



# CITATION TRENDS IN APPENDIX Z AND HOW TO AVOID THEM

***Presenter:***

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# LEARNING OBJECTIVES:

Identify and interpret key citation trends within CMS Appendix Z, highlighting significant changes and patterns over recent reporting periods.

Analyze how these citation trends affect healthcare compliance and reimbursement processes, assessing the implications for facility performance and regulatory outcomes.



# CMS & APPENDIX Z

- Emergency preparedness requirements for Medicare and Medicaid participating providers
- Comprehensive emergency preparedness program requirements
- Guides inspection process
- Nursing Home
  - Federal requirement
  - E-Tags
  - Impacts ratings and reimbursement
- Assisted Living
  - 144G Requirement
  - 0680

# KEY TRENDS IN APPENDIX Z CITATIONS



KEY TRENDS EXTREMELY SIMILAR  
FOR NURSING HOMES AND  
ASSISTED LIVING



HIGHLIGHT AREAS WITH PERSISTENT  
COMPLIANCE ISSUES



PROACTIVE STRATEGIES FOR  
QUALITY IMPROVEMENT AND RISK  
MANAGEMENT

# CITATION REPORTS AND DETAIL

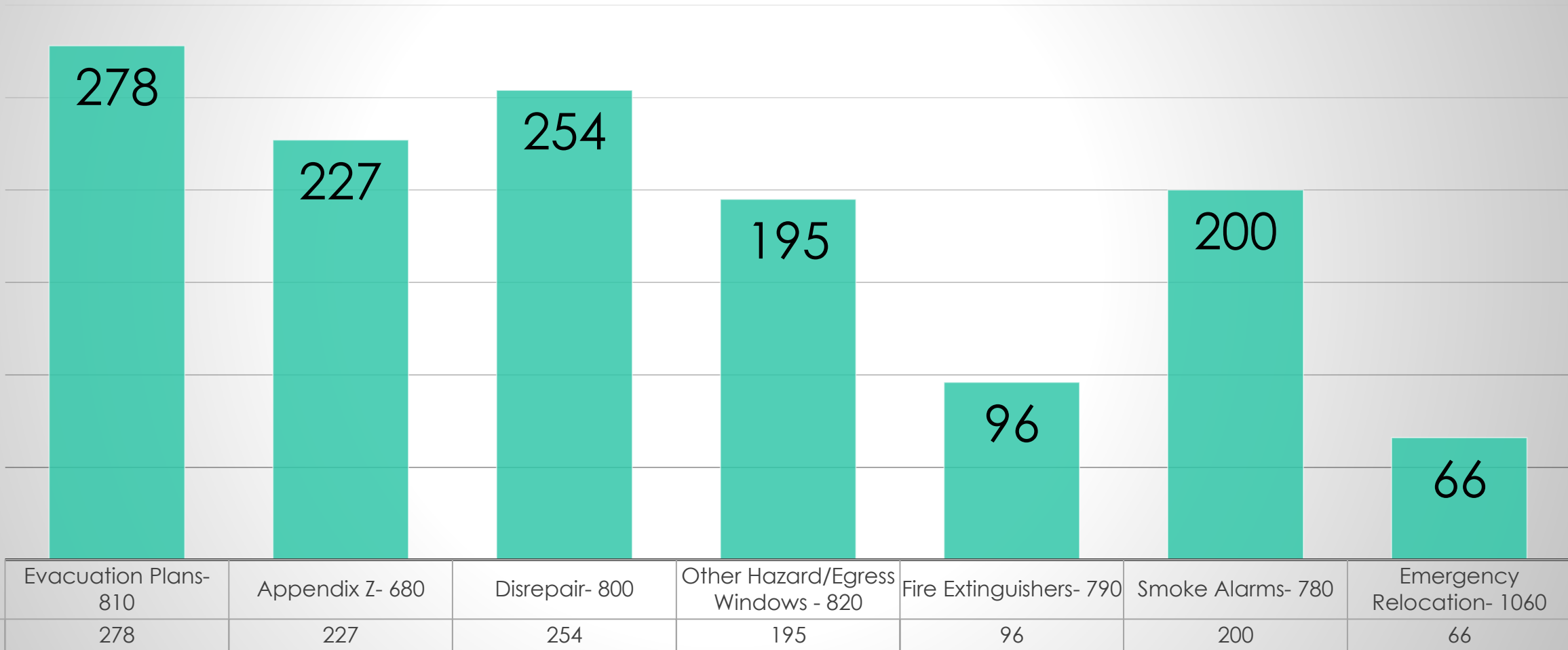
## Nursing Home

- Statement of Deficiencies (2567)
- E-Tags

## Assisted Living

- Statement of Deficiencies (SOD)
- 0680 – and others

## Emergency Preparedness & Physical Environment Citations CY Q3, 2024



# FOCUS AREAS

**Communicating  
Evacuation Plan**

**EP & Testing**

**Subsistence  
Needs**

**Facility  
Assessment  
(NH)**

**ER Standby  
Power Systems  
(NH)**

**Written  
Arrangements**

**Facility Specific  
P&P (AL)**

**Self-Evacuation**

# FACILITY SPECIFIC EVACUATION PLAN



THIRD-PARTY VENDOR  
POLICIES AND PROCEDURES



ACRONYMS (RACE, PASS)



ACCESSIBLE, ACCURATE  
EVACUATION PLANS



# ACRONYMS

<b>Procedure</b>	1. CALL 9-1-1. <b>Do not use the elevator in case of fire – use the stairs if necessary.</b>	
	2. R.A.C.E: In the event of a fire, staff should follow the <b>RACE</b> <u>process</u>	
3. Person in charge a. Get b. Ass c. Ass mor	<b>Procedure</b>	1. CALL 9-1-1. <b>Do not use the elevator in case of fire – use the stairs if necessary.</b>
4. Resident evacuation a. Dire b. Res ass c. Stal ove		2. R.A.C.E a. <b>RESUCUE</b> anyone in immediate danger if it is safe to do so. b. <b>ALERT</b> other staff members of the fire and location via the communication system. Pull the nearest fire alarm. c. <b>CONFINE</b> the fire. Close all doors and windows adjacent to the fire. Close all fire doors. Shut off fans, ventilators, and air conditioners if able as these will feed the fire and spread smoke throughout the building. d. <b>EXTINGUISH</b> the fire if it is small enough and it is safe to do so. Use PASS. i. P- Pull the pin ii. A – Aim at the base of the fire iii. S – Squeeze the handle to release the extinguishing agent iv. S – Sweep back and forth

- *Review policies for use of acronyms without explanation*
- *Discuss use of acronyms with those staff that are responsible for policy and procedure creation / updates*

# ACCESSIBLE, ACCURATE PLANS

**Accessible**

**Posted**

**Accurate**

**Cannot evacuate to the garage**



EMPLOYEE  
EDUCATION

Education separate  
from drills

Facility specific

2x/year

Execute one of the following

- Annual full-scale community-based exercise; **OR**
- Conduct facility based functional exercise; **OR**
- Actual emergency that requires plan activation

Execute and additional exercise. Use one of the following:

- Full-scale community-based exercise; **OR**
- Mock disaster drill; **OR**
- Table-top exercise

# EMERGENCY PLAN TESTING

2x / year



# COMMUNICATION PLAN

- Communicating plans with residents / others
- Collaboration and communication with state / local authorities



# RESIDENT & COMMUNITY SPECIFIC NEEDS

Subsistence needs

Evacuation ability assessment

- NH included in facility assessment
- Review of each resident and ability to self-evacuate



- Specific actions for those capable of evacuation
- Instructions to staff re: evacuation status
- Ways to move and evacuate residents based on building layout

# WRITTEN AGREEMENTS

Transportation : to ensure the continuity of services to residents in the event o limitations or cessation of operations.

Receiving sites: to ensure evacuation to a safe location

AND, LAST BUT NOT LEAST . . .



DOCUMENTATION OF ANNUAL  
INSPECTION AND MAINTENANCE  
OF EMERGENCY GENERATOR



QUARTERLY REVIEW OF MISSING  
RESIDENT POLICY



# QUESTIONS?





# THANK YOU!

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