

TOP 10

Ways to Survive CMS Phase III

The Centers for Medicare & Medicaid Services (CMS) Mega Rule is a comprehensive update of long-term regulations, and Phase III becomes effective in November 2019. All three phases of this update include many positive changes. The CDM, CFPP credential is now recognized in the regulations as one of the primary staffing qualifications for the Director of Food and Nutrition Services. What follows are some highlights and insights from Phase III for you, as the CDM and leader, to help your care community be in compliance with the final rules.

1. Address **Infection Control (\$485.80)**. Require facilities to have a trained infection preventionist on staff that is an active member of your QAPI team! Work with your Infection Preventionist to find common ground on what Food and Nutrition Services infection control practices should be. (i.e. room trays & use of paper products for isolation precautions, allowable cardboard in the foodservice dry storage area).
2. Integrate **Freedom from Abuse, Neglect and Exploitation (\$483.12)** into your facility's QAPI program. Be sure the foodservice department has a QAPI plan in place and is represented at the meetings.
3. Include responsibility and accountability for the QAPI program with the obligations of the governing body (**\$483.70 Administration**). Be sure to hold the foodservice staff accountable to making your QAPI plan successful.
4. Consider **Behavioral Health Services (\$483.40)** as it relates to residents with a history of trauma and/or post-traumatic stress disorder. Be sure to identify and assess the needs of these residents as it relates to their nutritional needs and dining environments.
5. Provide training to staff related to trauma-informed care (**\$483.25 Quality of Care**). Develop and implement a process to assess foodservice staff competencies and skill sets as related to caring for residents with a history of trauma and/or post-traumatic stress disorder.
6. **Comprehensive Resident Centered Care Plans (\$483.21)** needs can be related to trauma-informed care. Be sure to assess and update any special Food & Nutrition Services interventions.
7. Make sure to implement a **Facility Wide Training Requirements (\$483.95)** for the following topics "The 8 Pack," Communications, Resident Rights & Facility Responsibility, Abuse, Neglect & Exploitation, Quality Assurance and Performance Improvement, Infection Control, Compliance & Ethics and Behavioral Health. Know how your organization or facility is going to support these trainings. Remember, these required topics are to be implemented for new and existing staff, contractors, and volunteers.
8. Implement a **Compliance & Ethics Program (\$483.85)**. Know it and share it with your facility/company. The CBDM has a CDM CFPP Code of Ethics that all CDMs must accept and abide by, and effective June 1, 2019, is requiring 1 Ethics CE during your 3-year certification window.
9. Consider your **Physical Environment (\$483.90)**. Confirm that each resident's bedside has a call system that will allow the resident to request staff assistance and the call goes directly to a staff member or centralized staff work area. Be a part of your facility; when you see a call light or hear a call, don't just walk by, assist the resident as much as possible, or at least let them know you are making sure help is on the way.
10. Represent **Food and Nutrition Services (483.60)**. Show PRIDE in what you do and who you are as a leader! Hang your CDM, CFPP certificate on your wall and wear the credentials on your name badge. Demonstrate the knowledge and skills you've acquired to be a confident professional and leader.

