



## **Potential Inaccurate Diagnosis/Assessment Implementation Checklist (F641)**

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.

### **§483.20 Resident Rights – F641 Accuracy of Assessments**

#### **GUIDANCE (p. 212)**

New Guidance:

*Note: CMS is aware of situations where practitioners have potentially misdiagnosed residents with a condition for which antipsychotics are an approved use (e.g., new diagnosis of schizophrenia) which would then exclude the resident from the long-stay antipsychotic quality measure. For these situations, determine if non-compliance exists for the facility's completion of an accurate assessment. This practice may also require referrals by the facility and/or the survey team to State Medical Boards or Boards of Nursing.*

Action Items:

- Review policies and processes for completion of assessments using the Resident Assessment Instrument (RAI) / Minimum Data Set (MDS). Ensure that assessments are completed by staff qualified to assess residents' status, needs, strengths, and areas of decline.
- Train appropriate staff on assessment processes including appropriate level of involvement of physicians, nurses, rehabilitation therapists, activities professionals,

medical social workers, dietitians, and other professionals, such as developmental disabilities specialists in assessing the resident, and in correcting resident assessments.

- Audit assessment records to ensure accurate assessment for residents diagnosed with schizophrenia, Tourette's syndrome, or Huntington's disease.