January 12, 2015

Q: What are the requirements for staff posting under F356?

A: Under F356, the LTC facility must post certain data requirements (facility name, current date, staffing information and resident census), meet certain posting requirements, have public access to posted nurse staffing data and the facility must meet the data retention requirements. F356 requires the facility to post on each shift, the total number and actual hours worked for nurses (both registered and licensed practical) and certified nurse aides directly responsible for resident care. This information must be posted on a daily basis at the beginning of each shift. It must be in a clear and readable format and in a prominent place readily accessible to residents and visitors. CMS has stated that this information does not have to be separately posted on each unit. The facility must make the staffing data available to the public for review upon request. The facility must maintain the posted daily nurse staffing data for a minimum of 18 months.

CMS recently stated that the main compliance issue with regard to the staff postings has been the failure of the facility to post the actual hours worked. CMS requires that the poster include the exact hours staff are working.