Dietary and Food Services: Complying with the CMS and Joint Commission Standards 2014

TELNET 2928 September 25, 2014 10-11:30 am EDT





Speaker



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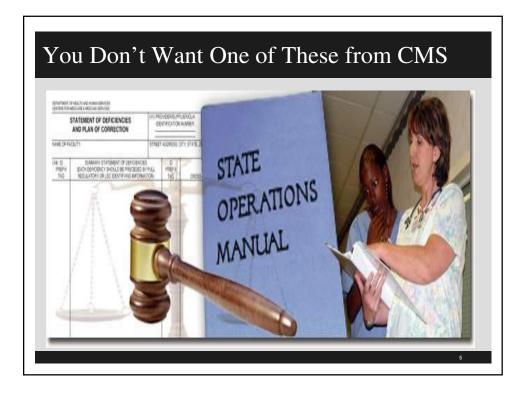
The CMS Conditions of Participation (CoPs) for Dietary and Nutrition Services





CMS CoP

- The Centers for Medicare and Medicaid Services is called CMS for short
- CMS has a manual called the Conditions of Participation or CoPs
- Every hospital that received Medicare or Medicaid reimbursement must follow this CoP manual
- There is a separate manual for PPS hospitals and one for critical access hospitals (CAH)
- Must follow these for all patients and not just Medicare or Medicaid patients



CMS Hospital CoPs

- All Interpretative guidelines are in the state operations manual and are found at this website¹
 - Appendix A, Tag A-0001 to A-1164 and 460 pages long
 - You can look up any tag number under this manual
 - Food and Dietetic Services starts at tag A-0618
- Manuals
 - Manuals are now being updated more frequently
 - Still need to check survey and certification and transmittals website once a month to keep up on new changes 2

¹ http://www.cms.hhs.gov/manuals/downloads/som107_Appendicestoc.pdf

Medicare State Operations Manual Appendix

- Each Appendix is a separate file that can be accessed directly from the SOM Appendices Table of Contents, as applicable.
- The appendices are in PDF format, which is the format generally used in the IOM to display files. Click on the red button in the 'Download' column to see any available file in PDF.
- To return to this page after opening a PDF file on your desktop. use the browser "back" button. This is because closing the file usually will also close most browsers

New website at

www.cms.hhs.gov/manuals/downloads/som107 Appendixtoc.pdf

App. No.	Description	PDF File
А	Hospitals	<u> </u>
AA	Psychiatric Hospitals	<u> €06 KB</u>

CMS Hospital CoP Manual

State Operations Manual Appendix A - Survey Protocol, Regulations and Interpretive Guidelines for Hospitals

Table of Contents

(Rev. 105, 03-21-14)

Transmittals for Appendix A

Survey Protocol

www.cms.hhs.gov/ma nuals/downloads/som1 07 Appendixtoc.pdf

Introduction

Task 1 - Off-Site Survey Preparation

Task 2 - Entrance Activities

Task 3 - Information Gathering/Investigation

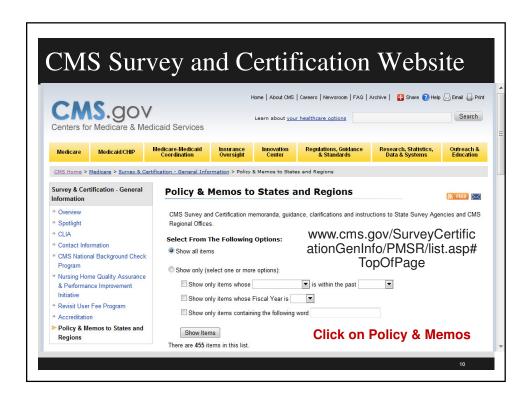
Task 4 - Preliminary Decision Making and Analysis of Findings

Task 5 - Exit Conference

Task 6 - Post-Survey Activities

Survey Procedure

- Step one is publication in Federal Register
- Step two is where CMS publishes the interpretive guidelines
- The interpretive guidelines provide instructions to the surveyors on how to survey the CoPs
 - These are called survey procedure
 - Not all the standards have survey procedures
 - Questions such as "Ask patients to tell you if the hospital told them about their rights"



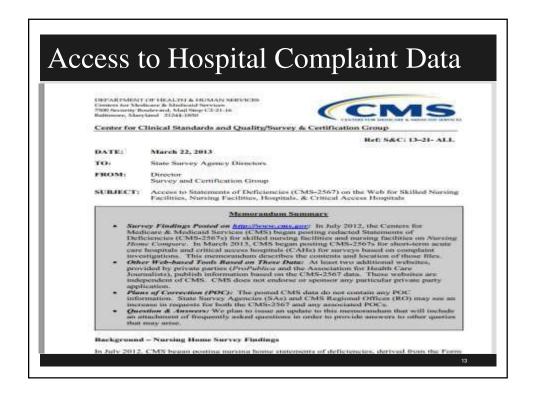
Access to Hospital Complaint Data

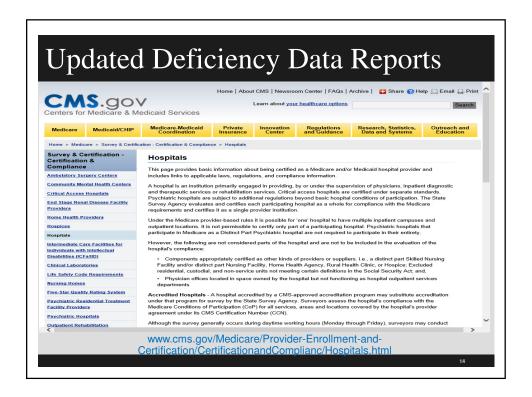
- CMS issued Survey and Certification memo on March 22, 2013 regarding access to hospital complaint data and updating quarterly
- Includes acute care and CAH hospitals
 - Does not include the plan of correction but can request
 - Questions to bettercare@cms.hhs.com
- This is the CMS 2567 deficiency data and lists the tag numbers
 - Available under downloads on the hospital website at www.cms.gov

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Access to Hospital Complaint Data

- There is a list that includes the hospital's name and the different tag numbers that were found to be out of compliance
 - Many on restraints and seclusion, EMTALA, infection control, patient rights including consent, advance directives and grievances and standing orders
- Two websites by private entities also publish the CMS nursing home survey data and hospitals
- The ProPublica website for LTC
- The Association for Health Care Journalist (AHCJ) websites for hospitals





Dietary Deficiencies						
Section	Tag	Nov 2013	Jan 2014	Mar 2014		
Food & Dietetic Services	618	10	11	14		
Organization	619	6	6	7		
Director of Dietary Services	620	17	18	27		
Qualified Director	621	8	8	16		
Competent Staff	622	6	6	8		
Diets	628	11	11	14		
Therapeutic Diet	629	5	5	7		
Diets	630	16	16	18		
Diet Manual	631	6 Total 119	6	8		

CMS Changes July 11, 2014

- CMS published some final changes to hospital CoP on May 7, 2014
 - www.ofr.gov/(S(5jsvvwmsi4nfjrynav20ebeq))/OFRUpload/OFRData/2 014-10687_PI.pdf
- Says will save healthcare providers \$660 million annually and 3.2 billion over five years
- Several are important to the CMS dietary CoPs
- Would permit registered dietitians or nutritional specialist to order patient diets independently, which they are trained to do, without requiring the supervision or approval of a physician or other practitioner

Final Federal Register Changes

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Centers for Medicare & Medicaid Services

42 CFR Parts 413, 416, 440, 442, 482, 483, 485, 486, 488, 491, and 493

[CMS-3267-F] www.ofr.gov/(S(5jsvvwmsi4nfjrynav20ebeq))/OFR

RIN 0938-AR49 Upload/OFRData/2014-10687_Pl.pdf

Medicare and Medicaid Programs; Regulatory Provisions to Promote Program Efficiency,

Transparency, and Burden Reduction; Part II

AGENCY: Centers for Medicare & Medicaid Services (CMS), HHS.

ACTION: Final rule.

SUMMARY: This final rule reforms Medicare regulations that CMS has identified as unnecessary, obsolete, or excessively burdensome on health care providers and suppliers, as well as certain regulations under the Clinical Laboratory Improvement Amendments of 1988 (CLIA). This final rule also increases the ability of health care professionals to devote resources to improving patient care, by eliminating or reducing requirements that impede quality patient care or that divert resources away from providing high quality patient care. We are issuing this rule

to achieve regulatory reforms under Executive Order 13563 on improving regulation and

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CMS Changes Food & Dietetic Services

- CMS said it came to their attention that CMS CoPs were too restrictive and lacked the flexibility to allow hospitals to extend privileges to RD (Registered Dietician) in accordance with state law
- CMS believes RD are best qualified to assess patient's nutritional treatment plan and design and implement a nutritional treatment plan in consult with the care team
- Used the term RD but noted that not all states call them RD and some states call them licensed dieticians (LD) and some states recognize other qualified nutrition specialists

CMS Changes Food & Dietetic Services

- CMS includes a qualified dieticians (such as a RD) as a practitioner who may be privileged to order patient diets (Enteral and parenteral nutrition, supplemental feedings and therapeutic diets)
- CMS said this would free up time for physicians and other practitioners to care for patients
- Dietician or nutritional specialist can be granted nutrition ordering privileges by the Medical Staff (MS)
- This can be with or without appointment to the MS

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CMS Changes Food & Dietetic Services

- Must be consistent with state law as state can determine scope of practice
- State can determine the credentials and qualifications for dietitians and nutrition professionals
- MS could privilege speech-language pathologist who may order diet texture modification for patients with significant swallowing problems
- MS is not required to provide privileges but has the flexibility to do so if they choose

:0

CMS Changes Food & Dietetic Services

- Final language:
 - (1) Individual patient nutritional needs must be met in accordance with recognized dietary practices.
 - (2) All patient diets, including therapeutic diets, must be ordered by a practitioner responsible for the care of the patient, or by a qualified dietician or qualified nutrition professional as authorized by the medical staff and in accordance with State law governing dieticians and nutrition specialist

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Sample Page from CMS Manual

A-0618

(Rev. 37, Issued: 10-17-08; Effective/Implementation Date: 10-17-08) §482.28 Condition of Participation: Food and Dietetic Services

The hospital must have organized dietary services that are directed and staffed by adequate qualified personnel. However, a hospital that has a contract with an outside food management company may be found to meet this Condition of Participation if the company has a dietician who serves the hospital on a full-time, part-time, or consultant basis, and if the company maintains at least the minimum standards specified in this section and provides for constant liaison with the hospital medical staff for recommendations on dietetic policies affecting patient treatment.

Interpretative Guidelines §482.28

The hospital's food and dietetic services must be organized, directed and staffed in such a manner to ensure that the nutritional needs of the patients are met in accordance with practitioners' orders and acceptable standards of practice.

Food and Dietetic Services 618

- Food and dietetic services section starts at tag 618
- Hospital must have organized dietary services
- Must be directed and staffed by qualified personnel
- If contract with outside company need to have dietician and maintain minimum standards and provide for liaison with MS on recommendations on dietary policies
 - See contract management standards tag 83-86
- Dietary services must be organized to ensure nutritional needs of the patient are met in accordance with physician orders and acceptable standard of practice (common problematic standard)

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Qualified Dietician or Nutrition Specialist

- Recall that CMS will change the interpretive guidelines to match the changes in the federal register
- And will add after the section that says by an order of the physician
- Or by an order of a qualified dietician or qualified nutrition professional as authorized by the medical staff and in accordance with State law governing dieticians and nutrition specialist

Dietary Policies Required A-618

- Need the following 7 policies:
 - Availability of diet manual and therapeutic diet menus
 - Sometimes called Nutrition Care Manual (NCM) or Pediatric Nutrition Care Manual (PNCM)
 - Frequency of meals served
 - System for diet ordering and patient tray delivery
 - Accommodation of non-routine occurrences
 - Parenteral nutrition (tube feeding), TPN, peripheral parenteral nutrition, changes in diet orders, early/late travs. nutritional supplements etc.

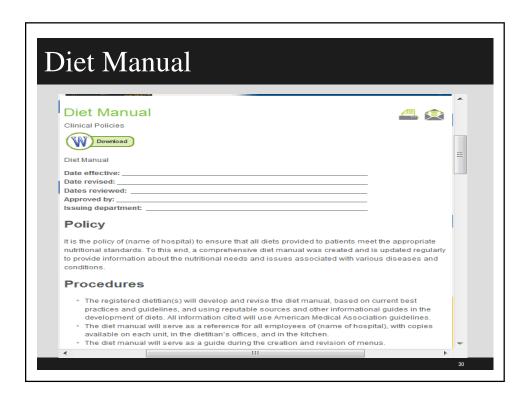
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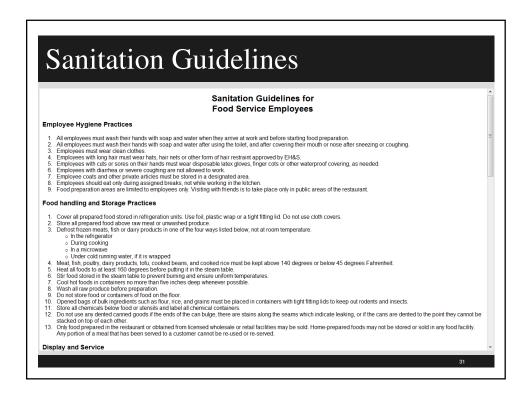
Seven Dietary Policies Required 618

- Integration of food and dietetic services into hospital wide QAPI and infection control programs
- Guidelines on acceptable hygiene practices of personnel
- Guidelines for kitchen sanitation
 - Important to protect against germs and bacteria that cause illness
- Compliance with state or federal laws

So What's in Your Diet Manual? Utah State Hospital Policies and Procedures Clinical Dietetics CHAPTER I: SERVICE AREA PROFILE SECTION 1: STAFFING OF CLINICAL SERVICES Chief Clinical Dietitian 1.1.1 Qualifications of Chief Clinical Dietitian 1.2 Staff Dietitian 1.2.1 Qualifications of Staff Dietitian 1.3 Diet Technician 1.3.1 Qualifications of Diet Technician 1.4 Dietetic Students at Utah State Hospital Dietitian's Offices 1.5 1.6 Clinical Dietitian's Library **CHAPTER II: SERVICE AREA PROTOCOLS** SECTION 2: CLINICAL DIETETICS PROCEDURES AND STANDARDS Clinical Dietetics Policies and Procedures 2.1 Diet Manual Approval and Use 2.2.1 Location of Diet Manual Provision of Nutritional Care General Standards of Care - 3 pages Communication With Dietary Department by Patients 2.6 Late Patient Admission Supper

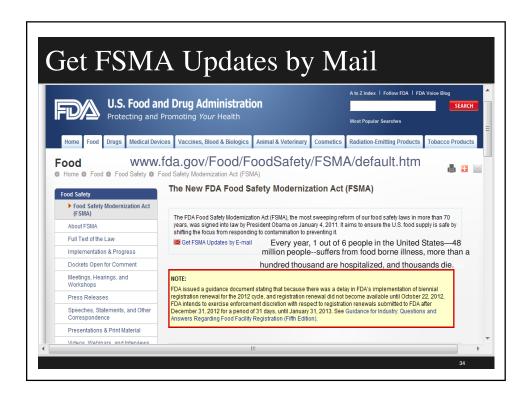
Low Sodium Diets and Non Neutral Exchanged Water Source SECTION 3: SPECIAL NUTRITIONAL CARE PATIENTS 3.1 NPO Orders 3.2 Tube and Enteral Feedings 3.3 Nutritional Care of the Tube Fed Patient Dietetic Care of the Obese Patient 3.4 SECTION 4: CLINICAL DIETETICS PATIENT RECORDS AND Patient Kardex File - 2 pages 4.1.2 Sample Meal Plans for Temporary Use 4.2 Provisions of Special Diets - 2 pages 4.2.1 Food for Special Diets 4.3 Snacks and Nourishments 4.4 Weekly Refreshment Orders 4.5 Extra Food for Individual Patients 4.6 Provision of Punch and other Supplies for Administration of Medication SECTION 5: CLINICAL DIETETICS PATIENT CARE Nutritional Screen 5.1.1 Nutritional Assessment 5.1.1.1 Procedure for Obtaining Nutritional History 5.1.1.2 Food Intake Evaluation 5.2 Diet Instruction to Patients on Clinical Diets 5.2.1 Discharge Diet Instructions 5.3 Forwarding of Diet Information Drug Food Interaction Counseling for Patients







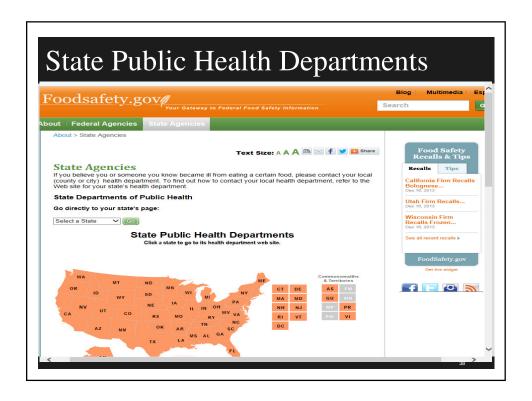


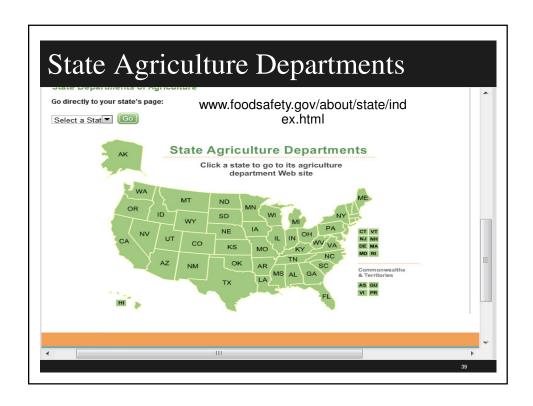


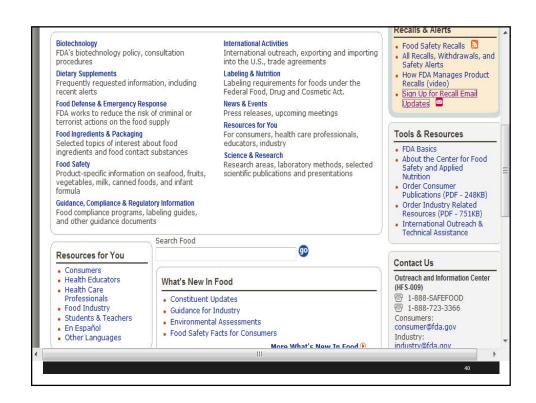


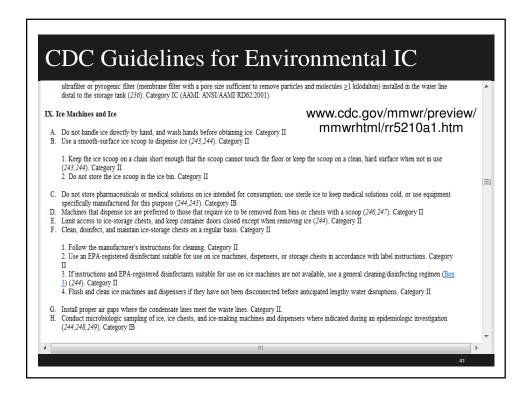


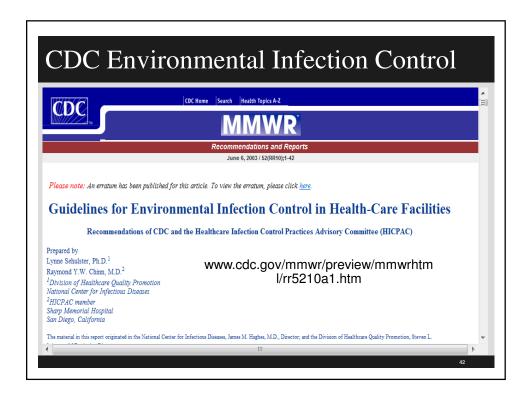












Dietary 618

- Must comply with all state or federal laws
 - Most states have a specific state law on food sanitation rules
- Same standard applies whether food and dietetic services are provided directly or through a contract
 - CMS and Joint Commission have a separate section on contracted services
 - Hospital needs to make sure are performed appropriately
 - Contracted services are evaluated through the PI process
 - Contract sections start at CMS tag 83 and TJC LD.04.03.09 with 10 elements of performance

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State Specific Food Sanitation Rules DIVISION 150 FOOD SANITATION RULES **Definitions and Administration** 333-150-0000 Oregon Food Sanitation Rule http://arcweb.sos.state.or.us/rules/OARs (1) Authority and Purpose. _300/OAR_333/333_150.html (a) This rule is authorized by ORS 624.100. (b) This rule establishes definitions, sets standards for management and personnel, food protection, and equipment and facilities, water supply, sewage disposal, provides for food establishment plan review, and employee restriction to safeguard public health and provide consumers food that is safe, unadulterated, and honestly presented. (2) Incorporation by Reference. The requirements as found in the U.S. Public Health Service, Food and Drug Administration, Food Code 1999, Chapters 1 through 8 is adopted and incorporated by reference. $(3) \ Deletions. The following sections, paragraphs or subparagraphs of the 1999 FDA Food Code are deleted in their entirety: <math>1-201.10(B)(36), 2-103.11(H), 2-201.11, 2-201.12(B), (C) \ and \ D), 2-201.13(C) \ and \ (D), 3-201.16, 3-301.11(C), 3-401.11(D)(3), 4-301.12(C)(5), (D) \ and \ (E), 4-501.115, 4-603.16(E), 4-603.16(E), 4-603.16(E), 4-603.16(E), 4-603.1$

Organization A-0620

- Must have full time director of food and dietetic services who is responsible for daily management of dietary services
- Must be granted authority and delegation by the Board and MS for the operation of dietary services and this should include
 - Training programs for dietary staff and ensuring P&Ps are followed
 - Daily management of dietary
 - Make sure the P&P on next slide are followed
 - So the job description should be position specific and clearly delineate this authority for direction of food and dietary services

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Dietary Policies 620

- Safety practices for food handling
- Emergency food supplies
- Orientation, work assignment, supervision of work and personnel performance
- Menu planning
- Purchase of foods and supplies
- Retention of essential records (cost, menus, training records, QAPI reports)
- Service QAPI program

Dietician Qualifications 620

- The director must demonstrate through education, experience, and training that he or she is qualified to manage the department
- The director's education, experience and training must be appropriate to the scope and complexity of the food service operation
- Surveyor is to verify the director is a full time employee
- Surveyor is to review their job description
- Surveyor is to make sure he or she has the necessary education, experience, and training to manage dietary

Dietitian 621

- Qualified dietician must supervise nutritional aspects of patient care
- Responsibilities include:
 - Approve patient menus and nutritional supplements
 - Patient and family dietary counseling
 - Perform and document nutritional assessments
 - Evaluate patient tolerance to therapeutic diets when appropriate
 - Collaborate with other services (MS, nursing, pharmacy, social work)
 - Maintain data to recommend, prescribe therapeutic diets

Dietitian 621

- If qualified dietician does not work full time, need to be sure there is adequate provisions for dietary consultations
- Frequency of consultations depends on the total number of patients and their nutritional needs
- Surveyor is to make sure that the total number of hours is appropriate to serve the needs of the patients
- Must ensure adequate coverage when the dietician is not available

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Qualified Dietary Staff 622

- Must have administrative and technical personnel competent in their duties
 - Ensure staff is competent through education, experience and specialized training
 - Personnel files should include documentation that the staff member is competent

Diets 628

- Menus must meet the needs of the patient
- Menus must be nutritional, balanced
- Menus must meet the special needs of patients
- Current menus should be posted in the kitchen
- Screening criteria should be developed to determine what patients are at risk
 - Once patient is identified nutritional assessment should be done (TJC PC.01.02.01)
 - Patient should be re-evaluated as necessary to ensure their nutritional needs are met

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Nutritional Assessment 628

- TJC requires to be done within 24 hours by nursing (PC.01.02.03)
- CMS has a good list of examples of patients who may require a nutritional assessment:
- If requires artificial nutrition by any means (tube feeding, TPN, or peripheral parental nutrition)
- If medical or surgical condition interferes with ability to digest, absorb, or ingest nutrients

Nutritional Assessment 628

- If diagnosis or signs and symptoms indicate a compromised nutritional status
 - Such as anorexia, bulimia, electrolyte imbalance, dysphasia, malabsorption, ESRD etc.
- Patients adversely affected by their nutritional intake
 - Diabetes, CHF, taking certain medications, renal disease, etc
- Patients who refuse food should be offered substitutes of equal nutritional value to meet their basic nutritional needs

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Food Groups			# Servings per	# Servings pe
		day	week	
Breads, cereal, pasta, ri	ice, other grains	;		
Fruits				
Vegetables				
Milk, cheese, yogurt				
Meat, poultry, fish, egg	s			
Lentils, beans, tofu				
Peanut butter, nuts				
Fats such as margarine,	mayonnaise, se	our cream		
Oils				
Fried foods or salty sna	ck foods such a	s chips		
Desserts				
Sweet beverages such a 100% fruit juice	as soda or fruit	drinks		
	day	week		
	as soda or muit i	UTITIES		
Alcohol				
Water			_	_
Caffeine beverages suc	h as soda coffe	e tea or energy drinks		+
Sports products such as		c, tea, or chergy drilles		
Chewing gum	a.aiks or bars			+
ehaviors Past or Present	t Yes	No	Frequency	Most recent
Count calories			rrequerity	THOSE TECETIC
Count fat grams				+
Dieting		- 		+
Diet pills				+
Binge eating				+
Fat restriction			+	+
Fluid restriction			+	
Discomfort with your			+	_
body size				

Nutritional Care Process Academy of N&D SNAPShot NCP Step 1: Nutrition Assessment What is the purpose of austrition assessment? The purpose is to obtain, verify, and interpret data needed to identify mutrition-related problems, their causes, and significance. It is an ongoing, nonlinear, dynamic process that involves install data collection, but also continual resourcement and analysis of the purition leaves them is a many to the purition of even the same, data to intermine changes in particular values or majorition intervention. Here who see a food and nutrition professional determine where to obtain nutritions assessment data? It depends on the practice setting, for individuals, data can come directly from the patient/client through interview, observations and measurements, a medical record, and the referring assessment and rate the links unstrong necessary with nutrition diagnoses. Here were Nutrition Assessment data organized? In five categories. Food Nutrition. Anthropometric professional determine where to obtain nutritions assessment patients with the nutrition assessment data organized? The five categories. Food and nutrition. Related History Anthropometric professional determine where the professional determine measurements. Professional determine measurements and the referring in the professional determine the professional determine the professional determine measurements. Prod and nutrition. Related History Anthropometric professional determine where the determine the professional determined the profe

Therapeutic Diets 629

- Therapeutic diets must be prescribed by practitioner in writing by the practitioner responsible for patient's care
 - Dietician use to only be able to make recommendations but now diet can be ordered by the doctor or qualified dietician or qualified nutritional specialist as discussed previously
- Document in the MR including information about the patient's tolerance
- Evaluate for nutritional adequacy
- Manual must be available for nursing, FS, and medical staff

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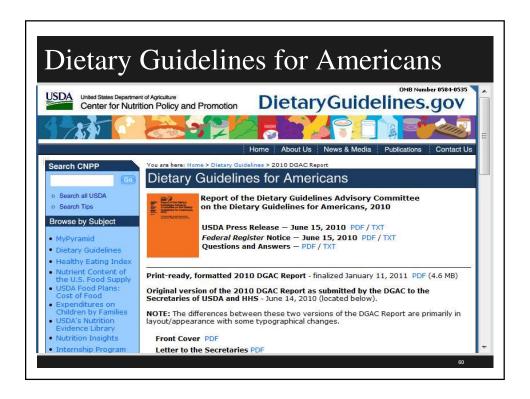
Therapeutic Diets 629

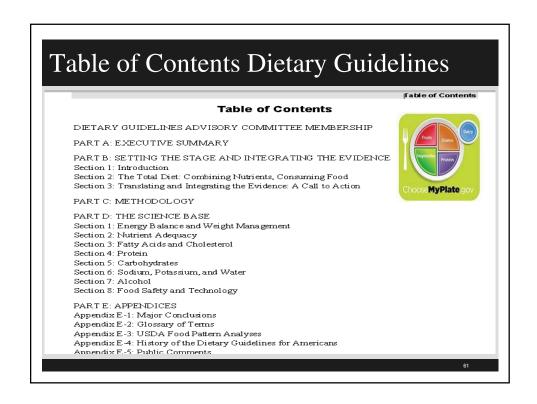
- Dietician may assess a patient's nutritional needs write order if C&P by the hospital
- Nurse can call the physician to get the order and write it as a verbal order in the chart if no diet order
- CMS previously said if doctor writes that the dietician to write the order for the therapeutic diet this will be permissible
 - Doctor can sign off order if hospital does not C&P them
 - Unfortunately, a few state do not permit this holding it is outside the state scope of practice for a registered dietician

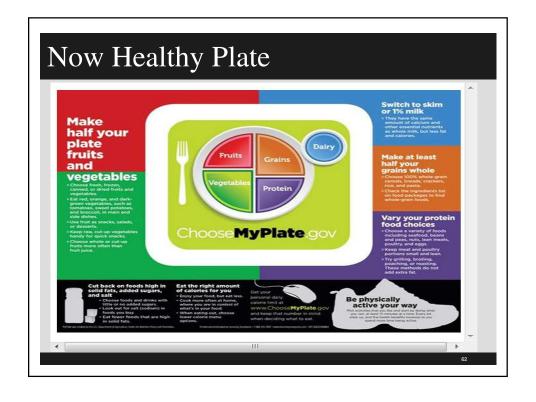
Nutritional Needs 630

- Nutritional needs must be met in accordance with recognized dietary practices and in accordance with orders of the practitioner
- Follow recommended dietary allowances -current Recommended Dietary Allowances (RDA) or Dietary Reference Intake (DRI) of Food and Nutritional Board of the National Research Council
- "Dietary Guidelines for Americans 2011"
- Surveyor will ask hospital what national standard you are using

1www.dietaryguidelines.gov









Dietary Guidelines for Americans

- USDA and Health and Human Services announced the release of the Dietary Guidelines to help Americans make healthier food choices
- More than 1/3 of children and 2/3 of adults are overweight or obese
- Americans need to reduce the risk of developing diet related chronic diseases
- Has 23 key dietary recommendations and six recommendation for specific populations such as women who are pregnant

Dietary Guideline Recommendations

- Enjoy your food, but eat less.
- Avoid oversized portions.
- Make half your plate fruits and vegetables.
- Switch to fat-free or low-fat (1%) milk.
- Compare sodium in foods like soup, bread, and frozen meals – and choose the foods with lower numbers.
- Drink water instead of sugary drinks.

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Press Release for Dietary Guidelines 2011



EMBARGOED UNTIL 10:00 AM EST, JANUARY 31, 2011

USDA Office of Communications (202) 720-4623 HHS Press Office (202) 690-6343

USDA and HHS Announce New Dietary Guidelines to Help Americans Make Healthier Food Choices and Confront Obesity Epidemic

WASHINGTON, Jan. 31, 2011 — Agriculture Secretary TomVilsack and Secretary of the Department of Health and Human Services (HHS) Kathleen Sebelius today announced the release of the 2010 Dietary Guidelines for Americans, the federal government's evidence-based nutritional guidance to promote health, reduce the risk of chronic diseases, and reduce the prevalence of overweight and obesity through improved nutrition and physical activity.

Because more than one-third of children and more than two-thirds of adults in the United States are overweight or obese, the 7th edition of Detarry Guidelines for Americans places stronger emphasis on reducing calorie consumption and increasing physical activity.

"The 2010 Dietary Guidelines are being released at a time when the majority of adults and one in three children is overweight or obese and this is a crisis that we can no longer ignore," said Secretary Vilsack. "These new and improved dietary recommendations give individuals the information to make thoughtful choices of healthier foods in the right portions and to complement those choices with physical activity. The bottom line is that most Americans need to trim our waistlines to reduce the risk of developing diet-related chronic disease. Improving our eating habits is not only good for every individual and family, but also for our country."

The new 2010 Dietary Guidelines for Americans focus on balancing calories with physical



Nutritional Needs Survey Procedure 630

- Surveyor is suppose to ask the hospital to show them what national standard they are using
- Surveyor to view patient medical records to verify diet orders are provided as prescribed by the practitioner
- Surveyor is to determine if patient's nutritional needs have been met
- Will determine if dietary intake and nutritional status is being monitored

Diet Manual 631

- A current therapeutic diet manual must be readily available to all medical, nursing, and food service personnel
- The manual must be approved by the dietitian and medical staff
- The diet manual can not be more than five years old
- The therapeutic diet manual must be available to all medical, nursing, and food service staff
- Diet manual must be in accordance with current standards and include types of diets routinely ordered

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Joint Commission Provision of Care Chapter

Related to Dietary





Introduction to the PC Chapter

- The Provision of Care, Treatment, and Services Chapter is referred to as the PC standards
- There are 48 standards
- It is a very important standard and focuses on care delivered to meet patient needs and includes some dietary standards
- There are four core parts of the care process: assessing patient needs, planning, providing, and coordinating care, treatment and services
- Interventions can be based on the plan of care

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Time Frames for Assessment PC.01.02.03

- EP1 The time frame for the initial nursing assessment needs to be in writing
 - In accordance with law and regulation
 - References RC.01.03.01 EP1 that requires the hospital to have a written policy the requires the timely entry of information into the medical record like the initial assessment
- EP2 The assessment must actually be done within this time frame specified
 - References RC.01.02.03 EP2 which requires this be documented in the medical record timely

Time Frames for Assessment PC.01.02.03

- EP7 A nutritional screen is done when warranted by the patient's need within 24 hours after admission
 - Nurse does initial screens for nutrition risk and consult dietician
 - Screening criteria might include weight loss, poor intake prior to admission, chewing or swallowing problems, skin breakdown, aspiration problems, nutrition support, NPO, certain diagnosis etc.
 - CMS has criteria to use in determining when dietician should be consulted

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Food and Nutrition PC.02.02.03

- Standard: The hospital makes food and nutrition products available to its patients
 - Food and nutrition services is hit hard during the CMS and TJC survey
 - TJC has a dietary and nutrition tracer which is very detailed
 - Important to pay attention to make sure the patient is eating their meals
- EP1 The hospital assigns responsibility for the safe and accurate provision of food and nutrition products

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Food and Nutrition PC.02.02.03

- Hospital has a dietician to run the food and nutrition program
- EP6 Prepares food and nutrition products using proper sanitation, temperature, light, moisture, ventilation, and security
 - Food must be cooked in hot enough temperature to kill bacteria and other food borne diseases, hand hygiene
 - Most states have specific regulation on this
 - Don't want meat on top to drip on food below in the refrigerator, clean can openers, hair restraints
 - Cutting boards must be appropriate cleaned

Food and Nutrition PC.02.02.03

- EP7 Food and nutrition products are consistent with each patient's care
- EP8 Must accommodate a patient's special diet and altered diet unless contraindicated
 - Many patients have special diets such as 1500 calorie ADA or 2 gram low sodium diet
- EP9 Accommodates the patient's cultural, religious, or ethnic food and nutrition preferences
 - Unless contraindicated
 - When possible

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Food and Nutrition PC.02.02.03

- EP10 When a patient refuses food, the hospital offers substitutes of equal nutritional value
 - Important to observe if patient is refusing meals
- EP11 The hospital stores food and nutrition products, using proper sanitation, temperature, light, moisture, ventilation, and security
 - Including those brought in by patients or their families
 - Should mark refrigerators "Food No Medications"
 - Make sure the temperature is checked for the refrigerators
 - Things dated to show when things in the refrigerator should be discarded

Food and Nutrition PC.02.02.03

- EP22 A current therapeutic diet manual approved by the dietitian and medical staff is available to all medical, nursing, and food service staff
 - For hospitals that use TJC for deemed status
 - Diet manual can provide useful information for nursing and must be in accordance with national standard
 - A CMS requirement under food and diet services
 - Many state laws also require a current therapeutic diet manual approved by the dietician and CMS says must be approved by the MS

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Patient Education PC.02.03.01

- EP1 Need to do a learning needs assessment for each patient that includes
 - The patient's cultural and religious beliefs
 - Emotional barriers
 - Desire and motivation to learn
 - Physical or cognitive limitations and
 - Barriers to communication
 - Considering having a patient education interdisciplinary education sheet to capture all required elements

Patient Education PC.02.03.01

- EP4 Provide education to the patient based on their need
 - A new mother may need more education to one who has had five children
- EP5 Education and training must be coordinated by all disciplines involved in the patient's care
 - New diagnosis of diabetes and pharmacist covers medication issues, dietician covers dietary issues and the diabetic nurse educator covers diabetes education
 - Age of patient and education level (issue of low health literacy or interpreter) will impact educational needs

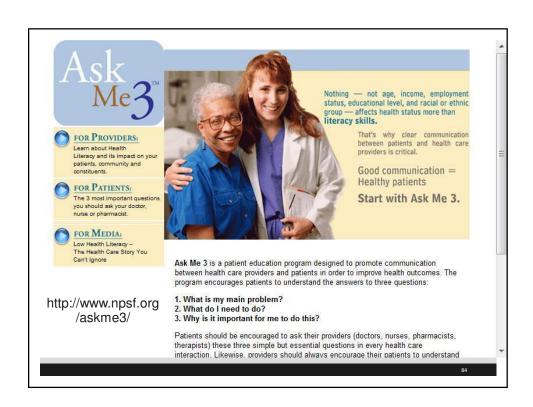
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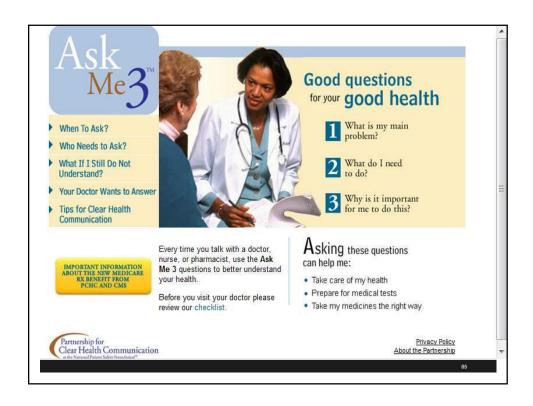
Patient Education PC.02.03.01

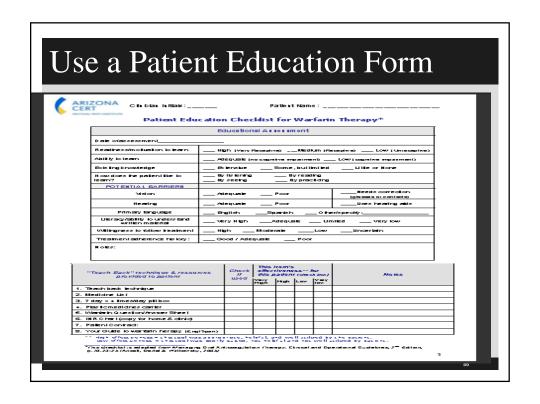
- EP10 Education and training to patient will include the following based on the patient's condition and assessed needs
 - Explanation of the plan for care
 - Basic health practices and safety
 - Safe medication use
 - Nutritional interventions, diets, supplements
 - Pain issues such as pain management and methods
 - Information on oral health (much information later on this including oral bacterium (periodontal disease) as cause of cardiovascular disease, MI, VAP, stroke, CAD)

Patient Education PC.02.03.01

- EP10 Education and training to the patient
 - Safe use of medical equipment
 - Safe use of supplies
 - Rehab to help the patient reach maximum independence
- EP25 Must evaluate the understanding of the education and training provided
 - Teach back is one method to verify understanding
 - Ask me three program by the National Patient Safety Foundation







Patient Education Checklist for Warfarin Therapy*											
	Educational Assessment										
Date of assessment											
Readiness/motivation to learn	High (Very Receptive)Medium (Receptive) Low (Unreceptive)										
Ability to learn	Adequate (no cognitive impairment) Low (cognitive impairme	ent)									
Existing knowledge	Extensive Some, but limited Little or None										
How does the patient like to learn?	By listening By reading By seeing By practicing										
POTENTIAL BARRIERS											
Vision	AdequatePoorNeeds correction (glasses or contacts										
Hearing	Adequate PporUses hearing aid	ds									
Primary language	EnglishSpanishOther/specify:										
Literacy/ability to understand written material	Very HighAdequateLimited Very low										
Willingness to follow treatment	High ModerateLowUncertain										
Treatment adherence history:	Good / Adequate Poor										

	-					_		
	Treatment adherence history: G	ood / Ade	quate		_ Poor			
		stoc.com/docs/downloaddoc.aspx/?d id=35987557&pt=16&ft=11						
	Teach Back" technique & resources provided to patient	Check if	This item's effectiveness** for this patient (check box)				Notes	
	provided to patient	used	Very High	High	Low	Very low		
Т	each back technique							
М	edicine List							
7	day × 4 times/day pill bo×							
Р	astic medicines carrier							
V	/arfarin Question/Answer Sheet							
١N	IR Chart (copy for home & clinic)							
Р	atient Contract:							
Υ	our Guide to warfarin therapy (Eng/Span)							
	High effectiveness= this tool was appro Low effectiveness = this tool was poorling His checklist is adapted from Managing Oral A.	/ suited, i	not hel	pful ar	nd not	well ú	tilized by patient.	
Ŕ	.10:23-25 (Ansell, Oertel & Wittkowsky, 2005)	ocuga/at	IG1 7116	гаруг. О	ai rout	and Op	orationar Januarrico, 2 Zuniari,	

Patient Educa	ation C	heck	clist				
Patient Education Ask the patient to answer ("teach the patient's <u>first visit</u> to the clinic	back") from 4 to 5 , add a ① below th	5 questions ne date of ir	struction. If	Significant	Other is pre	esent, add "	
elow the date of instruction. Try Assign a score from be			-				
1 = Patient understands	orcement				N/A = Not applicable		
	of Instruction: sit or SO present:						
Question for Patient / Expected Behavioral Outcome	Score:						
Tell me why you are taking w State reason for taking warfa							
Tell me what warfarin does to State how warfarin affects th	*						
Tell me how you take your me the dose? Pill color? How an take it? State the dose, pill color, how to be taken	d when do you						
Show me how you use your p Describe how to use the seve							

Joint Commission Tracers

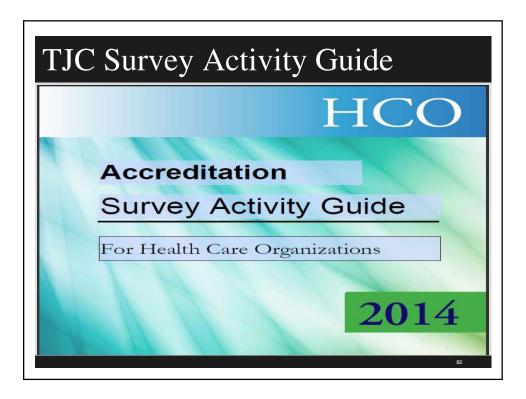
What Hospitals Need to Know about the Dietary Tracer





Discharge Planning Tracer

- TJC has a discharge planning-active review tracer
- Will ask for a list of patients to be discharged
- Will review their discharge order
- During the discharge planning process surveyor is to interview the patient
- Interview to make sure the patient's understanding in the changes in diet and dietary restrictions or supplements
- Will ask same in the retrospective review when calling patients at home discharged in past 48 hours



Dietetic and Food Services Tracer

- Objective is to assess and determine compliance with standards and EPs related to nutrition care
- Objective to increase awareness of risk in nutrition care practices and food service operations
- Tracer begins where patient is located
- Surveyor to look for specific diet order from doctor
- Will ask what national standard the hospital is using for recommended dietary allowances
- Will look at infection control issues such observe hand hygiene, hygiene practices and kitchen sanitation

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Dietetic and Food Services Tracer

- Will discuss the following;
 - Safe practices for handling food
 - Is the hot food hot enough, is the cold food the correct temperature, how do you clean the thermometers used to check the food, wipe off can lid, clean can opener, etc
- Assessment process to determine patient dietary needs
- Process for prescribing and evaluating therapeutic diet orders
- Process for accommodating special and altered diet schedules

Dietetic and Food Services Tracer Discuss

- Follow-up process when the patient refuses food served
 - Nurse contacts dietician or offers patient other courses allowed by their current diet order
- Qualifications of dietitian and dietary services director (new in 2014)
 - During competence assessment surveyor is instructed to review the personnel file of the director of dietary services
 - To verify there is a full time director
- Verify availability of a current therapeutic dietary manual for reference (2014)

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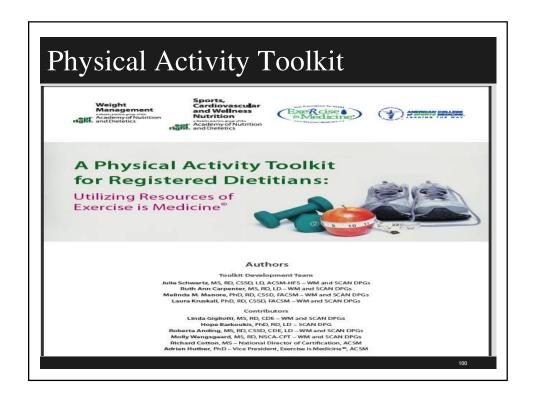
Things Looked at in the Past

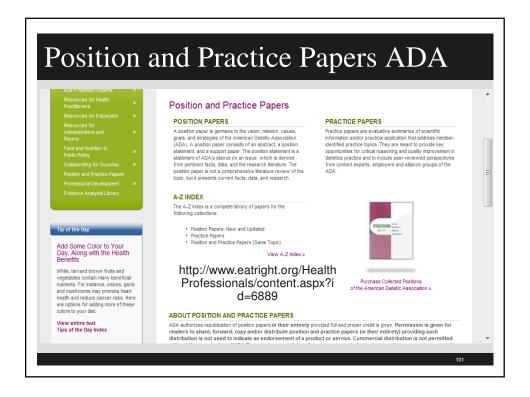
- There are a number of things that surveyor have also looked at in the past both from CMS and TJC
- Will look for nutrition screening and dietician assessment
- Look for evidence that dietician written recommendations are being followed
 - If physician orders consult with dietician
 - Be sure hospital P&P allows dieticians to accept verbal orders (see position paper)
 - See additional slides at the end for additional things that the surveyors have looked at in the past





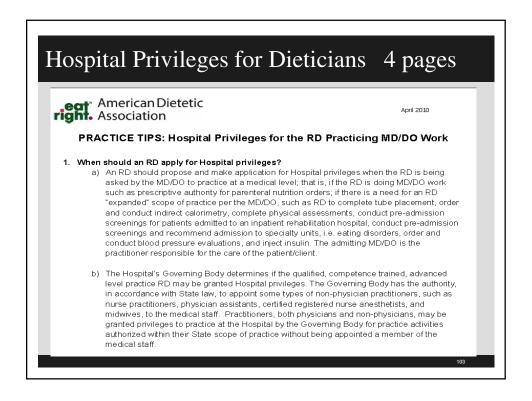




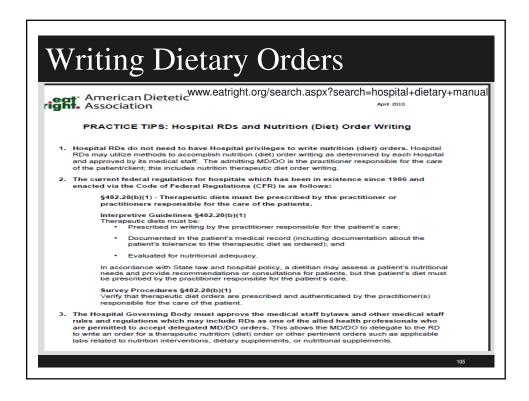


Academy of Nutrition and Dietetics

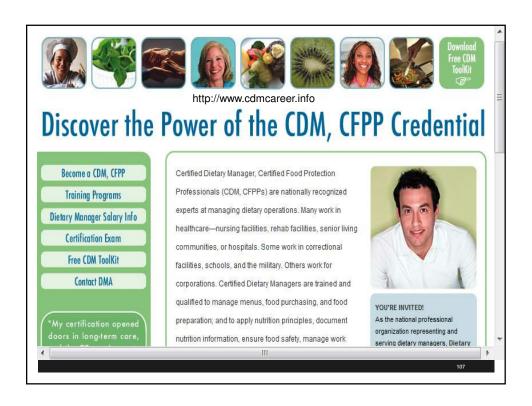
- Some of the things on their website:
- Nutrition care manual with 100 diseases and conditions
- Pediatric nutrition care manual
- Sports nutrition care manual
- Practice papers
- RD and hospital privileges
- Evidence analysis library
- Evidenced based practice guidelines



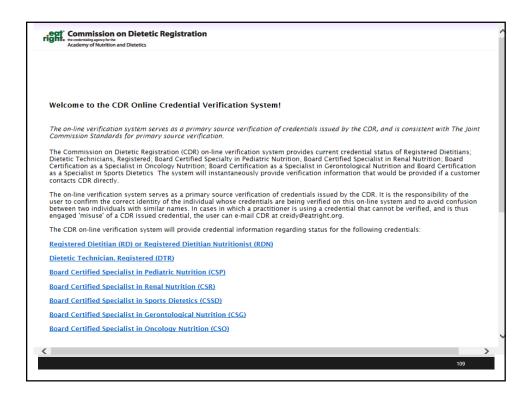






















California Hospitals

- California has Title 22 standards and surveyors are known to be very detailed
- Things they have looked at:
 - Pull apart every piece of lettuce to wash it
 - Review disaster manual and inventory and make sure patient has enough water every day
 - if 1500 calorie ADA diet would calculate out every calorie, fat, carb, etc.
 - Looked at each piece of cheese from the vendor to see protein content and problem if vendor changes products
 - Wanted to see dates on containers in refrigerator
 - Wanted purpose, intent, principles of each diet in diet manual, and meal patterns

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CDPH Memo May 24, 2013

- Ca Dept of Public Health issues memo based on their state law and federal law
 - Two pages and addresses diet manual, orders, menu planning and disaster menu planning
- Diet manual needs to include the purpose and principles of each diet, the meal pattern
- Diet manual and diets ordered by the physician should mirror nutritional care by the facility
- To make sure meeting nutritional needs of patients in accordance with Recommended Dietary Allowances (RDA)





California Department of Public Health



www.cdph.ca.gov/certlic/facilities/Documents/LN

AFL 13-11

May 24, 2013

All Health Care Facilities

SUBJECT:

Diet Manuals, Orders, and Menus Must Meet Patient's Nutritional Needs and Disaster Menu Planning

AUTHORITY:

Title 22 California Code of Regulations (CCR) Sections 70273(a) and (d), 70741(b), 71243(a) and (d), 71539(b), 72335(a), 73237, 72551(b), 73325(a), 73329, 7349(b), 76363(a), 76367, 76563(b), 76882(a), 76884, 76928(b), 79685(a) and (i) Title 42 Code of Federal Regulations (CFR) Sections 482.28, 482.41(a), 483.35, 483.75(m)

This All Facility Letter (AFL) is being issued to remind facilities that the nutritional needs of patients/residents/clients must be met through menu development in accordance with the physician's diet orders, as delineated in the facility diet manual. In addition to menu planning, the AFL will clarify the intent of disaster menu planning.

Diet manuals establish a common language and practice for physicians and other health care professionals to use when providing nutrition care to patients, residents, and/or clients. The diet manual includes the purpose and principles of each diet, the meal pattern, the foods allowed and not allowed, and the nutritional adequacy and inadequacy of each diet. The facility's diet manual and the diets ordered by the physician should mirror the nutritional care provided by the facility. All diets ordered the physician must be reflective of the facility's diet manual.

The analysis of the menu is the foundation of meal planning to assure that the nutritional needs of the patient/resident/client are in accordance with the physician order and the Recommended Dietary Allowances (RDAs). The Dietary Reference Intakes (DRIs) are the most recent set of dietary recommendations established by the Food and Nutrition Board of the Institute of Medicine. The DRIs encompass the RDAs and

For menus and diets that do not meet the DRIs, facilities must have an established system that addresses any nutritional inadequacies of the diet. Although the RDA or Al may serve as the basis for such guidance, qualified medical and nutritional personnel should make adaptations for specific situations.

In addition, state regulations require facilities to have detailed written plans and procedures to meet all potential emergencies and disasters. These written procedures should include plans for the availability of adequate basic utilities and supplies, including food and water, with consideration for the special needs of the patients/residents/clients treated at the facilities.

Special needs can be attributed to age (e.g. pediatrics), therapeutic diet (e.g. renal, diabetic), or mechanically altered diets (e.g. mechanically chopped, puree) (CCR Sections 70741(b), 71539(b), 72551(b), 73549(b), 76563(b), 76928(b) and CFR Sections 482.41(a), 483.75(m)). All foods should be evaluated for appropriateness for service to all, including those on prescribed therapeutic and/or mechanically altered diets. Nutritional adequacy related to carbohydrate, fat and biological value protein content is to be evaluated.

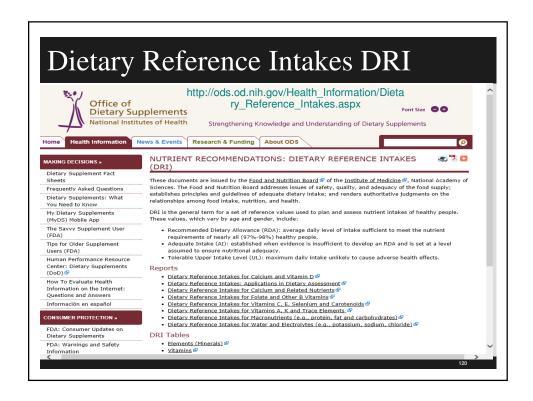
Facilities should develop disaster menu plans that can be mobilized in the event of the lack of essential utilities (e.g. gas, electricity, water), that can be easily served by disaster response personnel, and that mirror the nutritional adequacy of the meals routinely served at the facilities.

Facilities are responsible for following all applicable laws. The California Department of Public Health's failure to expressly notify facilities of statutory or regulatory requirements does not relieve facilities of their responsibility for following all state and federal laws and regulations. Facilities should refer to the full text of all applicable regulatory sections.

If you have any questions, please contact your respective Licensing and Certification District Office.

CDPH Memo

- Dietary Reference Intake (DRIs) are most recent set of dietary recommendations established by the Food and Nutrition Board of the Institute of Medicine
- DRIs encompass the FDAs and Adequate Intakes (Als) as the national standard of practice for menu and nutrient analysis
- Nutritional adequacy related to carbs, fat, and protein content is to be evaluated
- Need to develop disaster menu planning under state law



The End! Questions???



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- President of Patient Safety and Education Consulting
- Board Member Emergency Medicine Patient Safety Foundation at www.empsf.org
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- sdill1@columbus.rr.com



Surveyor Has Observed in the Past

- Meal being served to patients; patient receives assistance with eating, when needed; staff monitoring patient food consumption
- Staff practices relative to food safety such as monitoring food temperatures, transportation practices, potential food borne infections, etc.
- Kitchen and food preparation areas focusing on sanitation, maintenance, and safety
- Food preparation (recipes, special diet preparation, food nutrient retention considered in preparing) and serving (portion size served, system staff follows to serve correct diet)
- Therapeutic diet meal preparation process (e.g., fat free, low salt, restricted/increased calorie count) or mechanical preparation (e.g., pureed, thickened)

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Topics Dietary Tracer

- Assessment, care planning and instruction by qualified staff
- Identification of nutrition risk
- Nutrition screening criteria (CMS has also)
- Timeframes for nutrition assessment and reevaluation of nutritional risk
- Measuring food consumption such as methods for doing, responsible staff, use of the data

Topics Dietary Tracer

- Specific population needs, such as patients that are NPO, receiving hyperalimentation, on vents, in isolation, suffering from burns
- Process for obtaining meals for patients after food service hours
- Procedures followed for patients refusing meals
- Consultations and referrals
- See PC.02.02.03, HR.01.04.01, HR.01.05.03

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Topics Dietary Tracer

- Nutritional adequacy of patient diets
- Discharge education plans and referrals
- Dietetic service staff training (departmental and interdepartmental)
- Communication between dietitians and food service if not considered the same department
- Dietitians included and participating in care planning process

Topics Dietary Tracer

- Surveyor will speak with dietary director about day to day operations including
- Qualifications of dietary director
- Responsibilities of dietary and food services leadership and management
- Involvement with others for P&Ps (MS, Nursing)
- Scheduling of food
- Safe food handling and health of dietary staff

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Topics Dietary Tracer

- Contracts for services, food, and nutrition services
- Emergency disaster planning for patients and staff
- Hospital diets and menus (selective or nonselective, nourishment choices, foods common to community)
- Sanitation and infection control (pest control, chemicals)
- PI activities, PI process, standards of practice being followed and food preparation and storage procedures

Food and Dietetic Services Tracer

- Maintenance of space and equipment
- Process for prescribing and evaluating therapeutic diet orders
- Processes for accommodating special and altered diet schedules
- Surveyor is to explore the role of dietary in the evaluation of medication

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Surveyor to Discuss in Past

- Process for accommodating special and altered diet schedules
- Follow-up process when the patient refuses food served
- Qualifications of dietitian and dietary services director
- And verify availability of a current therapeutic diet manual for reference
- Will also observe for hand hygiene

Tracing Patients through Dietetic Service and Food Service Applies to: Hospital Accreditation Program

Surveyor Tips & Tools

Incomorate review of these services into patient tracer activity. Use this guide and the data collection tool to help you perform a thorough review of these services and cover the topics addressed in the standards.

Patient Tracer Selection

When selecting patients to trace consider including a sample

- with special nutrition needs who need assistance with eating
- needing specially prepared meals

Organization Suggested individuals to speak with during patient tracer activity

- Organizational manager for
- dietetic service department Organizational manager for staff development
- Foodservice manager
- Clinical nutrition care manager
- Staff representatives for maintenance and environmental services
- Staff representative for

Objectives

Assess and determine the degree of compliance with standards and elements of performance relating to nutrition care

This is not intended to be a stand-alone service tracer.

Increase organization's awareness of any identified risks in nutrition care practices and food service operations

- Patient tracer activity begins in the area where the patient is currently located; review the patients record for

 - Physician orders for specific diets Nutrition screening and dietitian assessments Evidence of written orders demonstrating that dietitian recommendations are being followed
- The surveyor(s) will follow referrals pertaining to clinical nutrition care for patient(s)
- The surveyor(s) will move to other settings as appropriate and applicable to tracing any safety, sanitation and therapeutic issues related to the storage, preparation, service and distribution of food
- The surveyor(s) will observe dietetic service staff and engage them in discussion focused on the quality and consistency of service which has been observed and as it relates to the patient(s) being traced

Observation

Key aspects of this care and service that should be observed include:

Meal being served to patients; patient receives assistance with eating, when needed: staff monitoring natient food.

- Staff representatives for maintenance and environmental services
- Staff representative for infection control/surveillance

Documentation

- Review most recent local health department kitchen inspection report
- Review any contracts related to food and nutrition services
- Review HR file for food service director/manager
- Training records for food service staff

Other Resources*

Clinical - American Dietetic Association (www.eatright.org)

Food handling and sanitation -Food and Drug Administration (FDA) Food Code, published every two years (www.fda.gov)

Observation

Key aspects of this care and service that should be observed include:

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Topics to Discuss Throughout Patient Tracer Activity

Surveyors should cover the following topics with participants as they trace patients' clinical nutrition needs:

- Assessment, care planning and instruction by qualified staff
- Identification of nutrition risk
- Nutrition screening criteria
- Timeframes for nutrition assessment and re-evaluation of nutritional risk
- Measuring food consumption (methods for doing, responsible staff, use of the data)