March 5, 2018

Q: I wanted to get your input on a question regarding Gradual Dose Reduction (GDR) requirements in Skilled Nursing and Intermediate Care Facilities. I’m aware that the new RoP by CMS state that all psychotropics should have a GDR attempt twice within the first year, and then on a yearly basis thereafter. From what I gather, this is referring to all psychotropics - anti-depressants, anti-psychotics, hypnotics and anxiolytics. However, this conflicts with Illinois' requirement regarding hypnotic drugs. According to the Illinois Administrative Code, for hypnotics "a gradual dose reduction should be attempted at least three times within six months before one can conclude that a gradual dose reduction is "clinically contraindicated." What are your thoughts on this? Do you think I should be following the stricter regulation of the two for hypnotics?

A: In checking with IDPH, they stated that the facility would be expected to be in compliance with the stricter of the two regulations. We will ask IDPH to change the state regulation to be the same as the new federal requirements, but until that happens, the facility needs to follow the state requirements for GDR because they are more stringent than the federal requirements.