

Center for Medicaid and State Operations/Survey and Certification Group

Ref: S&C-05-21

DATE: March 10, 2005

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: **Nursing Homes** - Notification of Imminent Issuance of Appendix PP Revisions, State Operations Manual (SOM), Surveyor Guidance for Incontinence and Catheters

Letter Summary

- Issuance of F315 and F316, Incontinence and Catheters is expected within the next several weeks;
- The new guidance consolidates former Tags F315 and F316 into one Tag, F315.

Background

The Centers for Medicare & Medicaid Services (CMS) has had a project underway to convene expert panels to assist in developing revisions to interpretive guidelines at several key Tags in Appendix PP of the SOM. This ongoing project has now produced the second of our planned Tag revisions, for Incontinence and Catheters, which are currently Tags F315 and F316. In addition, Tags F315 and F316 are being revised into one Tag, which will be F315. The document has gone through public comment and subsequent revision and is now in final clearance for issuance in the very near future. The new guidance contains, in addition to interpretive guidelines, an investigative protocol and specific severity guidance for determination of the correct level of severity of outcome to residents from deficiencies at Tag F315.

Discussion

CMS plans more Tag revisions in fiscal years 2005 and 2006, under the current project. Each Tag is proceeding through expert panel development, public comment, panel review of comments, revisions based on those comments, and then internal clearance. For this reason, each Tag is on its own time schedule for issuance. The next Tag revisions, which are expected to be issued within the next few months, are:

- F501, Medical Director;
- F248 & F249, Activities and Activity Director;
- New guidance at Appendix P, Part V, Deficiency Categorization concerning determination of severity for deficiencies having a psychosocial outcome to resident (Psychosocial Outcome Guide).

The issuance of other Tags is planned for later dates. We plan to provide prior notification to you as each product nears final issuance.

For questions on this memorandum, please contact Karen Schoeneman at (410) 786-6855 or e-mail at kschoeneman@cms.hhs.gov.

Effective Date: The revised guidance and consolidation of Tag numbers becomes effective upon issuances as a transmittal on the CMS manuals Web site at http://www.cms.hhs.gov/manuals/transmittals/comm_date_dsc.asp. CMS sends the transmittal to states and CMS Regional Offices when it is placed on the Web site and incorporates the new information into the Web-based SOM shortly thereafter. Please make sure appropriate staff is informed of these changes within 7 business days of transmittal and implemented no later than 60 days after transmittal.

Training: The information contained in this announcement should be shared with all long term care survey staff, their managers and the state/RO training coordinators.

/s/

Thomas E. Hamilton

cc: Survey and Certification Regional Office Management (G-5)