and Neglect (based on the CMS course); (2) Advanced Principles of Documentation (for experienced surveyors); (3) Appendix Q and You (which delineates the process of determining immediate jeopardy situations for all program areas); (4) Basic Investigation Techniques; (5) Nursing Facility (NF) Enforcement Overview for Surveyors; (5) Litigation, (6) Writing and Critiquing Deficiencies; and (7) Writing Effective Referrals. The courses range from one day to two and a half days in duration, with most classes involving a combination of lecture, discussion, and skills practice through exercises and case studies.

Curriculum development experts in the Regulatory Services' Policy Development and Support Division created the courses, many of which are designed for surveyors of all provider types. When relevant, the courses are tailored to specific provider types. For example, Writing and Critiquing Deficiencies is designed and conducted separately for surveyors in the intermediate care facility for mental retardation (ICF/MR), home health, and geriatric programs, and NF Enforcement Overview for Surveyors is required only for geriatric program surveyors.

The course on Litigation is taught by agency attorneys specializing in regulatory enforcement. The other six courses are conducted by a group of trainers in the DADS Educational Services Department who are dedicated to Regulatory Services. The courses are presented multiple times per year at each regional office to ensure

that all surveyors are able to complete them within 18 months of beginning employment at the agency.

Implementation

The Litigation class, which provides surveyors and program managers an overview of the legal process and practice in being an effective witness (e.g., preparing for hearings, providing testimony), was the first course developed in the area of legal aspects of the survey process. The course evolved from a presentation initially developed by agency attorneys for their regional office staff and subsequently presented at a statewide conference for all nursing facility surveyors. After the conference, agency management recommended establishing a required course on litigation to help promote consistency in the areas addressed in the presentation among surveyors throughout the state. Curriculum development and training staff collaborated with the involved attorneys to adapt their presentation material to the training course format. The six additional courses addressing skills and knowledge related to legal aspects of the survey process were developed by the curriculum development staff soon after the Litigation course was established.

Eight full-time staff in the Policy and Development Support Division are responsible for designing all training curriculum for surveyors and supporting IT and administrative staff. Eleven trainers and one manager in the Educational Services section of DADS are dedicated to conducting training sessions for new and experienced surveyors. Each of the agency's eleven regional offices has a local trainer who coordinates scheduling of courses and conducts the courses for the surveyors in the region.

Impact

To ensure the relevance and effectiveness of the courses, participating surveyors are asked to complete evaluation forms. The evaluations request feedback regarding the clarity and

relevance of the course content and materials, effectiveness of the instructor, and suggestions for improving the course. Agency management staff indicate that evaluation feedback from the past year has been extremely positive, with 95% of surveyors assessing all evaluated categories as "successful" or "excellent." In addition to surveyor feedback on specific courses, the utility of the courses as a whole is monitored by a committee composed of regional representatives, department managers, and policy personnel. The committee meets quarterly to review the offered courses, the curriculum, and aspects of the training program to ensure that ongoing and new training needs are being met.

Lessons Learned

Training staff emphasize the value of developing a high quality training program to establish and maintain effective performance by new and experienced surveyors. The agency was able to develop and provide the set of courses in the legal training track without budgetary impact beyond the resources utilized to maintain the established curriculum design and training staff. Agency staff believe that agencies without dedicated curriculum design experts could adapt the course content and materials used in Texas to create a similar series of courses without substantial time investment.

Contact Information and Resources

For more information about the training approaches to increase surveyor skills and knowledge on the legal aspects of the survey process at the Texas Department of Aging and Disability Services, please contact Chris Adams, Director of Survey Operations, at 512/438-5695 or chris.adams@dads.state.tx.us. Course descriptions and the course evaluation form used in Texas are available on this Website and can be accessed online by clicking on the Promising Practices State Supplemental Resources link.

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Wisconsin

Summary

The Bureau of Quality Assurance (BQA), Division of Disability and Elder Services, at the Wisconsin Department of Health and Family Services provides training to strengthen surveyor skills and knowledge related to the legal aspects of the survey process through several educational offerings. Training in this area is the focus of four sessions in the six-week orientation program for new surveyors, a three-day General Investigative Skills course, and intermittent topic-specific training sessions.

Introduction

This report describes the components of Wisconsin's training program that focus on strengthening surveyor skills and knowledge related to the legal aspects of the survey process. The impact of these training offerings and lessons learned that might benefit other agencies considering implementing similar training also are discussed. The information presented is based on interviews with agency management and training staff and review of selected training materials.

Background

Agency management and training staff initiated the training component on enhancing skills and knowledge related to legal aspects of the survey process with the purpose of promoting interactive, hands-on learning opportunities in these areas for new surveyors. The curriculum relies heavily on interactive discussion, case studies, and other exercises to facilitate integration of classroom learning into job performance.

Intervention

The Wisconsin agency requires new surveyors to complete a six-week orientation program that alternates periods of interactive classroom learning with fieldwork under the mentorship of experienced surveyors. Training on skills and knowledge related to legal aspects of the survey process is interspersed throughout the orientation

program and also is the exclusive focus of four orientation courses. The four courses include (1) Investigative Skills Targeted to Survey Processes; (2) Public Records and Confidentiality; (3) Principles of Documentation (POD); and (4) Resident Rights, Protection Advocacy, and Abuse and Neglect. The courses range in duration from two hours to a full day (for the course on POD). Teaching methods utilized in the orientation courses include classroom-based case study and role-playing exercises, an agency-developed Web-based training course, mentor-guided observation, and reading and written assignments. Case studies and other exercises are based on actual experience with survey implementation, informal dispute resolution (IDR) reviews, and feedback from the Federal Oversight and Support Survey (FOSS) analysis. The POD course utilizes Centers for Medicare & Medicaid Services (CMS) guidance on writing a deficiency statement and gives surveyors experience with developing mock deficiency statements.

The agency's Training/Quality Improvement (QI) Unit staff developed the courses, with collaboration from the agency's Office of Legal Counsel (OLC) attorneys for the course on Public Records and Confidentiality and the course on Investigative Skills Targeted to Survey Processes. These two courses are taught by an OLC attorney, while the courses on POD and Resident Rights, Protection Advocacy, and Abuse and Neglect are conducted by Training/QI Unit and other agency staff. The orientation

program typically is offered twice a year, depending on the number of newly hired surveyors.

In addition to completing the orientation program, new surveyors also are required to attend a three-day course on General Investigational Skills taught by attorneys from the OLC in collaboration with the Training/QI Unit. The course, which is open to all staff at the Department of Health and Family Services, emphasizes interactive and hands-on exercises to promote investigational and observational skills. The course includes instruction on the following topics: regulatory authority and principles, evidence, planning an investigation, observation and memory, interviewing and identifying deception, record review, decision making, report writing, and the hearing and appeals process. The General Investigational Skills course is offered twice a year.

Experienced surveyors are encouraged to attend orientation courses or the General Investigational Skills course on a case-by-case basis when they or their supervisors believe it would be valuable to review and reinforce knowledge or skill areas addressed in these offerings.

Legal topics also may be the focus of staff training sessions such as an August 2005 session entitled "Closing the Loop and Making It Stick." This session discussed reasons that deficiencies were amended or deleted during IDR experiences, described the essential components of a thorough investigation, and identified key resources to utilize when conducting a comprehensive investigation.

Additional mechanisms for educating surveyors include sharing information obtained from IDR review and FOSS conclusions via discussion with supervisors or, when appropriate, topical training sessions at regional surveyor staff meetings throughout the state. Agency management staff also utilize memos researched and developed by OLC staff to disseminate updated information on particular regulatory tags or other areas of interest. The memos are disseminated to surveyors through regional managers, who may conduct meetings to discuss how to translate the information into practice when surveying a

facility. The BQA memos on legal issues and OLC feedback also are incorporated into new surveyor orientation courses along with important IDR and FOSS findings.

Implementation

The agency's Training/QI Unit staff led the development of the orientation program for new surveyors. They collaborated with Office of Legal Counsel staff to develop the sessions on Public Records and Confidentiality and Investigative Skills Targeted to Survey Processes. The orientation program was established in 1992 and is continuously refined and updated to reflect changes relevant to agency operations, surveyor responsibilities, or the survey process. The General Investigational Skills course was first presented in 1998 (initially as a five-day session).

Agency management staff estimate that staff time equal to approximately three full time equivalents (FTEs) annually is dedicated to all training development, implementation, and coordination for both long-term care and non long-term care surveyors. Training on legal issues is only one aspect of the instructional offerings.

Impact

Agency management believe that training focused on skills and knowledge related to the legal aspects of the survey process has contributed to more precise, supportable documentation by surveyors. The evidence they offer is low rates of citations overturned or substantively altered during the IDR process.

Surveyors also are perceived by supervisors and by their own assessment to be better equipped to observe and investigate important care areas as a result of the investigative skills training and ongoing topic-specific training. One example of the impact of greater observational and investigational skills resulting from a topic-specific training effort, as described by agency management, relates to training provided to all surveyors to increase awareness and investigation of handwashing by facility staff. The training is believed to have led to more frequent citation of F tag 444 due to observed problems with handwashing practices; surveyors' increased

focus in this area led to efforts by the industry to improve handwashing practices, with the likely outcome of more careful handwashing by facility staff and enhanced infection control.

Lessons Learned

Wisconsin management and training staff report positive experiences with continued implementation of learning opportunities for survey staff in the area of legal aspects of surveying. Training staff and surveyors have found it valuable to base case scenarios, in-class exercises, and other interactive activities utilized during training sessions on real survey experiences, questions and issues. This approach prepares surveyors to readily integrate what they learn into their performance of survey responsibilities.

Contact Information and Resources

For more information about the training approaches used to strengthen surveyor skills and knowledge related to the legal aspects of the survey process at the Wisconsin Department of Health and Family Services, please contact Sharon Rickords, Training/QI Unit Supervisor, at 608/267-3745 or rickosl@dhfs.state.wi.us. Teaching materials used to support the courses described in this report are available on this Website and can be accessed by clicking on the Promising Practices State Supplemental Resources link. For further information on teaching materials, please contact Phyllis Varsos, Staffing Training Coordinator, at 608/266-9432 or varsopm@dhfs.state.wi.us.

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