



Physical Environment Implementation Checklist (F919)

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.

§483.90 Physical Environment – F919 Resident Call System

GUIDANCE (p. 809)

New Guidance:

This requirement is met only if all portions of the system are functioning (e.g., system is not turned off at the nurses' station, the volume too low to be heard, the light above a room or rooms is not working, no staff at nurses' station), and calls are being answered. For wireless systems, compliance is met only if staff who answer resident calls have functioning devices in their possession and are answering resident calls.

The call system must be accessible to residents while in their bed or other sleeping accommodations within the resident's room.

The call system must be accessible to the resident at each toilet and bath or shower facility. The call system should be accessible to a resident lying on the floor.

Action Items:

- ❑ Inspect all resident rooms for call systems that are accessible to each individual resident in bed or sleeping accommodation. Ensure that call system allows residents to directly contact nursing home caregivers.
- ❑ Inspect all toilet and bath/shower facilities, including those in resident rooms, for call systems that are accessible to residents, including if a resident is lying on the floor. Ensure that call system allows residents to directly contact nursing home caregivers.
- ❑ Develop/update process and protocol for routine inspection and testing of call system to confirm accessibility by resident and direct contact to nursing home caregivers. Maintain records of inspections for survey support.

PROBES (p. 809)

New Guidance:

Residents and their representatives should be interviewed about whether calls are being answered.

- *Has the call system been in need of repair recently? If yes, ask:*
 - *What did the facility do if the call system was not working?*
 - *How many times was the call system non-functional/not operating?*
 - *Were any needed repairs made timely?*
 - *How long was the call system non-functional/not operating?*

Does the facility have process to routinely ensure the call system for residents is operational?

During a loss of power, will the resident call system be operational or is an alternate means of communicating with the staff put into place?

Action Items:

- ❑ Develop/update process and protocol for routine inspection and testing of call system. Maintain records of inspections for survey support. Train staff on promptly and properly communicating any issues with call system or needs for maintenance.
- ❑ Develop/update protocols for call system alternatives in the event of the call system not working. Ensure alternatives enable residents to directly contact nursing home caregivers, are accessible at bedside and in toilet/bathing facilities, and are accessible to residents lying on the floor. Identify alternatives and develop protocols for use of alternatives that are operational during loss of power.
- ❑ Train staff on implementing and responding to alternative call systems, including communicating with residents / resident representatives on the use of alternative call systems.