Regulatory Update: Compliance Cue

Guidance for Pharmacy-related F-Tags in Phase 3 of the Mega Rule

PharMerica

Gradual Dose Reduction

On June 29, 2022, CMS released Phase 3 updated guidance for nursing home surveyors as part of the Phase 2 and 3 Requirements of Participation. Surveyors will begin using this guidance to identify noncompliance on October 24, 2022.

With the Phase 3 updates, CMS has provided new guidance concerning **F758 – Unnecessary Psychotropic/PRN Use, including clarifying language added to the Gradual Dose Reduction (GDR) section.**

What's Required

CMS historically requires residents on psychotropic drugs to receive Gradual Dose Reduction (GDR) opportunities to find an optimal dose or to determine whether continued use of the medication is benefiting the resident.

Tapering psychotropic medications may be appropriate when:

- the resident's clinical condition has improved or stabilized,
- the underlying causes of the original target symptoms have resolved, and/or
- non-pharmacological approaches have been effective in reducing the resident's symptoms.

The time frames and duration of attempts to taper any medication must be consistent with accepted standards of practice.

The new language added to the Phase 3 guidance provides additional detail on the timing and approach for gradual dose reductions of psychotropic medications:

"Dose reductions should occur in modest increments over adequate periods of time to minimize withdrawal symptoms and to monitor symptom recurrence. Compliance with the requirement to perform a GDR may be met if, for example, within the first year in which a resident is admitted on a psychotropic medication, a facility attempts a GDR in two separate quarters (with at least one month between the attempts), unless clinically contraindicated."

Opportunities to evaluate a GDR include:

- During the monthly medication regimen review
- When the attending physician or prescriber is reviewing the resident's plan of care and progress
- During the quarterly MDS review

CMS also provides new additional guidance related to GDRs, available through the following resources:

- The American Psychiatric Association Practice Guidelines on the use of Antipsychotics to Treat Agitation or Psychosis in Patients with Dementia
- Discontinuing Medications: A Novel Approach for Revising the Prescribing Stage of the Medication-Use Process

Steps to Facility Compliance

- Review current policies and procedures with relevant staff to ensure competency with Phase 3 Regulatory Updates.
- When attempting GDR or tapering of psychotropic medications, reduce the dose of medication in small increments over an adequate amount of time to minimize the potential adverse effects.
- Ensure patient specific factors such as complete medication regimen, coexisting disease states, and individual risk factors are considered when determining the time frame and duration of gradual dose reduction attempts.
- Provide close monitoring of resident while medications are tapered to assess for side effects, changes in behavior, or withdrawal symptoms.

How PharMerica Can Help

- PharMerica consultant pharmacists can assist in identifying and documenting GDR opportunities, attempts, and non-pharmacological interventions in the resident's care plan.
- Work with your PharMerica consultant pharmacist to create a GDR tracking and documentation system that works for your facility and will prepare you for survey inspections!