

PharMerica Follow Up QAPI, Compliance and Ethics Program, Physical Environment, and Nursing Services Webinar

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Thank you for attending our recent webinar on October 11th. Our expert speakers Nancy Tuders and Rebecca Wingate would like to share additional educational content on this important topic.

Follow Up Questions & Answers

Q. If RNs work 11pm-7am, does that count as 8 consecutive hours? Would that be considered to meet the requirement?

A. The rule is 8 hours total so if RNs clock out for a meal break, that technically is 7.5 hours. Previously, we would not have seen an issue, but with new CMS guidelines in place, it certainly could be. The recommendation would be to pay through the meal break so that RNs are clocked in for 8 total hours.

Q. How do we handle the PBJ statement to deduct mealtimes even if someone doesn't clock out?

A. Let's first agree that not taking a meal break should never be the norm, but acknowledge that sometimes people cannot take a meal break in the middle of a fast-paced shift. The guidelines suggest that DONs will not be able to change the PBJ unless the individual truly forgot to clock out and clock back in on their shift break.

Q. Can you clarify the 1 day in a quarter or the 4 days in a quarter if RN hours are missing regarding sufficient staff definition?

A. If your facility does not have RN coverage for 4 days or more, it would affect your 5 Star rating as well as potentially cause an Insufficient Staffing F-Tag. CMS is saying, based on what they observe with the new Guidance, that you could get cited for not having RN coverage for 24 hours just 1 day, depending upon the needs of the residents if they find an issue with care.

Q. The 8-hour consecutive RN coverage requirement has been a great subject of debate. Some of our RNs work 10pm-6am or 11pm-7am and we have been told that they do not meet the requirement. Can you advise on this?

A. An appropriate solution to this might be to increase RN hours to 8.5 to allow for a meal break. Or a facility could decide not to have RNs clock in and out for the meal break, but instead pay during the 30-minute break. The hours can be day shift, PM shift, or NOC shift for the RN coverage according to the SOM, but must be 8 consecutive hours.

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