

CMS Hospital Improvement Act Proposed Changes  
Nursing, Medical Records, Infection Control, Antibiotic Stewardship Program, Restraints, QAPI,

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### Overview

CMS has proposed some significant changes to the hospital conditions of participation (CoPs) that every hospital should know including critical access hospitals. This include changes to nursing, medical records, infection control, QAPI, patient rights, and restraint and seclusion. It will also require all hospitals to have an antibiotic stewardship program and what the program should include. It will include a prohibition on discrimination which must be given to patients in writing.

### Detailed Outline

#### Patient Rights and Medical Records

- Restraint five changes
- Change from LIP to licensed practitioner (LP)
- Physician Assistants (PAs) to order and evaluate
- Right to access medical records
  - Oral or written request
- OCR 2016 2 documents
- Non-discrimination
  - Written policy prohibiting
  - Inform each patient on prohibition against discrimination
  - Inform on how to file a complaint
- Medical Records
  - Content of medical records
  - Document complications and hospital acquired conditions
  - Diagnosis in outpatient record in 7 days
  - Final diagnosis
  - Discharge instructions and transfer summaries
    - Will also discuss Nov 3, 2015 FR on proposed discharge planning standards related to discharge instructions and transfer summaries
  - Information to monitor patient conditions

#### QAPI

- Quality indicator data including patient care data
- Medicare Quality Reporting Data

- Hospital readmission data
- Hospital acquired conditions (HACs) and 5 changes

#### Nursing Services and Outpatient Departments

- Staffing-adequate number
- Supervisory staff
- Need to respond immediately when needed
- Nursing care plans
- Policies and procedures
- CNO must evaluate nursing staff including agency staff
- All outpatient departments must identify if RN must be present
- Outpatient policy required
- P&P must be reviewed by MEC
- Annual review of P&P
- Orders for drugs and biologicals
- Verbal orders

#### Infection Control and Antibiotic Stewardship

- Hospital wide surveillance
- Following national recognized standards and best practices
- Infection control hospital wide QAPI program
- Infection control program and policies requirements
- Qualified infection preventionist
- Requirements for the antibiotic stewardship program
  - Qualified leader who must be appointed by the board
  - Active program and evidenced based use of antibiotics
  - Document improvements and reduction of CDI
  - Board responsibilities
  - Responsibilities of leader of antibiotic stewardship program
- Antibiotic stewardship policies
- Tracking all infections
- QAPI leadership
- Competency based staff training

#### Who Should Attend?

Pharmacist, chief nursing officer, health information management, infection preventionist, antimicrobial stewardship team members, nurses, nurse educators, chief medical officer, QAPI staff, patient safety officers, regulatory and compliance officers, physician assistants (PAs), patient advocate, risk management, nurse educators, hospital legal counsel, MEC chair, board

members, and anyone involved in implementing the hospitals CoPs. Anyone who is interested in the CMS 5-star rating system should also attend.

### Objectives

- Recall that hospitals will have to implement an antimicrobial stewardship program
- Discuss that CMS proposes to change LIP to LP (licensed practitioner) so PAs can order restraint and seclusion and do assessments
- Describe that the hospital must have policies that describe which outpatient areas require a RN
- Recall that a final diagnosis would have to be in the medical record for all outpatients within 7 days

### Post Test Questions

1. CMS is proposing to require hospitals to include a final diagnosis in all outpatient medical records in how many days?
  - a. 30 days
  - b. 21 days
  - c. 7 days**
  - d. There is no proposed requirement
2. CMS is proposing to change LIP (licensed independent practitioner) to which of the following so PAs could order restraint and seclusion?
  - a. Licensed practitioner (LP)**
  - b. Licensed dependent practitioner (LDP)
  - c. Independent PA practitioner (IPaP)
  - d. None of the above
3. The proposed changes would require hospitals to incorporate which of the following into the QAPI program?
  - a. Quality data received from quality reporting programs such as readmission data
  - b. Data from value based purchasing program (VBP)
  - c. Data from hospital acquired conditions (HACs)
  - d. All of the above**
4. Patient access to medical records includes all but which one?
  - a. In format requested by the patient so could get electronic copy or paper copy
  - b. Can charge a retrieval fee and patient must have paid their hospital bill to get access to medical records**
  - c. Access must be made within a reasonable time which is usually less than 30 days
  - d. Can be made upon oral or written request
5. A hospital must meet the following except which one regarding non-discrimination?

- a. Notify the patient that have the right to be free from discrimination which includes race, color, religion, national origin, sex, gender identity, sexual orientation, age, or disability
  - b. Must have a written policy on this
  - c. Must post a sign outside the hospital regarding discrimination**
  - d. Inform the patient how to file a complaint if they encounter discrimination
6. Nursing services must have all of the following except which one?
- a. Adequate number of nurses to take care of patients
  - b. Supervisory staff for each nursing units
  - c. Must have at least one RN for each five patients**
  - d. Enough staff to respond to a patient when there is an immediate need
7. Which one is NOT true about nursing care plans?
- a. A nurse must have a separate nursing plan of care and cannot include it in the interdisciplinary plan of care**
  - b. Nursing care plans are a frequent deficiency
  - c. Must start a nursing care plan soon after the patient is admitted
  - d. The plan of care must be maintained in the medical record
8. Which of the following must be documented in the medical record?
- a. Complications
  - b. Hospital acquired conditions (HACs)
  - c. Healthcare associated infections (HAIs)
  - d. Adverse reactions to all drugs and anesthesia
  - e. All of the above**
9. **True** or False All hospitals are required to have an antibiotic stewardship program?
10. The hospital must infection control policies on all EXCEPT which one of the following?
- a. The infection preventionist must be qualified by education, training, experience or certification
  - b. The infection preventionist must be certified within 3 years of accepting the position**
  - c. Policy includes methods for preventing and controlling infection
  - d. Policy includes surveillance and how to control HAIs
11. The antimicrobial stewardship policy must include all but which one?
- a. Board must appoint a qualified person to be the leader of the antibiotic stewardship program
  - b. QAPI program
  - c. Evidenced based use of antibiotics
  - d. Must include a both a physician leader and pharmacist to be in charge of the program**