Q: When does Phase 3 of the new RoPs go into effect? Is it November of 2018 or November of 2019? What does it entail?

A: The Requirements of Participation (RoPs) Phase 3 requirements go into effect on November 28, 2019. Although they go into effect in 2019, facilities should begin preparing now for implementation. Key areas that will go into effect in Phase 3 are trauma informed care, QAPI/QAA data collection and monitoring, the infection preventionist requirement, implementation of a compliance and ethics program and the numerous training requirements. There are and will be programs offered by IHCA and AHCA (and others) to assist you in understanding the federal/state focus on behavioral health, including new guidance for staffing and training, behavioral difficulties and dementia care. Trauma informed care will require your staff to have some expertise in how to identify and how to respond to your individual residents with issues such as post-traumatic stress disorder, substance abuse, late effects of trauma, etc. Each facility will have to put a functional/ongoing QAPI process in place, have an infection preventionist who has had the required training and begin putting in place a training program to meet all of the various federal training requirements. IHCA will provide additional information regarding Phase 3 as it becomes available.