

Statement of Deficiency Writing Guidelines

The purpose of this document is to provide basic writing guidelines that can be applied along with the Principles of Documentation (POD). The writing guidelines below are followed by examples to assist the surveyor in mastering the writing principles associated with POD.

Deficient Practice Statement

Begin your Deficient Practice Statement (DPS) with:

“Based on observation, interview, record review, and policy review...” (Use whatever evidence sources that are appropriate for your citation).

If you later add to the citation, make sure you review the DPS and update it to reflect your additional evidence.

Example: “Based on interview and record review, the facility failed to follow their policies and procedures, and did not perform a Medical Screening Examination (MSE) on one patient (Patient #30), within the hospital’s capability, to determine if an emergency medical condition existed. This occurred for one patient (Patient #30) out of 30 Emergency Department (ED) patient medical records reviewed from January 2012 to June 2012 (the hospital sees an average of 550 ED cases per month).” [Note: For Ambulatory Surgery Centers (ASC), the following format is used: The Ambulatory Surgical Center does an average of XXX cases per month. On the first day of the survey, there were XX scheduled cases.]

Findings included [Note: Not “Findings include:” Also, do not capitalize or bold this statement.]

How to Reference a Facility Policy:

- Place the facility policy at the beginning of the citation.
- Use only the part of the policy that supports your citation.
- Do not include the words "in part" and do not identify the section of the policy from which you are quoting material.
- Only put the policy title in quotes, not the policy directives you are including.
- Note the punctuation used in the template below.
- Key punctuation notes to remember: Put a comma after the word titled, name the policy in quotes, and follow that with another comma.
- Use the following template for referencing a policy:
 - Example of a dated policy and using one piece of information from the policy:
 - Record review of the facility's policy titled, "Infection Control and Hand Washing," dated 04/04/08, showed that staff are to wash their hands after removing gloves and when entering a patient's room.
 - Example of an undated policy and using three or more pieces of information from the policy:
 - Record review of the facility's undated policy titled, "Infection Control and Hand Washing," showed that facility staff are to wash their hands:
 - When entering a patient's room;

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- Between glove changes; and
- After removing gloves for the final time.
- Example of a revised policy and using one piece of information from the policy:
 - Record review of the facility's policy titled "Infection Control and Hand Washing," revised on 04/04/08, showed direction for facility staff to wash their hands after removing gloves.
- Example of either no existing policy, or policy not being provided as requested:
 - Record review of Patients' Rights policies showed the facility had no policy for visitation rights.
 - Record review of Nursing Services policies showed the facility failed to provide policies as requested for hand washing/hand hygiene and contact isolation precautions.

How to Document Observations:

- When recording observations, use the verb "showed." For example:
 - Observation on 11/03/10 at 1:15 PM showed Patient #4...
- Note: Record the date, time, and location of observations.

How to Document Interviews:

- When recording interviews, use the verb "stated" or "stated that." Use the verb "stated" for direct quotes with quotation marks and "stated that" for paraphrasing general intent.
Examples:
 - During an interview on 11/03/10 at 1:20 PM, Staff C, Administrator, stated, "We never had a need for a policy on hand hygiene."
 - During an interview on 11/03/10 at 1:20 PM, Staff C, Administrator, stated that the facility does not have a policy on hand hygiene.
 - Note the punctuation used above. Put a comma after the "staff identifier name" (Staff C) and another after the person's title (Administrator). If using a direct quote, put a comma after stated. If paraphrasing, you do not need to add a comma after the words 'stated that'.
- Record the date and times of interviews (and location if applicable to findings).
- When referencing staff:
 - Spell out their specialty or knowledge base/experience.
 - Use their abbreviated title.
 - Remember, though, as with all abbreviations spell it out and then put the abbreviation. See example below.
 - During an interview on XX/XX/XX at 1:15 PM, Staff C, Registered Nurse (RN) stated that she gave Patient #4 500 milligrams (mg) of Morphine (pain medication).
- Interviews specific to a patient should be included in the same number reference finding as the rest of the information regarding that patient.

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- General interviews that are used to support the entire citation should be placed at the end of the citation and each interview should be given its own reference number.
- Quotes, if used in documenting an interview, must reflect the exact words said by the interviewee.
- Use quotes sparingly.
- Paraphrasing is preferred unless the exact words make the citation stronger or point out the magnitude of the citation or make it clear that a descriptive phrase is that of the interviewee, not the surveyor
 - Example:
 - Staff Z, RN stated that he struck Patient #1 versus Staff Z, RN stated, "I punched the old fool in the face."
- If you need to clarify something within a quote, it should be denoted in brackets: Staff Z, RN, stated, "I punched the old fool [Patient #1] in the face."

How to Document Record Review:

- When recording record reviews, use the verb “showed.” For example:
 - Review of Patient #4’s medical record showed...
- Dates and times of the surveyor’s record review can be included in the surveyor’s notes.
- Dates and times of the surveyor’s record review need not be included in the Statement of Deficiency (SOD) unless it is important to the body of evidence.
- Example:
 - Review of Patient #1’s medical record on 01/01/08 at 11:40 AM, showed it did not contain the required dietary assessment. Further/subsequent review of the patient's medical record at 3:00 PM showed a dietary assessment dated 11/25/07 had been placed in the patient's medical record.
- If the citation only has current medical records, there is no need to say current medical record.
- If both current and discharged medical records are in the “based on” statement, state which are current medical records and which are discharged medical records.

General Writing Guide:

- Make certain the “Replace straight quotes with smart quotes” option is checked in Microsoft Word or other software program. Quotes should look like apostrophes in style—note the lack of curves (").
- Use one space after a period.
- Time: 1:00 AM, 11:00 PM, Noon, Midnight
- Date: 07/04/10. Use leading zeroes and a 2-digit (NOT 4-digit) year indicator, NOT 7/4/10, 7/4/2010, or 07/04/2010.
- Capitalize “Patient” and use the patient's number, i.e. Patient #2. Do this throughout the narrative.

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- Do not use "he/she," "she/he," or "his/her."
- When referring to patient records, use "current" or "discharged," not "open" or "closed."
- Using an abbreviation—Example: 'As needed (PRN)'— meaning followed by the abbreviation—then use “PRN” throughout the rest of the citation. Do not use “PRN,” and then later use “prn.” Use one abbreviation and stick with it.
- Do not put periods within an abbreviation/acronym. Example: “RN”— do not use “R.N.”
- Capitalize Staff and use the staff member's identifier letter or number, i.e., Staff C. Include the staff member's title the first time used under each reference number in the citation. If using the title of the individual, use the following example:
 - Staff C, Administrator, stated, (quote)...
 - Staff D, RN (Registered Nurse), stated that...
- Only explain the term the first time used under each reference number in the citation. This also means that if you are adding on to someone else's write-up, you do not need to explain the term if the other surveyor explained it.
 - Review the write-up of the other surveyors sharing the tag with you to make sure you are not repeating the explanation of the term.
- Write out numbers one through nine in text form.
- For numbers 10 and greater, write them in their numerical form. This includes the numbers in the DPS.
 - The exception is when recording measurements.
 - All numbers used as the first word of the sentence should be spelled out.
 - When recording measurements of less than a whole number, record the measurement as a decimal. Example: 0.5

Final Editing Key Notes:

- All statement of deficiency citations must be read and edited for error, clarity, and precision of meaning by the person writing the tag before the task is considered complete. Use spell check before transferring to ASPEN Survey Explorer – Quality (ASE-Q) or ASPEN Central Office (ACO). It is not the responsibility of the Team Leader to find your mistakes or make your corrections; it is your responsibility as a surveyor.
 - Other Important Notes:
 - Use complete sentences.
 - Do not have long, run on sentences.
 - Say what the facility did wrong and/or failed to do. Do not add what the facility did correctly, as this is extraneous information.