



DQA - PROVIDER RELATIONSHIPS DURING THE NURSING HOME SURVEY PROCESS

Shared Expectations

It is the common expectation of both the provider and DQA that all parties will be treated with respect, dignity, and professionalism during the survey process and subsequent interactions.

1. The nursing home administrator (NHA) is responsible for the overall management of the facility. The NHA may delegate certain survey-related responsibilities to the Director of Nursing (DON). Upon commencement of the survey, the facility will inform the DQA team leader which staff person is the primary point person for the facility during the survey process.
2. The survey team leader is responsible for the activities and schedule of the survey. The DQA team leader does not have direct supervisory responsibility over the survey team; provider concerns should be brought to the individual surveyor and/or the team leader. All parties agree that issues or concerns that arise during the survey are best addressed on-site. However, in the event that a situation is escalating, the Regional Supervisor for the surveyors is the correct party to become involved.

Provider concerns that arise during the survey **that can not be addressed on-site** should be referred to the DQA Regional Field Office Director/Supervisor. DQA concerns should be brought to the attention of the NHA or DON.

Joint Recommendations or Statements of Expectations

The following recommendations or statements of expectations are offered jointly by DQA and the provider community.

- At the commencement of the survey, the facility representative and DQA team leader will meet to discuss their common understanding of how surveyor-facility communications will occur during the survey process and what information should be gathered to enable the surveyors to complete their assigned tasks.
- In the event the demeanor or conduct of facility staff during the course of the survey is viewed by a survey team member as being inconsistent with the common expectation depicted above, the survey team leader shall be notified. The team leader shall, in turn, alert the nursing home administrator (NHA) to the nature of the concern. Similarly, if concern is expressed by facility staff that surveyor demeanor or conduct is not meeting shared expectations, the NHA shall be notified. The NHA shall, in turn, communicate that concern to the survey team leader. In either event, the team leader and administrator shall attempt to address and informally resolve all concerns expressed by or about their respective staff.
- When being interviewed by DQA surveyors, a facility staff member may request to be accompanied by another member of the facility staff. Such requests will be accommodated by DQA unless confidentiality or privacy concerns dictate otherwise.
- Whenever possible, on-site resolution of issues, concerns, or problems is encouraged. DQA surveyors will share information about potential survey deficiencies as soon as possible and as permitted under the federally-prescribed survey process. DQA encourages facilities to provide surveyors with additional information and documentation, as appropriate, to clarify any potential deficiencies.
- Facilities are encouraged to provide, as necessary and appropriate, additional information or documentation to DQA prior to issuance of the CMS 2567, Statement of Deficiencies (i.e., these materials may be submitted after the survey team exits the facility). If these materials are submitted in a timely manner, DQA agrees to acknowledge that they were reviewed and considered prior to issuance of the final CMS-2567. This is not meant to circumvent or replace the Informal Dispute Resolution process.
- Facilities' nursing policies and procedures should reflect a recognized standard of practice. The Wisconsin Clinical Resource Center, which provides free access to the American Medical Directors Association's (AMDA) Clinical Practice Guidelines, is an excellent source of such recognized standards of practice. (See: https://wcrs.chsra.wisc.edu/wcrs/index_wcrs.asp) DQA acknowledges that many standards of practice exist for specific clinical areas (e.g., pain management). No cite will be issued by DQA simply because one standard may be "favored" over another.
- DQA may, as appropriate, share information on facility best practices and innovations. In doing so, the provider community acknowledges that the sharing of this information is intended to improve the care and services to Wisconsin's nursing home residents; it does not constitute an endorsement of such practices or innovations or imply blanket immunity to regulatory actions if adopted or followed.
- All providers are encouraged to complete the DQA Post-Survey Questionnaire, regardless of the survey outcomes or performance. See: <http://4.selectsurvey.net/DHS/TakeSurvey.aspx?SurveyID=ml00584>