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

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- 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: <a href="http://www.healthoregon.org/nursestaffing">www.healthoregon.org/nursestaffing</a>

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#### **Additional Resources:**

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