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DQA Memo 12-020

To: Federally Certified Nursing Homes

NH 14

From: Juan Flores, Director
Bureau of Nursing Home Resident Care

Via: Otis Woods, Administrator
Division of Quality Assurance

Clarification Concerning Posting Requirements for Nurse Staffing

The purpose of this memo is to clarify the confusion that exists concerning the nurse staffing information that nursing homes are to post daily, as required at F356 [483.30(e)], and to update providers on the types of issues that have been identified in citations at F356 in the last two years.

Required Staffing Information

According to F356, nursing homes must post information about the number of staff directly responsible for resident care on each shift. This information must be posted in a prominent place, readily accessible to residents and visitors at the start of each shift. Facilities are not required to post staffing information on each floor, unless they choose to do so.

The information that is posted must include the following. Note that the number in parentheses indicates the number of times this issue was identified on the 41 citations issued since 11/1/10:

1. Facility name (4)
2. The current date (1)
3. The total number of staff directly responsible for resident care per shift for each of the following categories: licensed (RNs, LPNs), and unlicensed (CNAs) (14). (For example, 1 RN, 2 LPNs, 4.5 CNAs.) The number of RNs must be separate from the number of LPNs. (5)
4. The actual hours worked per shift for each of the following categories: licensed (RNs, LPNs), and unlicensed (CNAs). For example, if three CNAs on the evening shift work from 2:30 PM to 10:30 PM and 1 CNA works from 5PM to 9 PM, the facility's posting should indicate:

<u>Actual hours worked</u>	<u>Staffing total</u>
3 CNA (2:30 PM – 10:30 PM)	3.5 CNAs
1 CNA (6:00 PM – 10:00 PM)	

This has been the most frequent issue identified at F356; it was noted on 28 of the 41 citations issued at F356 since 11/1/10. One common problem was the failure to report the actual hours of staff who worked partial shifts and, for example, lumping them under the 3:00 to 11:00 PM shift.

Although some nursing homes have chosen to do so, it is NOT required to post the names of the staff who are on duty.

5. Resident census (8)

Facilities may, in addition, append to the staffing notice and identify the number of employees who are working but not directly responsible for resident care.

Timing

Information is to be posted daily and must be present at the start of each shift. Nursing homes can choose to post staffing information for the entire day or for the current shift.

Nursing homes are required to update the posted staffing if any changes arise, for example, if a nursing assistant calls in sick or goes home sick and is not replaced. Failing to update the posted staffing was identified on 8 citations. Another six citations identified the fact that the posting was not current for the present day.

Retention

Posted nurse staffing information shall be maintained for 18 months. This was an issue identified on 7 of the citations issued since 11/1/10. Nursing homes must make staffing information available to the public, upon written or oral request, at a cost not to exceed the community standard for copying.

Format

The Centers for Medicare and Medicaid Services (CMS) did not require nursing homes to use a specified format to allow facilities flexibility in how they report varied staffing patterns for employees who work non-standard or overlapping shifts.

The Federal Register for 10/28/2005 gave the following format as an example that nursing homes could use to post its staffing information. Please note that while this is not a required format, it does contain all the information that is required to be posted.

Facility Name				
December 6, 2012 (current date)				Census: 88
Shift	Category of staff		Actual Hours Worked	Staffing Total
7 a.m. – 3 p.m.	Licensed	RN	2 RN 7 a.m. – 3 p.m. 2 RN 7 a.m. – 11 a.m. 1 RN 11 a.m. – 3 p.m.	3.5 RNs
		LPN	2 LPN 7 a.m. – 3 p.m.	2 LPNs
	Unlicensed	CNA	8 CNA 7 a.m. – 3 p.m. 1 CNA 7 a.m. – 11 a.m.	8.5 CNAs
3 p.m. – 11 p.m.	Licensed	RN	1 RN 3 p.m. – 11 p.m.	1 RN
		LPN	2 LPN 3 p.m. – 11 p.m. 1 LPN 3 p.m. – 7 p.m. 1 LPN 7 p.m. – 11 p.m.	3 LPNs
	Unlicensed	CNA	6 CNA 3 p.m. – 11 p.m. 1 CNA 3 p.m. – 7 p.m. 1 CNA 6:30 p.m. – 8:30 p.m.	6.75 CNAs
11 p.m. – 7 a.m.	Licensed	RN	1 RN 11 p.m. – 7 a.m.	1 RN
		LPN	1 LPN 11 p.m. – 7 a.m.	1 LPN
	Unlicensed	CNA	4 CNA 11 p.m. – 7 a.m.	4 CNAs

Note: If an LPN worked a 12-hour shift, the LPN's time would be reflected as providing 8 hours from 7 a.m. to 3 p.m. on the day shift and four hours on the evening shift (3 p.m. to 7 p.m.).

Questions

Questions regarding this memo should be directed to the Regional Field Operations Director for the region in which your facility is located. Regional contact information is located at:

http://www.dhs.wisconsin.gov/rl_DSL/Contacts/reglmap.htm