Guidelines for Documentation
Lesson Objective

The inadequate and/or inaccurate completion of surveyor tasks during an investigation of potential deficiencies could have an impact on the legal process.

These guidelines assist the surveyor in conducting a comprehensive investigation, which will better support the legal process:

- Documentation guidelines
- Interview guidelines
- Observation guidelines
- Record review guidelines

After completing this lesson, you will be able to determine the information and documentation needed to support a deficiency.
Introduction to Surveying for Non-Long Term Care

Lesson 3—Guidelines for Documentation

Documentation Guidelines

Proper documentation is essential, as surveyor notes are significant in the legal process.

Surveyor notes could potentially be reviewed by the entity’s attorney and used as hearing exhibits by the Government attorney.

A surveyor can ensure his/her notes are helpful in proving the government’s case by doing the following:

- Using complete sentences so that the information can be easily recalled, upon review at a later date
- Adding the appropriate tag number to notes where applicable
- Highlighting sentences that are pertinent to a deficiency
- Refraining from adding personal comments of any nature
Interview Guidelines

The following guidelines assist a surveyor in obtaining clear and complete information during the interview process.

The surveyor should:

- Seek corroborating information
- Note the details
- Note both the question and the answer
- Provide a written explanation of the reasons the entity has given to explain negative findings or outcomes
Seek Corroborating Information

If areas of concern arise from patient interviews, the surveyor should attempt to investigate using means that are appropriate for the situation. These means might include:

- Interviews with patients, staff, and families
- Review of written entity information, such as policies and procedures
- Scrutiny of the admission rights information given to patients

Sometimes sources will not provide corroborating information. If this is the case, the survey team should determine (during the decision-making phase) if the requirement is met or not met using information obtained from patient interviews.
Note the Details

When documenting interview statements, a surveyor will need complete and accurate information about:

- The identity of the interviewee, including their name and relationship to the entity or patient
- When the interview occurred, including the date and time
- Where the interview occurred, such as the exact location within the entity
- The status of the interviewee including how long that person has been employed and in what capacity
- Nonverbal cues such as facial expressions, body language, and eye contact observed during the interview
Note the Question and Answer

When documenting interview statements, the surveyor should accurately record the interviewee's statements in addition to their own questions and responses.

Doing this will assist a judge in understanding the questions and responses given by all parties involved, should the interview notes be used as evidence in a hearing.
Explain Reasons Given by the Entity

A surveyor should document any reasons or justifications the entity has given to explain negative findings or outcomes. The surveyor should take the entity's information into account along with other evidence to determine whether there is a deficiency. An entity's rationale alone should not be considered if it conflicts with other evidence obtained during the investigation.
Three Types of Interviews

Interviews can be further broken down into types, which are:

- Patient Interviews
- Family interviews
- Staff interviews
Patient Interviews

A patient's capacity to observe and report is significant during an interview.

When speaking with a patient:

- Create an anonymous identity for the patient consistent with what has been created for other patients during the survey.
- Ask questions pertinent to the patient's care and document anything related to the potential deficiency.
- Document exact quotes from the patient.
- If a patient exhibits unusual behavior, such as talking to a relative who is not present, review the medical record to determine if the patient has identified cognitive issues.
Family interviews

There are times when a surveyor will need to interview family members or friends.

The guidelines for a family interview include:

• Document the relationship of the family member or friend to the patient.

• If the family member or friend is providing information that will be used in the deficiency, obtain their name, address, and phone number since this individual may be contacted later to provide a sworn statement for a hearing and may be asked to testify in person or via telephone.

• If it is pertinent to the deficiency, ask the individual how often, what time of day, and for how long they visit the patient.
Staff Interviews

When conducting interviews with staff members, the surveyor should follow these guidelines:

- Obtain staff members' identities and positions.
- Always obtain the staff members' first and last names.
- Create anonymous identifiers for staff members by combining their position (such as a Certified Nursing Assistant (CNA) or Registered Nurse (RN)) and a code. For example, CNA #1, RN #5, and so forth.
- Include a roster in the notes so that individuals can be identified at any hearing. The roster provides a "cross-reference" between the individual and the identifiers used in the surveyor's notes and Statement of Deficiencies.
- If staff members provide information that results in a deficiency, make sure they are in a position to know about the facts involved in the deficiency.
Knowledge Check

Which of the following is a guideline for proper documentation? Select all that apply.

- a. Truncate words
- b. Use abbreviated sentences
- c. Highlight sentences that are pertinent to a deficiency
- d. Use complete sentences

Correct. A surveyor must be able to easily recall the event when reviewing past survey notes. Highlighting sentences that are pertinent to the deficiency and using complete sentences aid in that process.
Knowledge Check

Which of the following is a guideline for proper documentation? Select all that apply.

- a. Truncate words
- b. Use abbreviated sentences
- c. Highlight sentences that are pertinent to a deficiency
- d. Use complete sentences

Incorrect: A surveyor must be able to easily recall the event when reviewing past survey notes. Abbreviated sentences or truncated words may lead to confusion.
Observation Guidelines

Documentation of observations must be very specific. A surveyor should try to observe the situation through a judge’s eyes and ears. This practice will train the surveyor to observe and write deficiencies with precision.

Documentation should include:

- Specific dates and times
- Answers to the questions who, what, where, when, and why
- Quotes, with quote marks only around the actual statement
- Detailed descriptions of observations
Observation Practice

Observations are the primary method that surveyors use to gather information. During your observations, it is important to not only recognize what should be present and is not, but also what is present, but shouldn’t be.

In this emergency room setting, what items would prompt you to interview a staff member or request a policy and procedure manual?

Write down your observations.
Observation Findings

After you have finished documenting your findings, select the graphic to see an enlarged view of the emergency room.

Select the items in the emergency room to receive feedback on the types of information you would look for. For example, select the medication cart, the uncapped needle, and the IV equipment.
Record Review Guidelines

A surveyor's record reviews will better support the legal process if the following guidelines are used:

- Identify which records are needed
- Review, copy, and document information
Identify Needed Records

Some records may contain information that is relevant to a deficiency. Because of this, it is important for a surveyor to properly identify these records. Examples include:

- Patient clinical records
- Relevant hospital records
- Entity policies and procedures
- Grievance files
- Personnel files

Surveyor notes should specify where the record information came from, using descriptions that are identifiable to both the medical and non-medical population.
Review, Copy, and Document Information

A surveyor should always review and document information that may show that an entity has violated a specific requirement. This information should be copied, as it supports the documented findings.

For example, if the surveyor discovers that a patient had been burned by scalding hot water and the entity did not take action for over 24 hours, the surveyor should copy any documentation that supports this discovery.
Reviewing Records, Corroboration, and Copies

If one entity document discusses an incident, the surveyor should look for other information that tells more of the story or corroborates the incident.

For example, nurse notes may tell part of the story about weight changes in a patient; the weight sheet will provide additional information.

Copies help to prove the deficiency to a judge. In cases where the entity has made post-survey changes in records, the surveyor’s copies will show what was on file at the time of the survey.
Knowledge Check
Which items are records than can be used to identify a deficiency? Select all that apply.

- a. Grievance files
- b. Patient charts
- c. Entity policies
- d. Quotes

Correct: Some records, such as grievance files, patient charts, and entity policies, may contain information that is relevant to a deficiency and should be properly identified. Quotes are important in the investigation process; however, they are not considered a record.
Knowledge Check
Which items are records that can be used to identify a deficiency? Select all that apply.

a. Grievance files
b. Patient charts
c. Entity policies
d. Quotes

Submit

Incorrect: Quotes are important in the investigation process, however, they are not considered a record.

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Key Points

The key points to remember about this lesson include:

- Surveyor notes could potentially be reviewed by the entity’s attorney and used as hearing exhibits by the Government attorney. Be sure to follow the guidelines for effectively documenting observations, interviews, and document/record reviews.

- Observations are the primary method that surveyors use to gather information. During your observations, it is important to not only recognize what is present, but should not be, but also what is not present, but should be. Be sure to document specific details from your observations.

- When interviewing patients, family, and staff, be sure to accurately document all information from the interview (who, what, why, when, and where).

- When reviewing records, be sure to identify, review, copy, and document all the records that are necessary to support the deficiency.
Congratulations!

You have just completed this lesson. To continue within this module, select the Menu button located on the bottom of your screen. Then, select the next lesson in the series.

To complete this course at a later time, return to the course menu area using the Exit button at the bottom of your screen. You can then log out of the course.