Dialysis in Nursing Homes and Residential Care Facilities

Triumphs and Challenges
Speakers

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Disclosures

- Ms. Markovich and Ms. McMullen work for companies that provide dialysis in nursing homes
- Ms. Payne works for a consulting company that has provided guidance to companies that wish to provide dialysis in nursing homes
Objectives:

• Identify current regulatory requirements applicable to providing dialysis in long term care (LTC) facilities

• Describe challenges of providing dialysis in LTC facilities

• Detail effective options to meet the challenges of providing dialysis in LTC facilities

• Discuss outcomes of patients receiving dialysis in LTC facilities
To Be Clear:

- This session is about dialysis IN nursing homes
  - Not about dialyzing nursing home patients in an outpatient center.
- Acronyms used interchangeably here:
  - LTC: Long term care
  - NH: Nursing home
  - SNF: Skilled nursing facility
## Applicable Regulations

### Federal
- Reimbursement regulations
- The current ESRD quality & safety regulations are silent on dialysis in nursing homes
- However, there is some guidance from CMS...

### State
- Vary greatly from state to state
  - From no regulations
  - To very specific
Federal Guidance for Dialysis IN Nursing Homes

Official: Survey & Certification Letters, 2004
- Based on “old” ESRD regulations
- Currently being updated
  - Potential release date of update: Unknown
Survey & Certification Guidance, 2004

- Separate guidance for:
  - ESRD surveyors
  - LTC surveyors

- Major points:
  - ESRD surveyor expected to visit one or more LTC
  - Contract required between LTC /ESRD
  - Collaboration is expected
    - Infection control practices
    - Machine storage
    - Water treatment
    - Emergency equipment & response
Survey & Certification Guidance, 2004

Staffing requirements
- A qualified ESRD nurse is responsible for training patients/caregivers & LTC staff
- An appropriately trained caregiver provides monitoring of the patient during dialysis
- A licensed health professional “experienced in rendering ESRD care” is on duty to oversee dialysis
  - Perform assessments, observe patients pre/post tx, respond to ER situations, administer injectable meds
- Full IDT provides care
Survey & Certification Guidance, 2004

- Patient Care Plans:
  - Individualized
  - ESRD IDT team responsible to develop plan and communicate with LTC to address patient needs
  - Coordinated with LTC care plan

- Patient Rights & Responsibilities:
  - Patient/family informed of options
  - Aware of grievance/complaint procedures
Survey & Certification Guidance, 2004

QAPI
- Patient outcomes are monitored
- Identified problems are addressed
- Incidents and accidents involving dialysis care in the LTC are reported to both the LTC and the ESRD
What Might New Guidance Include?

Draft Letter “released” in 2012
- A qualified RN, LPN, or Certified PCT must be “present in the room” during dialysis
- No more than 2 patients in a room where dialysis is done
- At least quarterly reassessment/plan of care
  - MSW/RD communicate monthly with LTC staff/patient
  - Care coordinator for each LTC dialysis patient
  - Weekly audits of treatment records
What Might New Guidance Include?

Draft Letter “released” in 2012:
- Monthly face-to-face contact medical staff/patient
- Monthly home visits
- Quarterly competency checks for caregiver
- A qualified RN on site & available to respond throughout the treatment
- QAPI: compare aggregate outcomes of LTC patients with aggregate outcomes of in-center patients
What About State Regulations?

Important to consider all potentially applicable regulations:
- Nurse Practice Acts (NPA) (all 50 states have these)
- ESRD licensing regulations (~ 30 states have these)
- Home health (HH) licensing regulations (multiple states have these)
A Couple of Examples

Texas
- NPA: Only RN can assess
- ESRD licensing
- HH licensing
  - Required to provide care in home
  - Specific rules for HH with “dialysis designation”
    - Only licensed nurses can provide dialysis

Florida
- NPA: specific language addresses home HD
  - Allows non-professionals to give injectable meds as part of home dialysis
- ESRD licensing: No
- HH licensing: No
Why Do Dialysis in Skilled Nursing Facilities?
How Is Hemodialysis Done in Nursing Homes?
What Are the Challenges in Providing Dialysis in LTC?
What About Patient Outcomes?
Conclusion

- Dialysis in SNF is a much needed service
- Improved quality of life and outcomes
- Daily therapy the best option
- Challenging environment to operate in
- Frequent survey activity
Questions?
References


