May 15, 2017

Q: Survey Issue – Pay Special Attention!

Did federal CMS change the bed/side-rail guidance in the November adoption of the new Requirements of Participation (ROPs)?

A: YES, and this appears to be a special focus of surveyors. Facilities need to check all of your assessments, consents and MDS/care plans with regard to this new requirement below. An old assessment prior to November 28, 2016 is not acceptable. A new assessment is required. Facilities need to re-assess all their residents with side/bed rails and determine/document that the facility attempted to use less restrictive alternatives prior to installing bed/side rails, even if they are just assistive devices/enablers for resident bed mobility and positioning. The facility must document that the risks/benefits were discussed with the resident and/or the resident representative prior to use. The facility also needs to verify that consents are current and the intervention is care-planned appropriately. Section 483.25 – Quality of Care – under subsection (n) states:

(n)Bed rails. The facility must attempt to use appropriate alternatives prior to installing a side or bed rail. If a bed or side rail is used, the facility must ensure correct installation, use, and maintenance of bed rails, including but not limited to the following elements.

1) Assess the resident for risk of entrapment from bed rails prior to installation.

2) Review the risks and benefits of bed rails with the resident or resident representative and obtain informed consent prior to installation.

3) Ensure that the bed's dimensions are appropriate for the resident's size and weight.

4) Follow the manufacturers' recommendations and specifications for installing and maintaining bed rails.

Surveyors will be reviewing the facility’s written assessment and documentation of the above. Failure to follow this guidance could result in Immediate Jeopardy citations.