



THE VOHRA COMPREHENSIVE WOUND CARE PARTNERSHIP PROGRAM

PLAN OF CORRECTION AND PREVENTION OF SKILLED NURSING FACILITY DEFICIENCIES

CJ Leonard, DO

CIO

Vohra Wound Physicians

SURVEYS, DEFICIENCIES AND F-TAGS

- The Department of Health and Human Services is responsible for the comprehensive inspecting and reporting of identified deficiencies within long-term care facilities (this is a requirement for Medicare and Medicaid funding)
- A statement of deficiency document uses a federal tag numbering system that addresses the degree to which a facility meets minimal federal standards
- F-tags correspond to specific stipulations within the Code of Federal Regulations
- Facilities that receive F-tags are required to display them in a public location within the facility and reported on federal websites and databases

**F-TAG 314 IS RELATED TO WOUND CARE
WHAT IS F-TAG 314?**

F 314 483.25 (c) - Pressure Sores (Ulcers)¹

Based on the comprehensive assessment of a resident, the facility must ensure that;

A resident who enters the facility without pressure sores does not develop pressure sores unless the individual's clinical condition demonstrates that they were unavoidable

AND

A resident who has a pressure ulcer receives care and services to promote healing and prevent additional ulcers



Refer all wound patients to your Vohra wound physician early for prevention

WHAT OTHER F-TAGS ARE RELEVANT TO WOUND CARE?

F-TAG 157

A physician must be notified of any changes to wound health

Your Vohra wound care physician is always available to your WCN

Current initiatives increase availability for higher acuity patients and admits

Standardized referral program addresses any changes or newly developed wounds immediately

WHAT OTHER F-TAGS ARE RELEVANT TO WOUND CARE?

F-TAG 28 I

Correct wound dressings must be used on different wound types

Vohra wound physicians are highly trained specialists with an extensive LTC wound dressing database

Unmatched clinical and industry knowledge and experience

Proven superior outcomes at low cost

Education on our facility portal specific to the dressings we have chosen, giving the WCN further insight and on-the-job, continuous learning

WHAT OTHER F-TAGS ARE RELEVANT TO WOUND CARE?

F-TAG 385

Adequate physician supervision must be provided for SNF wound

Your Vohra wound physician rounds weekly and will see all your wound and skin referrals

Standardized wound care program so all wounds are superbly cared for with robust documentation to reduce legal risk associated with arbitrary referral criteria

Vohra clinicians base frequency of visits on clinically-determined medical necessity and with intelligent resource utilization

WHAT OTHER F-TAGS ARE RELEVANT TO WOUND CARE?

F-TAG 501

The medical director must be involved in the wound care program

Your Vohra wound physician will communicate often and effectively with the entire facility team

Vohra clinicians are highly engaged in the SNF's care delivery team and system

F-TAGS ALSO HAVE A “SCOPE”

Nursing Home Pro's Scope & Severity Grid	SCOPE		
SEVERITY	Column 1 - <u>Isolated</u>	Column 2 - <u>Pattern</u>	Column 3 - <u>Widespread</u>
Immediate jeopardy to resident health or safety	J	K	L
Actual harm that is not immediate jeopardy	G	H	I
No actual harm with potential for more than minimal harm that is not immediate jeopardy	D	E	F
No actual harm with potential for minimal negative impact	A	B	C

2

- The scope of an F-Tag is determined by the surveyor when reviewing the medical record
- Scope and severity play a role in the determination of deficiencies

"UNAVOIDABILITY" OF WOUNDS

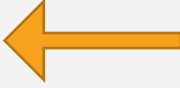
Facilities should endure that policies and procedures are consistent with current standards of practice

To demonstrate compliance for residents with pressure ulcers, the facility must show the pressure ulcer was **unavoidable** by documenting **all of the following actions:**

- **Evaluate the resident's clinical condition and pressure ulcer factors**
- **Define and implement interventions that are consistent with resident needs, goals and recognized standards of practice**
- **Monitor and evaluate the impact of interventions**
- **Revise the approaches as appropriate**

The intent of **F-Tag 314** is that the facility provides care and services to promote the prevention of all types of wounds, promote the healing of all types of wounds (including infection) and **prevent** additional wounds from occurring¹

Required demonstration of **"unavoidability"** supported and bolstered by the actions and strength of the your Vohra wound physician's documentation and by the full implementation of the **Vohra Wound Care Program**

A yellow arrow pointing from the right side of the text towards the "following actions" list.

UTILIZE THE ROBUST VOHRA WOUND CARE PROGRAM

Research by the Centers for Medicare/Medicaid Services (CMS) and the Office of the Inspector general (OIG) supports the direct link between continuing education and the quality of care, and staff retention.³ Surveyors will interview nursing assistants to determine whether they know what, when and to whom to report changes in skin condition.¹

- **WE ARE COMPLETELY ALIGNED WITH THE MISSION OF THE VERY REGULATORY AGENCIES THAT GOVERN THE SNF**
- **On-demand access to wound and skin care education**
- **Vohra Center of Excellence Program**
- **Vohra Wound Care Certification Program**
- **Get your Vohra wound care physician onboard with your wound patients early**

THE VOHRA COMPREHENSIVE WOUND CARE PARTNERSHIP PROGRAM

PLAN OF CORRECTION AND PREVENTION OF SKILLED NURSING FACILITY DEFICIENCIES

1. CMS Manual System, Pub. 100-07 State Operations Provider Certification, appendix PP, F-Tag 314 Current Guidance to Surveyors.

2. Nursing Home Pro (December, 2009). Scope and Severity – How Nursing Homes are Really Graded. Retrieved from <http://www.nursinghomepro.com/33/scope-severity-how-nursing-homes-are-really-graded/>