

Steps to Investigation Case
Non-Long Term Care Learning Activity

Item	Description
Objective:	Given a case study, the surveyor will exercise knowledge of each step of an investigation.
Prior to Class:	Print one copy of the Preceptor Instructor Sheet (with explanations) and several copies of each Steps to Investigate Activity Case Study packet, including a notes page.
Total Time for Activity:	60 minutes* (*Activity times are highly dependent on class size and dynamics. The time given is approximate.)
Set-Up:	Divide the class into two groups. Distribute a copy of one of the case studies to each team. (Alternate: If this is a small class or one new surveyor, work as a group.)

Step:	Preceptor Instructions:	Activity Time:
1.	Tell surveyors they will have 30 minutes to read, discuss, and follow the steps to investigate their case study. Each group should select someone to take notes and be prepared to report to the class. Groups must address each of the steps to investigate in their response.	5 min.
2.	Give the teams time to read and discuss their case studies. As the groups are completing these tasks, walk around the room and listen to the conversations.	25 min.
3.	Advise the class they have five minutes left before the groups present the cases to the class.	5 min.
4.	Allow each group to present their case to the class.	15 min.
5.	Debrief each case study by discussing key points found in the Preceptor Notes sheet. Answer any questions the surveyors may have about the cases.	10 min.

Date:
Surveyor:

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Team A—Case Study 1

Directions: For the case study, follow the investigation steps and write the required information in the space provided below or use a Surveyor Notes Worksheet (CMS Form-807), if provided.

You are on a home health survey accompanying the nurse on a home visit. The patient, a 75-year-old male, Mr. Jones, is being treated at home for a pressure ulcer on the base of the right foot. The Plan of Care (POC) details the ordered wound care, and you observe the Registered Nurse (RN) perform the following:

Mr. Jones was sitting in a chair with his legs hanging down. The nurse gathered her supplies and sat on the wooden floor. The floor was noted to be dirty and dusty with pet hair from the family's pet dog. With bare hands, the nurse removed the Mr. Jones's shoe, sock, and the old dressing. She washed her hands, sat back on the floor, and opened the patient's dressing supplies. She then placed each opened paper package directly on the floor and poured normal saline on the gauze sponges in the open packages, resulting in saline leaking through the sponge, paper backing, and to the floor. She then picked up the wet sponges and cleaned the patient's wound. The nurse opened another package of 4x4 gauze pads and dried off the wound. She opened a package of cotton swabs, again laying the packaging on the floor, and used them to apply medication to the wound. She then finished wrapping the wound. The entire procedure was carried out without the use of gloves.

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Surveyor Notes

Investigation Step	Notes
1. Note potential problems.	
2. Check the regulation wording.	
3. Check the guidance to surveyors.	
4. Check the professionally recognized standards.	
5. Determine and obtain additional evidence.	

Citation: State Operations Manual (SOM)

Citation: Introduction to Surveying for Non-Long Term Care Course; Module 4, Lesson 2
Investigating Deficiencies

Provider Type: NLTC

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Preceptor Notes

Investigation Step	Notes
1. Note potential problems.	<p>Infection Control—The nurse did not adhere to standard infection prevention practices when providing care.</p> <p>(Make sure the new surveyor recognizes that the HHA is not responsible for the dirty floor and pet hair, even though these present infection control issues.)</p>
2. Check the regulation wording.	<p>Note: Make sure the new surveyor uses the State Operations Manual (SOM) Appendix B to answer questions 2, 3, and 4.</p> <p>Read condition and regulations for Compliance with Accepted Professional Standards and Principles, §484.12 in Appendix B.</p> <p>§484.12 Condition of Participation: Compliance With Federal, State, and Local Laws, Disclosure and Ownership Information, and Accepted Professional Standards and Principles</p> <p>§484.12(c) Standard: Compliance with accepted professional standards and principles. The HHA and its staff must comply with accepted professional standards and principles that apply to professionals furnishing services in an HHA. (Tag G121)</p>
3. Check the guidance to surveyors.	<p>Under Compliance with Accepted Professional Standards and Principles, the expected outcome for this high-priority standard is that all “care providers follow parameters defined by State practice acts, Federal and State laws & regulations, HHA policies and other accepted guidelines (e.g., CDC guidelines for infection control). (Tag G117)</p> <p>“The accepted professional standards and principles that the HHA and its staff must comply with include, but are</p>

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	<p>not limited to, the HHA Federal regulations, State practice acts, commonly accepted health standards established by national organizations, boards, and councils (i.e., the American Nurses' Association standards) and the HHA's own policies and procedures.</p> <p>An HHA may be surveyed for compliance with State practice acts for each relevant discipline. Any deficiency cited as a violation of a State practice act must reference the applicable section of the State practice act which is allegedly violated and a copy of that section of the act must be provided to the HHA along with the statement of deficiencies.</p> <p>Any deficiency cited as a violation of accepted standards and principles must have a copy of the applicable standard provided to the HHA along with the statement of deficiencies.</p> <p>If an HHA has developed professional practice standards and principles for its program staff, there should be information available which demonstrates that the HHA monitors its staff for compliance and takes corrective action, as needed.</p> <p>If questions arise during interviews, home visits or record reviews, consider:</p> <ul style="list-style-type: none"> • Reviewing the HHA policies and procedures for the area of concern. • Identifying and reviewing materials that the HHA provides to staff as clinical/procedural resources.” (Tag G121)
4. Check one or more sources of accepted professional standards.	<p>Since the regulation applicable to this particular scenario makes reference to accepted professional standards, reference to a written standard should be made when possible. Note that the regulations do not require adherence to any specific organization's standards, so</p>

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	<p>citations must be carefully worded. Accepted professional standards are those where there tends to be consensus among the various expert organizations. Examples of relevant expert organizations in infection control or wound care could include:</p> <ul style="list-style-type: none"> • Centers for Disease Control & Prevention • APIC • The Wound Healing Society • Wound Ostomy and Continence Nurses Society • Association for the Advancement of Wound Care • American Professional Wound Care Association
<p>5. Determine and obtain additional evidence.</p>	<p>Complete the investigation, including interviewing the nurse in question, and reviewing medical records, personnel training records, wound care policies, procedures for orienting and training new nurses, and competency assessments.</p>