CMS REFORM OF REQUIREMENTS FOR LONG-TERM CARE FACILITIES: IMPACT ON PHARMACY SERVICES: PHASE 2 – BEGINS 11/28/17

- The Medicare and Medicaid Programs Reform of Requirements for Long-Term Care Facilities include several changes to Pharmacy Services for Phase 2
- General requirements and Pharmacy Action Plan are found below

### UPDATED DEFINITION OF “PSYCHOTROPIC DRUG”

“Drug that affects brain activities associated with mental processes and behavior,” including

- Anti-psychotics
- Anti-depressants
- Anti-anxiety
- Hypnotics

All psychotropic drugs will be held to the same standards

GDRs, behavioral interventions for all psychotropics

### PRN PSYCHOTROPIC DRUGS

**PRN orders for psychotropic drugs are limited to 14 days**

Includes:
- Anti-depressants
- Anti-anxiety
- Hypnotics

*To extend a PRN order past 14 days, the prescriber must*
1. Document their rationale in the medical record
2. Indicate the duration for the PRN order

### PRN ANTIPSYCHOTICS

**PRN orders for antipsychotic drugs are limited to 14 days. NO EXCEPTIONS**

Cannot be renewed unless the prescriber evaluates the resident for the appropriateness of that medication

After the evaluation, a new order could be written for 14 days

### OTHER IMPORTANT REQUIREMENTS

- §483.75 Initial QAPI Plan: Present to state survey agency
- §483.80 Antibiotic Stewardship: Antibiotic protocols A system to monitor antibiotic use
- Discharge Summary/Medication Reconciliation of pre-discharge and post-discharge medications

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### PHARMACY ACTION PLAN

#### GDRs (Gradual Dose Reductions) for all psychotropics. **

- Twice in the first year
- Annually thereafter

Your Remedi Consultant Pharmacist will assist to:

- Identify opportunities for GDRs
- Prompt prescribers for periodic re-evaluation
- Prompt facility to update documentation

#### Remedi SeniorCare will provide a reminder notification to facility via:

**Fax Memo:**
- Reminds staff of CMS requirements to document rationale and duration of therapy if >14 days

**MyRemedi MedAlert:**
- Individuals may subscribe to MedAlerts to receive the CMS reminder via email or text

#### Remedi SeniorCare will call the facility to clarify any PRN antipsychotic order if:

- The order is for >14 days, or
- No duration of therapy is indicated

After a clarifying response is received from the facility, the order will be processed and dispensed.

#### QAPI Plan

- Visit MyRemedi for medication monitoring and quality metrics
  - Medication Summary Dashboard
  - Psychotropic Dashboard

**Antibiotic Stewardship**
MyRemedi’s Antibiotic Dashboard provides clinical, process, and outcome metrics for your stewardship

Print a pre-populated Medication Discharge Summary and Drug Monographs

Real-time data, metrics and order information can be accessed from the Psychotropic Dashboard in MyRemedi

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**Taken from the Revision to State Operations Manual (SOM) Appendix PP for Phase 2, F-Tag Revisions, and Related Issues**