OHA Nurse Staffing 2017 Year in Review & Plan of Correction Discussion

Dana Selover, MD, MPH – HCRQI Section Manager Anna Davis, JD – Nurse Staffing Policy Analyst Public Health Division



- OHA surveyors completed 22 on-site surveys.
- All 22 survey reports are available at <u>www.healthoregon.org/nursestaffing</u>.
- The 2017 surveys are now in the Plan of Correction process.
- Surveys focused on several key areas:

Nurse staffing postings and record keeping;
Nurse staffing committee operations;
Nurse staffing plan requirements; and

 \odot Nursing staff member meals, breaks and OT.



Aggregate 2017 survey results

- Nurse staffing postings and record keeping:
 - Complaint notices had 76% citation rate for all hospitals surveyed;
 - Anti-retaliation notices had 86% citation rate for all hospitals surveyed; and
 - Record keeping had 90% citation rate for selected units.



Aggregate 2017 Survey Results

- Nurse staffing committee operations: The citation rate for requirements in this category ranged from 5% to 100% for all hospitals surveyed. Some requirements were only cited at 1 or 2 hospitals, others were cited at all hospitals. Most frequently cited deficiencies were:
 - Charter does not include required charter elements;
 - Staffing committee does not have equal numbers of nurse manager and direct care members with direct care representation for all units;
 - Noncompliance with meeting requirements of quorums, equal voting, etc.; and
 - Minutes do not include required information.



Aggregate 2017 Survey Results

- Nurse staffing plan requirements are reviewed for selected units. The citation rate for requirements in this category ranged 0 to 94%. Some requirements were only cited in only a few units, others were cited in almost all units surveyed. Most frequently cited deficiencies were for failure to consider/include:
 - Tasks not related to providing direct care including meal and rest breaks;
 - Qualifications & Competencies Skill mix;
 - Acuity and nursing care intensity;
 - Plans must be approved by staffing committee;
 - ADT and unit activity;
 - Total diagnoses;
 - $\circ~$ Establish minimum numbers of NSMs on specified shifts; and
 - Nationally recognized evidence-based standards and guidelines.



Aggregate 2017 Survey Results

- Nursing staffing member meals, breaks and OT: The citation rate for requirements in this category ranged from 86% to 100%. The citation rate reflected:
 - Review of specific employees' timekeeping for selected units;
 - Missed meals and breaks as well as failure to document meals and breaks for selected units;
 - Timekeeping records did not differentiate between voluntary OT and mandatory OT for selected units; and
 - Written OT policies at surveyed hospitals did not reflect current regulations or policies did not exist.



Nurse Staffing Plans of Correction

- After a report is issued the hospital has 30 business days to submit a Plan of Correction (POC).
- OHA has revised the POC guidance document. These are the highlights of that guidance:
- The POC must include:
 - A detailed description of how the hospital plans to correct the deficiency identified in each deficiency statement;
 - A description of how the hospital will implement the plan to correct the deficiency;
 - A timeline or date by which the hospital expects to implement the corrective actions;
 - The description of monitoring procedure(s) that the hospital will perform to prevent a recurrence of the specific deficiency identified; and
 - The title of the person who will be responsible for implementing the corrective actions described.



Nurse Staffing Plans of Correction

- The hospital may involve the nurse staffing committee to assist in finding and implementing solutions to the cited deficiencies.
- The POC should not:

Attempt to disprove the findings;

 \odot Propose a correction to a specific finding; or

 Restate the statute or administrative rule as the proposed correction.

• To date virtually all POCs have been deemed insufficient.



Nurse Staffing Information: www.healthoregon.org/nursestaffing

Anna Davis, JD Nurse Staffing Policy Analyst <u>anna.l.davis@state.or.us</u> (971) 673-2950 Lisa Finkle Nurse Staffing Advisory Board Specialist <u>lisa.k.finkle@state.or.us</u> 971-673-2755

Additional Resources:

Dana Selover, MD, MPH Section Manager <u>dana.s.selover@state.or.us</u> (971) 673-0540

HFLC Information:

General Inquiries <u>mailbox.hclc@state.or.us</u> (971) 673-0540



