Oregon Health Authority
Readiness for Surveys, POCs and Revisits

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Nurse Staffing Survey Readiness

- Surveys focused on several key areas:
  - Nurse staffing postings and record keeping;
  - Nurse staffing committee operations;
  - Nurse staffing plan requirements and annual plan review; and
  - Nursing staff member meals, breaks and OT

- Sample needs list is online and initial needs list is mailed with survey notice
Nurse Staffing Survey Readiness

• Nurse Staffing Postings and Record Keeping
  – Posting: Complaint Notice
    • Summarizes ORS 441.152 – 441.177
    • Clearly visible to the public
    • Includes OHA’s phone, email and [www.healthoregon.org/nursestaffing](http://www.healthoregon.org/nursestaffing)
  – Posting: Anti-retaliation Notice
    • Summarizes ORS 441.181, 441.183 and 441.192
    • Posted where notices to employees and employment applicants are customarily displayed
  – Record Keeping – documents that demonstrate compliance with nurse staffing rules
Nurse Staffing Survey Readiness

• Nurse Staffing Committee Operations
  – Quarterly meetings
  – Composition of committees
    • Equal numbers
    • Selection of members
    • Selection of Co-chairs
    • Non-RN direct care member
Nurse Staffing Survey Readiness

• Nurse Staffing Committee Operations
  – Charter clearly describes:
    • Scheduling
    • Meeting notices
    • Agendas
    • Process for input from staff
    • Decision-making participation & processes
    • Monitoring, evaluating and modifying plan(s) over time
  – Minutes include:
    • Name & position of members & observers in attendance
    • Motions made & outcomes of votes
    • Discussion summaries
    • Exclusions
Nurse Staffing Survey Readiness

• Nurse staffing plan requirements
  – Specialized qualifications & competencies to provide necessary skill mix
  – Measurement of unit activity including ADT
  – Total diagnoses & nursing staff required to manage that set of diagnoses
  – Consistent with nationally recognized standards & guidelines
  – Patient acuity & nursing care intensity
  – Minimum nurse staffing numbers for specified shifts & no less than 1:1
  – Formal process for initiating limits on admissions & diversions
  – Consider tasks not related to direct care including breaks
  – Not based solely on external benchmarking data
Nurse Staffing Survey Readiness

- Nurse staffing plan annual review considers
  - Patient outcomes
  - Complaints about staffing including delays or absence of nursing care
  - Number of hours of care provided compared with number of patients served during a 24-hour period
  - Aggregate mandatory overtime & aggregate voluntary overtime worked by nursing staff
Nurse Staffing Survey Readiness

• Nurse staffing plan annual review considers
  – Percentage of shifts for which nurse staffing differed from written plan requirements
  – Any other factors necessary to ensure hospital meets patient health care needs
  – Any report filed by nursing staff indicating pattern of required overtime for nonemergency care

• After review HNSC issues written report to hospital and modifies plan as needed
Nurse Staffing Survey Readiness

• Nursing staff member overtime
  – Document MOT vs VOT
  – Document voluntary pick-ups
  – MOT policy
Nurse Staffing POC Readiness

• The POC guidance document
  – Lists what needs to be included in POC
  – Sent with every nurse staffing survey report and complaint investigation report
  – Also available on www.healthoregon.org/nursestaffing

• The POC guidance document includes a sample nurse staffing report deficiency tag to illustrate the rule, deficient practice statement and findings section of the report
Nurse Staffing POC Readiness

- Plans are reviewed for sufficiency of:
  - The plan & procedure to correct the deficiency;
  - The monitoring to ensure that the deficiency has been abated; and
  - The title of the person responsible for implementing the corrective action.

- OHA offers conference calls to review specific areas of confusion or concern with hospitals drafting Plans of Correction. Contact mailbox.nursestaffing@state.or.us to set up a conference call for your team.
Nurse Staffing POC Readiness

• When drafting a plan, consider the following:
  – Frequency of Monitoring = Annual monitoring is not frequent enough to demonstrate sustainable correction
  – Person Responsible = one or two people
  – Attachments are not reviewed at the time of POC review. Those documents may be requested and reviewed as applicable during the revisit (example: HNSC charter)
  – If a POC references a template describe how the template meets the standard
  – Repetition and references to other tags
  – Formatting
    • Name of hospital
    • Revised POCs – changes to accepted tags and submitted the full POC
Nurse Staffing POC Readiness

• The hospital may involve the nurse staffing committee to assist in finding and implementing solutions to the cited deficiencies

• POC should not:
  – Attempt to disprove the findings;
  – Disagree with the findings or deficiency without including a plan to correct the deficiency;
  – Propose a correction to a specific finding without address the deficient practice statement; or
  – Restate the statute or administrative rule as the proposed correction
Nurse Staffing Revisit Readiness

• Revisits focus on specific findings of non-compliance in unit(s) previously surveyed

• Process
  – Usually desk audits
  – Begins with a document request, followed by a second document request

• Revisit Resources
  – Sample Revisit Letter
  – New questions in Nurse Staffing Interpretive Guidance
  – Existing resources:
    • Survey Tools
    • Interpretive Guidance
Nurse Staffing Resources

- Available on [www.healthoregon.org/nursestaffing](http://www.healthoregon.org/nursestaffing):
  - Archived Open House Events
    - May 17, 2016 – SB 469
    - August 25, 2016 – Administrative Rules
    - January 18, 2017 – Survey Tools
    - June 8, 2018 – Plans of Correction
  - Sample Nurse Staffing Survey Tool Kit
  - Interpretive Guidance
  - Nurse staffing survey reports and approved POCs
Nurse Staffing Information

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