

CMS REFORM OF REQUIREMENTS FOR LONG-TERM CARE FACILITIES: IMPACT ON PHARMACY SERVICES

PHASE 1: STARTED 11/28/2016

The Pharmacist Must Report Irregularities to:	Response to Pharmacist Reports	P&P for Drug Regimen Review	Updated Definition of "Irregularity"
<p>Attending Physician</p> <p>Director of Nursing</p> <p>Medical Director</p> <p>Report must include resident's name, relevant drug, and irregularity</p>	<p>Attending Physician must document in the medical record:</p> <ol style="list-style-type: none"> 1) The irregularity that has been reviewed 2) The action that has been taken to address the irregularity 3) If no changes, document the rationale in the medical record 	<p>Facility must develop and maintain Policies and Procedures for the monthly Drug Regimen Review</p> <p>Policy must identify timeframes for different steps in the process</p> <p>Identify steps the Pharmacist must take when an irregularity is identified that requires urgent action</p>	<p>Irregularity = Includes, but not limited to, Unnecessary Drug F329</p> <p>Unnecessary Drug = Any drug when used in:</p> <ol style="list-style-type: none"> 1) Excessive dose 2) Excessive duration 3) Without adequate monitoring 4) Without adequate indications for its use 5) In the presence of adverse consequences 6) Any combinations of the reasons

PHASE 2: BEGINS 11/28/2017

Updated Definition of "Psychotropic Drug"	PRN Psychotropic Drugs	PRN Antipsychotics	Other Important Requirements
<p>"Drug that affects brain activities associated w/mental processes and behavior," including:</p> <p>Antipsychotics Antidepressants Anti-Anxiety Hypnotics</p> <p>All psychotropic drugs will be held to the same standards</p> <p>GDRs, behavioral interventions for all psychotropics</p>	<p>PRN orders for psychotropic drugs are limited to 14 days*</p> <p>Includes: Antidepressants Anti-Anxiety Hypnotics</p> <p>*To extend a PRN order past 14 days, the prescriber must:</p> <ol style="list-style-type: none"> 1) Document their rationale in the medical record 2) Indicate the <u>duration</u> for the PRN order 	<p>PRN orders for antipsychotic drugs are limited to 14 days <u>No Exceptions</u></p> <p>Cannot be renewed unless the prescriber evaluates the resident for the appropriateness of that medication</p> <p>After the evaluation, a <u>new order</u> could be written for 14 days</p>	<p>\$483.75 Initial QAPI Plan: Present to state survey agency</p> <p>\$483.80 Antibiotic Stewardship:</p> <ul style="list-style-type: none"> - Antibiotic protocols - A system to monitor antibiotic use <p>Discharge Summary/Medication Reconciliation of pre-discharge and post-discharge medications</p>