June 8, 2015

Q: How does a LTC facility comply with F386 and F387 (483.40b and c – physicians review and signing all resident orders every 30 or 60 days) when the facility is utilizing an electronic medical record system?

A: Pursuant to guidance from IDPH, the LTC provider needs to check with their Electronic Health Records (EHR) Provider to verify that their product fully complies with tags F386 and F387 (and all other federal requirements). IDPH stated that daily/new orders can be signed electronically, but the monthly review must be signed manually by the physician. It is permissible for the manually signed monthly review to then be scanned and made part of the electronic medical record. It is the LTC facility’s responsibility to make sure their electronic health record meets the federal requirements for Medicare/Medicaid. As the use of electronic medical records increases, federal CMS may make some changes to the federal requirements, but what is stated above is the current guidance/requirement/process as it relates to F386 and F387.

Clarification/Correction of the June 1 News Brief Question of the Week. It has been brought to my attention that part of the answer given with regard to Alzheimer’s/dementia care was confusing. To clarify, any LTC facility can provide Alzheimer’s/dementia care if they so desire/have the capability. However, the LTC facility cannot advertise they provide Alzheimer’s/dementia care through an Alzheimer’s Special Care Unit or Center unless they are IDPH approved as noted/defined under Subpart U of the IDPH LTC requirements.