

MEMORANDUM

Texas Department of Human Services * Long Term Care/Policy

TO: LTC-R Regional Directors
Section/Unit Managers

FROM: Marc Gold
Section Manager
Long Term Care-Policy
State Office MC: W-519

SUBJECT: Regional Survey & Certification Letter #99-08

DATE: March 9, 1999

The attached RS&C Letter is being provided to you for information purposes and should be shared with all professional staff.

- RS&C Letter No. 99-08 -- Determining the Oral/ Dental Status of Residents in Long Term Care (LTC) Nursing Facilities; Call Beverly Tucker, Section Manager, Professional Services, at (512) 438-2631.

If you have any questions, please direct inquiries to the individuals or sections listed above.

~Original Signature on File~

Marc Gold

Attachment

DEPARTMENT OF HEALTH & HUMAN SERVICES
Health Care Financing Administration

Region VI
1301 Young Street, Room 833
Dallas, Texas 75202

REGIONAL SURVEY AND CERTIFICATION LETTER NO: 99-08

To: All State Survey Agencies (Action)
All Title XIX Single State Agencies (Action)

Subject: Determining the Oral/ Dental Status of Residents in Long Term Care (LTC) Nursing Facilities

As a result of concerns brought to the attention of the Regional Office and the continuing emphasis on ensuring residents in long term care facilities are furnished the care necessary to meet the Federal requirements, the Regional Office is providing guidance to surveyors on how to determine the dental/oral status of LTC residents. These procedures do not represent new requirements, they are merely a structure by which the surveyors may ascertain whether or not the existing regulations are met.

Procedures For Review Of Dental/Oral Status Of Residents

The protocol consists of four components:

- (1) Interviews with residents and the families of nonverbal residents
- (2) Physically viewing residents' mouths
- (3) Record review to determine:
 - (a) the accuracy of MDS and care plan information,
 - (b) if residents' dental/oral needs have been care planned and implemented,
 - (c) if the facility has appropriately worked with the residents to assist them in obtaining dental care.
- (4) Observation of the dental/oral care furnished to residents.

The review of dental/oral status and care is made using the sample chosen by the surveyors as part of the standard recertification survey. Although they may do so if desired, the surveyors do not have to add residents to the sample simply to look at their dental/oral care.

(I) Resident and Family Interviews

The surveyor should add the following questions to all resident and family interviews:

- (A) How often are your (or your family member's) teeth brushed? How are they brushed (toothbrush and/or glycerine swabs etc.)?

- (B) Who is responsible for brushing your (or your family member's teeth)?
- (C) When was the last time you (or your family member) saw a dentist?
- (D) Do you have dentures or a partial? Do the dentures /partial fit?
- (E) Do you (or your family member) have any dental/oral problems?
- (F) Do you (or your family member) have any pain in your mouth?
- (G) If dental care is needed, has the facility offered to help you get the dental care required? What did the facility do to assist you in getting dental care?

(II) Visual Observation of the Residents's Dental Status

The surveyors should look at the dental condition of all residents included in the sample for comprehensive record review and all total care residents included as part of the focused review due to dental or weight loss concerns. Whenever possible the surveyors should request the resident open his or her mouth and permit the surveyor to look inside. If the resident is unable to open his or her mouth upon the surveyor's request, the surveyor should have a staff member open the resident's mouth and allow the surveyor to observe the resident's dental/oral status. It is recommended that both the facility staff member/s and the surveyor/s wear disposable gloves during this procedure. If desired, this examination may be combined with the observation of the dental/oral care furnished to the resident. While the resident's mouth is open, the surveyor should look inside and make the following determinations:

- (A) Evaluate the resident's oral hygiene. Look for long-term buildup of plaque and food.
- (B) Determine if there are broken or damaged teeth and/or dentures.
- (C) Determine if any other oral problems exist that require the immediate attention of a dentist. These may include but are not limited to:
 - (1) soft tissues lesions
 - (2) loose teeth or dentures
 - (3) abscess(es)
 - (4) gum disease

(III) Record Review

For each resident included in the sample as part of the comprehensive record review and for total care residents for whom a focused review was done due to dental and/or weight loss concerns the surveyors should make the following determinations.

- (A) Does the MDS accurately reflect the resident's current dental status? If not, the surveyor may cite the 42 Code of Federal Regulations (CFR) section 483.20 (b) Resident Assessment. For example, Tag F272, Comprehensive Assessment, would be

cited if the resident's annual assessment indicates there are not dental/oral problems, but the surveyor's observations show dental/oral problems which would have existed at the time the annual review. Tag F274, Frequency, may be cited if the dental condition results from a significant change in the resident's status. F276, Review of Assessment, would be used if the dental condition had altered since the annual assessment, but was not a result of a significant change.

- (B) Does the care plan accurately show the resident's current dental status? If not, the surveyor may cite 42 CFR section 483.20 (d) Care Plans. For example, if the care plan indicates the resident uses dentures to chew his or her food, but the surveyor finds that the resident's dentures are missing or no longer fit then the surveyor may cite F280 because the facility failed to revise the care plan as needed when the resident's condition changed.
- (C) Does the facility furnish oral/dental care to the residents as needed? If not, the surveyor may cite 42 CFR 483.25 (a) (3). This section, specifically tag F312, requires that a resident who is unable to carry out the activities of daily living receives the necessary services to maintain good oral hygiene.
- (D) If the resident has dental concerns, did the facility take the actions necessary to assist the resident in obtaining the dental care that he or she needed? Is there documentation showing what was done? If not, the surveyors may cite 42 CFR 483.55 Dental Services.

(IV) Observations Of The Dental/Oral Care Furnished To Residents

The surveyors should observe the dental/oral care furnished to all residents for whom a comprehensive record review was done and for all total care residents for whom a focused review was done due to dental and/or weight loss concerns. It may be more convenient for the residents, surveyors and facility staff if the surveyor makes his or her visual determination of the resident's dental/oral status while viewing how the facility furnishes oral care to the resident. The surveyors should observe the delivery of oral care to each appropriate resident once. The surveyor should make the following determinations:

- (A) Did the facility staff furnish oral care to the resident as required by his or her care plan?
- (B) Did the facility staff have the supplies necessary to furnish oral care to the resident?
- (C) Did the facility staff know how to deliver oral care?

If the facility staff does not provide oral care correctly and according to the resident's care plan, 42 CFR 483.25 (a) (3) may be cited. Tag F312 requires that a resident who is unable to carry out the activities of daily living receives the necessary services to maintain good oral hygiene. If the staff does not know how to furnish oral care the surveyors may cite a deficiency in training. If oral/dental concerns are found, the surveyors should look at the long term care nursing facility's procedures for assisting residents in obtaining dental care.

Please note, although certain regulations and tags have been listed as areas in which deficiencies may be cited, this does not mean that these are the only tags which may be used. The surveyor must make a determination on what problems have been found and which tag/s should be cited based on observations, interview and record reviews.

In summary, the requirement for determining the resident's oral/ dental status is not new. The current procedures already require that the surveyors determine whether or not the facility is furnishing the resident with the care and services necessary to attain his or her highest practicable physical, mental and psychosocial well being. This includes oral/dental care. These procedures merely furnish a structure in which to look at the dental/oral care furnished to the residents.

Implementing these procedures will not significantly extend the time needed for conducting a recertification survey. The protocol utilizes the same resident sample as the standard certification survey. Surveyors are requested to add several specific questions when doing the currently required interviews with residents and family members of residents. It requires the surveyors to look in mouths and observe the oral care given to residents for whom comprehensive assessments were done (a maximum of five residents per facility) and total care residents who were included in the sample due to dental/oral or weight loss concerns. The procedures should not add more than a couple of hours to the survey process.

If you have any questions concerning the survey methods in this letter, please contact Karen Herbelin at (214) 767-4422. If you have any questions concerning payment of dental services for Medicaid patients, please contact James Oge or Gary Martin at (214) 767-6301. There are Federal requirements which outline how Medicaid monies may be used to cover the costs of dental care for Medicaid residents in long term care nursing facilities. Thank you for your time and attention to this matter.

Sincerely,

~Signature on File~

Calvin G. Cline, Chief
Survey and Certification Operations Branch