Use this pathway for a sampled resident who requires assistance with ADLs (grooming, dressing, oral hygiene, transfer, bed mobility, ambulation, eating, bathing, and communication systems) to determine if facility practices are in place to identify, evaluate, and intervene to prevent, maintain, or improve ADLs.

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	Review the most current comprehensive (i.e., admission, annual, significant change, or a significant correction to a prior comprehensive) and most recer quarterly (if the comprehensive isn't the most recent assessment) MDS/CAAS for C - cognitive status, G - ADL status, J - pain, O - OT, PT and restorat services,						
Care plan (e.g., ADL assistance, specific care interventions staff will provi- maximize independence, therapy interventions, or restorative approach),				remedication prior to ADLs, environmental approaches and devices used to			
	Physic	cian's orders (e.g., therapy, restorative, and ADL needs), and					
	Pertin	ent diagnosis.					
Mai	ke obse	vation rvations as appropriate, over various shifts to corroborate the inforn r information obtained from staff interviews. Potential pertinent obse		obtained during the record review. You may also find it important to ons are listed below.			
	Obser possib	rve ADLs by CNA, restorative, or therapy (observe as soon as ble)		Does staff provide assistive devices to maximize independence, including but not limited to the following?			
	0	How much assistance does the resident need?		<ul> <li>Grooming – built up grooming aids.</li> </ul>			
	0	Any ADL concerns (e.g., teeth clean, hair clean and brushed, nails clean and trimmed, face shaven, female facial hair removed, no odors, dressed appropriately)?		<ul> <li>Dressing – Velcro instead of laces or buttons, button hook.</li> <li>Transfer and ambulation – transfer board, cane, w/c, walker.</li> </ul>			
	0			<ul> <li>Toileting – elevated toilet seat, grab bar, commode.</li> <li>Eating – built-up utensils, plate guard, nosey cup, three-compartment dish, scoop plate/bowl, weighted or swivel utensils,</li> </ul>			
	<ul> <li>Does staff allow sufficient time for the resident to complete tasks independently (e.g., putting on their own shirt)?</li> </ul>			cup with lid and handles, dycem.  O Communication – communication board, electronic augmentative			
	0	Does staff complete tasks for an independent resident (e.g., pushing a resident who can self-propel in a w/c or feeding a resident who can do it on their own)?		communication device.  Is there any indication that the resident could benefit from therapy or			
	o Does staff tell the resident what they are doing before proceeding?			restorative services that are currently not being provided?  If the resident wears prostheses, are they in place or removed in			
	0	Is the resident receiving all necessary ADL assistance?		accordance with the time of day, activities, and resident preference?			
	0	If the resident has a contracture, did staff provide skin care to keep the areas clean and to prevent skin breakdown?		,			

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Are care-planned interventions in place?

## **Interview**

As part of the investigation, surveyors should attempt to interview the most appropriate direct care staff member first. Your interview question should be specific to the investigation at hand and based on findings from the record review and observations. Interview the nurse, CNAs, and therapy staff. Consider interviewing the DON, MD, CNP or PA to complete the investigation.

Resident and/or representative:			Therapy and/or Restorative Manager:			
			When did the resident's decline in ADLs occur?			
П	ability to [ask about specific ADL]?  How much help do you need from staff [ask about specific ADL]? If help		Were any therapy or restorative interventions in place before the [ADL] decline?			
	needed, ask the following:		When did therapy/restorative start working with the resident?			
	<ul> <li>Does staff encourage you to do as much as you can?</li> </ul>		What is therapy/restorative doing to address the resident's [ADL] decline?			
	<ul> <li>Does staff allow ample time for you to do as much as you can on your own?</li> </ul>		How did you identify that the interventions were suitable for this resident?			
	<ul> <li>Does staff provide timely assistance?</li> </ul>		What are the current goals?			
	Do you have pain with [ADLs]? If so, what does staff do for your pain?		Do you involve the resident/representative in decisions regarding treatments? If so, how?			
	If you know the resident independently does exercises: Do you use certain devices to help you with [ADLs]? Do you have them when you need them?		How often do you meet with the resident?			
			How much assistance does the resident need with [ADLs]?			
	Does staff tell you what they are going to do before they do it?		How do you promote the resident's participation in [ADLs]?			
	What type of interventions are done? (Ask about specific interventions – e.g., assistive devices.)		Does the resident have pain? If so, who do you report it to and how is it being treated?			
	Are you getting therapy or restorative for [ADLs]?		Does the resident refuse? What do you do if the resident refuses?			
	o How often do they help you?		Is the resident's [ADL] ability getting worse? If so, did you report it (to			
	If you know the resident has refused care: Did staff provide you with other		whom and when) and did the treatment plan change?			
	treatment options or did staff provide you with education on what might happen if you do not follow the treatment plans?		How did you train staff to perform the restorative [ADL] program? Is there documentation that nursing staff were trained (ask to see the			
	your decline in [ADLs] caused you to be less involved in activities		documentation)?			
	you enjoy?	Ш	If the resident is not on a therapy or restorative program: How did you decide that he/she would not benefit from a program?			
	Has your decline in [ADLs] caused a change in your mood or ability to function?		How do you monitor staff to ensure they are implementing care-planned			
	Is your [ADL] ability getting worse? If Yes, do you know why you are	_	interventions?			
	getting worse?	Ш	Ask about concerns based on your investigation.			

Nu	rse Aide and/or Restorative Nurse Aide:	Nu	rse:
	Are you familiar with the resident's care?		Are you familiar with the resident's care?
	When did restorative start working with the resident?		How much assistance does the resident need with [ADLs]?
	What is restorative doing to address the resident's [ADL] decline?		If the resident's decline is recent: Who was notified and when were they
	How often do you meet with the resident?		notified?
	w much assistance does the resident need with [ADLs]?		Were any therapy or restorative interventions in place before the [ADL]
	How do you promote the resident's independence with ADLs to the extent possible?		decline?  What is therapy/restorative doing to address the resident's [ADL] decline?
	Does the resident have pain with [ADLs]? If so, who do you report it to		How did you identify that the interventions were suitable for this resident?
	and how is it being treated?		Do you involve the resident/representative in decisions regarding
	Does the resident refuse? What do you do if the resident refuses?		treatments? If so, how?
	Is the resident's [ADL] ability getting worse? If so, did you report it (to whom and when) and did the treatment plan change?		Does the resident have pain with [ADLs]? If so, who do you report it to and how is it being treated?
	How were you trained on the resident's [ADL] restorative program?		Does the resident refuse? What do you do if the resident refuses?
	Ask about concerns based on your investigation.		Is the resident's [ADL] ability getting worse? If so, did you report it (to whom and when) and did the treatment plan change?
			If the resident is not on a therapy or restorative program: How did you decide that he/she would not benefit from a program?
			How do you monitor staff to ensure they are implementing care-planned interventions?
			Ask about concerns based on your investigation.

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### **Record Review**

Are preventive measures documented prior to a decline?

You may need to return to the record to corroborate information from the observations and interviews. Potential pertinent items in the record are listed below. Review the therapy assessment, notes, and discharge plan. ☐ Has the care plan been revised to reflect any changes in ADL functioning? o Has the resident's ADL status changed in the last 12 months? ☐ Does your ADL observation match the description of the resident's abilities in the clinical record? o Has therapy assessed the ADL decline, provided treatment as often as ordered, and implemented a plan after therapy? ☐ Is pain related to ADLs assessed and treatment measures documented? o Is there documentation that indicates ADLs have improved, been ☐ Were changes in ADL status or other risks correctly identified and maintained, or declined? communicated with staff and MD? ☐ Are there underlying risk factors identified (e.g., unstable condition, ☐ Review facility policies and procedures with regard to ADLs. cognition, or visual problems)?

#### Make compliance decisions below by answering the seven Critical Elements.

**Note:** Remember if the facility failed to complete a comprehensive assessment resulting in a citation at F272, surveyors should not cite F279 and F280 as the facility could not have developed or revised a plan of care based on a comprehensive assessment they did not complete.

#### **Critical Element**

1. If the condition or risks were present at the time of the required assessment, did the facility comprehensively assess to the resident's physical, mental, and psychosocial needs to identify the risks and/or to determine underlying causes (to the extent possible) for the resident's ADL needs and the impact upon the resident's function, mood, and cognition?

#### If No, cite F272

NA, condition/risks were identified after completion of the required comprehensive assessment and did not meet the criteria for a significant change MDS OR a comprehensive assessment is not required yet.

2. Did the facility develop a plan of care with interventions and measurable goals, in accordance with the assessment, resident's wishes, and current standards of practice, to ensure provision of care to meet ADL needs, prevent decline in ADL abilities, or improve functioning?

#### If No, cite F279

NA, the comprehensive assessment was not completed OR a comprehensive care plan is not required yet.

3. Did the facility provide or arrange services to be provided by qualified persons in accordance with the resident's written plan of care?

#### If No, cite F282

NA, no provision in the written plan of care for the concern being evaluated.

4. Did the facility reassess the effectiveness of the interventions and review and revise the plan of care (with input from the resident or representative, to the extent possible), if necessary, to meet the needs of the resident?

#### If No, cite F280

NA, the comprehensive assessment was not completed OR the care plan was not developed OR the care plan did not have to be revised.

5. Based on observation, interviews, and record review, did the facility ensure that a resident's ADL abilities did not diminish unless circumstances of the resident's clinical condition demonstrate that decline was unavoidable?

#### If No, cite F310

NA, the resident has not declined in ADL functioning.

6. Based on observation, interviews, and record review, did the facility provide the appropriate treatment and services to maintain or improve ADL functioning for the resident who has the potential to maintain or improve?

#### If No, cite F311

NA, the resident does not have a potential to maintain or improve ADL functioning.

Based on observation, interviews, and record review, did the facility provide the resident who is unable to carry out ADLs the necessary services to

m	aintain good nutrition, grooming, and personal and oral hygiene?
	No, cite F312
N.	A, the resident is able to carry out ADLs.
	ags and Care Areas to consider: Dignity (F241), F271, F274, F278, Abuse (F223, F224, F226), F281, Urinary Incontinence (F315), Sufficient Staffing 354), F369, F373, Rehab and Restorative (F406), F498, F514.
Notes:	