

A Collaborative Approach to Pharmacy F-Tags

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When I first read the regulations for nursing homes as a new Director of Nursing (DON) (something to do when you can't sleep), I thought those that applied to pharmacy, administration, medical directors, and other areas weren't my responsibility. I quickly learned that's not the case and that the DON is particularly responsible for many of them, such as the pharmacy F-tags.

This responsibility, however, can be eased if you have a good working relationship with your Consultant Pharmacist.

What are pharmacy F-tags?

Pharmacy F-tags are specific tags that define minimum expectations that must be met to be in compliance with federal regulations.

These F-tags are found in the Appendix PP of the State Operations Manual. Each tag outlines the expectation and intent of each requirement, provides definitions of terms used within the F-tag, and offers guidance on how to meet the requirements. You'll also find key elements of non-compliance and examples of deficiencies that could be issued. Surveyors use these to determine if the facility is in compliance and what and how significant the issue is.

The following are the pharmacy-related F-tags. Those with an asterisk indicate that they may be cited for substantial care if at a level F, H, I, J, K, or L scope and severity.

- F755: Pharmacy Services/Procedures/Pharmacist/Records
- F756: Drug Regimen Review, Report Irregularities, Act On
- F757: *Drug Regimen is Free From Unnecessary Drugs
- F758: *Free From Unnecessary Psychotropic Meds/PRN Use
- F759: *Free of Medication Error Rate of 5% or More
- F760: *Residents are Free of Significant Med Errors
- F761: Label/Store Drugs and Biologicals

Additional Responsibilities: Cross F-Tags

In addition to citing the above F-tags, a surveyor may cite another F-tag that has a relationship to it. These are called "cross F-tags." Here are some potential cross F-tags that may occur when a pharmacy F-tag is cited. Again, the asterisk means that they may be cited for substantial care if at a level F, H, I, J, K, or L scope and severity.

- F881: Antibiotic Stewardship Program
- F883: Influenza and Pneumococcal Vaccines
- F605: *Chemical Restraint
- F656: Care Plan
- F675: *Quality of Life
- F697: *Pain
- F744: *Treatment/Services for Dementia

Avoiding Citations with DON and Consultant Pharmacist Collaboration

By working together, the DON and the Consultant Pharmacist can prevent or address these F-tags and provide the resident the best quality care in the safest manner. Here are some key activities the Consultant Pharmacist can perform to help you lower your risk of pharmacy-related F-tags:

Monthly medication reviews: The Consultant Pharmacist is responsible for reviewing every resident's medical record at least monthly, and more frequently if needed. As they complete this review, they look for appropriate use of medications, including the use of non-pharmacological interventions first, if indicated; compare medication interventions with the care plan and determine if they match; review the Medication Administration Record (MAR) to ensure it is clear and accurate to prevent any potential medication errors; and assess the timing of med passes and different types of medications and recommend changes to ensure the nurse can administer all medications within the correct time period. Through these reviews, issues with systems

Medication-related audits: Other approaches Consultant Pharmacists can take that can minimize citations are medication administration audits, med room and storage area audits, and reviews of narcotic storage, administration, and destruction.

Infection prevention assistance: The Consultant Pharmacist is a great asset to the Infection Preventionist and the DON when it comes to monitoring 72-hour time outs and appropriate antibiotic use, utilizing the antibiogram, and culture reports.

Quality of life drug monitoring: Monitoring drug types such as pain medications, antidepressants, and antipsychotics and

making recommendations for different dosages or medications may provide the resident with a better quality of life by allowing them to be more sociable, less drowsy, and more aware of their surroundings. The quality-of-life F-tag applies to all care and services, including pharmaceutical. In all decisions, the residents' needs must be put above the opinions of the healthcare providers, especially when it comes to pain management.

As the DON and Consultant Pharmacist work together to make sure the F-tag requirements are being met, they also ensure that residents are cared for in the best and safest way possible.