



## **Abuse and Neglect Implementation Checklist (F604)**

On June 29, 2022, the Centers for Medicare & Medicaid Services (CMS) updated Appendix PP of the State Operations Manual. New and revised guidance covers significant sections of the Requirements of Participation and must be implemented by October 24, 2022.

LeadingAge has developed implementation checklists to assist members as they work toward compliance. The checklists and other resources are not exhaustive and LeadingAge strongly encourages members to review the CMS guidance to ensure compliance with all required elements.

Excerpts from the guidance and suggested action items are organized according to the headings provided by CMS in the State Operations Manual, Appendix PP. Excerpts are italicized, with new/revised guidance noted in red text.

### **483.12 Freedom from Abuse, Neglect, and Exploitation**

#### **F604 Right to be Free from Physical Restraints**

##### Guidance (p. 111)

New Guidance (in red):

*As described under Definitions, a physical restraint is any manual method, physical or mechanical device/equipment or material that limits a resident's freedom of movement and cannot be removed by the resident in the same manner as it was applied by staff. The resident's physical condition and his/her cognitive status may be contributing factors in determining whether the resident has the ability to remove it. For example, a bed rail is considered to be a restraint if **the bed rail keeps a resident from voluntarily getting out of bed in a safe manner due to his/her physical or cognitive inability to lower the bed rail independently.** Similarly, a lap belt is considered to be a restraint if the resident cannot intentionally release the belt buckle.*

Action Items:

- ☐ Review policies related to bed rails.
- ☐ Conduct audit of residents with bed rails to ensure bed rails do not present a restraint.
- ☐ Train staff and communicate with residents and families about safe alternatives to bed rails for bed mobility and fall prevention.