

5-13-24 Weekly Clinical Update

Based on recent surveys, it is time to discuss required training and in-services. Surveyors are not only adding up the required 12 hours for CNAs, but they are also reviewing content of the training to ensure the intent of the regulatory requirements of trainings and in-service are being followed. And they are looking at documentation processes for completion of the exact times of each in-service along with sign-in sheets.

F940 Training Requirements says: A facility must develop, implement, and maintain an effective training program for all new and existing staff; individuals providing services under a contractual arrangement; and volunteers, consistent with their expected roles. A facility must determine the amount and types of training necessary based on a facility assessment as specified at § 483.70(e).

F941 Communication Training says: A facility must include effective communications as mandatory training for direct care staff.

F942 Resident Rights and Facility Responsibilities Training says: A facility must ensure that staff members are educated on the rights of the resident and the responsibilities of a facility to properly care for its residents as set forth at §483.10, respectively.

F943 Abuse/Neglect/Exploitation Training says: In addition to the freedom from abuse, neglect, and exploitation requirements in § 483.12, facilities must also provide training to their staff that at a minimum educates staff on—

§483.95(c)(1) Activities that constitute abuse, neglect, exploitation, and misappropriation of resident property as set forth at § 483.12.

§483.95(c)(2) Procedures for reporting incidents of abuse, neglect, exploitation, or the misappropriation of resident property.

§483.95(c)(3) Dementia management and resident abuse prevention.

F944 QAPI Training says: A facility must include as part of its QAPI program mandatory training that outlines and informs staff of the elements and goals of the facility's QAPI program as set forth at § 483.75.

F945 says: Infection Control Training says: A facility must include as part of its infection prevention and control program mandatory training that includes the written standards, policies, and procedures for the program as described at §483.80(a)(2).

F946 Compliance and Ethics Training says: The operating organization for each facility must include as part of its compliance and ethics program, as set forth at §483.85—

§483.95(f)(1) An effective way to communicate the program's standards, policies, and procedures through a training program or in another practical manner which explains the requirements under the program.

§483.95(f)(2) Annual training if the operating organization operates five or more facilities.

F947 Required In-Service Training for Nurse Aides says: Training topics must include but are not limited to—

§483.95(g) Required in-service training for nurse aides. In-service training must—

§483.95(g)(1) Be sufficient to ensure the continuing competence of nurse aides, but must be no less than 12 hours per year.

§483.95(g)(2) Include dementia management training and resident abuse prevention training.

§483.95(g)(3) Address areas of weakness as determined in nurse aides' performance reviews and facility assessment at §483.70(e) and may address the special needs of residents as determined by the facility staff.

§483.95(g)(4) For nurse aides providing services to individuals with cognitive impairments, also address the care of the cognitively impaired.

F949 Behavioral Health Training says: A facility must provide behavioral health training consistent with the requirements at §483.40 and as determined by the facility assessment at §483.70(e).

§483.95 Training Requirements.

Training topics must include but are not limited to—

§483.95(i) Behavioral health.

A facility must provide behavioral health training consistent with the requirements at §483.40 and as determined by the facility assessment at §483.70(e).

Some examples of recent survey findings include:

F941 Communication Training

SS=E: Failed to ensure agency nurse, LN had required effective communication education placing residents at risk for impaired communication with LN

- *Grievance documented resident's family stated felt resident not being cared for appropriately & when family arrived resident in bed with brief on, no incontinence pad & brown stain on sheet; facility asked staff to change resident & staff stated they were giving a bed bath; family requested again & staff stated resident had to wait until help came; LN came to resident's room, pulled the privacy curtain & stated loudly & rudely that staff were "done" with resident's family; upon request facility unable to provide documentation that LN completed education on effective communication before started working at facility; Adm nurse stated facility made sure agency nurses had license before started working at facility but did not look at education documentation; failed to ensure LN had required effective communication education placing residents at risk for impaired communication with LN*

SS=F: Failed to ensure direct care staff received required communication training placing residents at risk for impaired care & decreased quality of life

- Review of facility's training for 3 CNAs & 3 LNs revealed lacked of training for communication; failed to ensure completion of required communication training for staff who provided care in facility placing residents at risk for impaired care & decreased quality of life

F942 Resident Rights Training

SS=E: Failed to ensure agency nurse, LN had required Resident Rights education placing residents at risk for impaired resident rights

- *Cited findings noted in F941; failed to ensure LN had required resident rights education placing residents at risk for impaired resident rights*

SS=F: Failed to ensure all staff were educated on Resident Rights & facility's responsibilities to provide proper care placing residents at risk for impaired care & decreased quality of life

- Review of facility's training for 3 CNAs & 3 LNs revealed lacked of training for Resident Rights; failed to ensure completion of required Resident Right training for staff who provided care in facility placing residents at risk for impaired care & decreased quality of life

F943 Abuse, Neglect, & Exploitation Training

SS=F: Failed to provide evidence of required prevention of abuse, neglect & exploitation training for 2/5 CNAs that were sampled

- Employee records revealed facility failed to provide evidence that 2 CNAs received required ANE training; Training records lacked duration or tracked time period for education provided; documentation lacked any clear way that demonstrated education hours & topics were tracked; failed to provide evidence of required prevention of ANE training for 2/5 CNAs that were sampled

F947 Required In-Service Training for Nurse Aides

SS=F: Failed to ensure 1/5 CNA staff reviewed had required 12 hours of in-service education placing residents at risk for inadequate care

- Review of in-service records revealed PRN CNA hired 6-7-23 had 3.5 hours of in-service education in past 12 months; failed to ensure 1/5 CNA staff reviewed had required 12 hours of in-service education placing residents at risk for inadequate care

SS=F: Failed to ensure 5/5 CNA staff reviewed had required 12 hours of in-service education & 2/5 CNA staff had required in-service for dementia care placing residents at risk for inadequate care

- CNA with 8 hours of in-service in past 12 months
- CNA with 6 hours of in-service in past 12 months
- 2 CNAs with 0 hours of in-service & record lacked evidence of required education on topic of dementia in past 12 months
- CNA with 6 hours of in-service in past 12 months
- Binders with in-service documentation provided to surveyors; binders contained various education topics with sign-in sheets & **majority of topics lacked duration or tracked time period for education provided; binders lacked any clear way that demonstrated education hours & topics tracked;** failed to ensure 5/5 CNA staff reviewed had required 12 hours of in-service education & 2/5 CNA staff had required in-service education for care placing residents at risk for inadequate care

SS=F: Failed to ensure 1/5 CNAs employed at facility for at least 1 year completed minimum 12 hours of in-service training per year & lacked system for accurately tracking CNA education

- CNA training records for 1 CNA who had been employed at facility for over 1 year revealed lack of 12 hour in-service training for CNA & had completed 4.5 hours; Adm nurse stated facility had not monitored completion of CNA in-service hours & verified that 1/5 CNA's lacked 12 hours of yearly in-service training; failed to ensure 1/5 CNA staff reviewed completed minimum 12 hours of in-service training per year & lacked system for accurately tracking CNA education

F947 Required In-Service Training for Nurse Aides

SS=F: Failed to ensure 5/5 CNA staff reviewed had required 12 hours of in-service education including required topics per year placing residents at risk for inadequate care

- 5 CNA w/o evidence of in-service/education hours in past 12 months; Adm nurse stated facility provided education for staff but facility did not have a way to track hours of education provided for year; failed to ensure 5/5 CNA staff reviewed had required 12 hours of in-service including required topics per year placing residents at risk for inadequate care

SS=Failed to ensure 3/3 CNA staff reviewed had required 12 hours of in-service education which included required dementia management training placing residents at risk for inadequate care

- 3 CNA personnel files lacked evidence of dementia in-service training; "Elopement & Missing Resident's in-service training included 1 slide on dementia & progressive dementia but lacked direction for staff on interventions & methods of approach for residents with dementia; "Communication" in-service training included "Ten Tips for Improving Communication with a Resident with Dementia" but lacked direction on providing care to residents with dementia & how to ID & implement interventions to promote quality of life for residents with dementia; failed to ensure 3 CNA staff reviewed had dementia management training part of required 12 hours of in-service education placing residents at risk for inadequate care

So, in summary, trainings and in-services are receiving MUCH more attention than previous. And those trainings must add up to the required hours.

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CNAs must be trained at least annually on:

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Abuse, Neglect, Exploitation

Advance Directives

Behavioral Health including Substance Use Disorder

QAPI

Compliance & Ethics

Dementia Care

Communication

Missing Residents and Elopements

Emergency Preparedness

HIPAA & Confidentiality

Infection Prevention & Control

Resident Rights & Facility Responsibilities

Safety in the Workplace