

## Unnecessary Antibiotic Use



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.

Within the Phase 3 updates, CMS has provided new guidance under **F757 – Drug Regimen is Free from Unnecessary Drugs**, directing surveyors to additionally consider facility compliance with **F881 – Antibiotic Stewardship Program** if the survey produces evidence of unnecessary antibiotic use.

The updated guidance is found in an additional “Note” in the Key Elements of Noncompliance section for F757 and F758, and directs surveyors to assess the facility’s fulfillment of the Antibiotic Stewardship Program requirement.



### What’s Required

**§483.80(a) “Facilities must establish an infection prevention and control program (IPCP) that must include an Antibiotic Stewardship Program that promotes the appropriate use of antibiotics and includes a system of monitoring to improve resident outcomes and reduce antibiotic resistance.”**

The new Phase 3 updated guidance expands on the potential for unnecessarily prescribed antibiotics to be cited at **both F757 and F881**.

Surveyors are directed to consider if the unnecessary use of an antibiotic is the result of a facility not implementing part or all of an Antibiotic Stewardship Program. If a surveyor can show a facility does not have, or is not implementing an Antibiotic Stewardship Program, the F881 citation may be additionally enforced.

Facilities are required to maintain an Antibiotic Stewardship Program that utilizes:

- Infection assessment tool
- Monitoring of antibiotic use
- Feedback and education to prescribing providers

Antibiotic use protocol(s) can address the above requirements through antibiotic prescribing practices that include documentation of the indication, dose, and duration of the antibiotic; laboratory report review to determine if the selected antibiotic is warranted or if change is needed; and monitoring systems such as antibiotic use reports and/or antibiotic resistance reports.



### Steps to Facility Compliance

- Review current antibiotic use protocol(s) with relevant staff to ensure compliance and competency with Phase 3 regulatory updates.
- Ensure facility is fully utilizing an Antibiotic Stewardship Program that encompasses all CMS requirements: infection assessment tool, monitoring of antibiotic use, or feedback and education to prescribing provider.



### How PharMerica Can Help

- PharMerica consultant pharmacists will provide detailed review of antibiotic courses of therapy during their visits.
- [PharMerica's Nursing Facility Antibiotic Stewardship Program](#) can help you address the CDC's core elements.
- An Antibiotic Stewardship Program pharmacy consult is available for timely assistance in evaluating on a case-by-case basis to ensure appropriate antibiotic selection, dose, frequency, and treatment duration.