

F756 FAQ's

Regulation F428 Drug Regimen Review now states the pharmacist must report any irregularities to the attending physician, the DON and the facility's medical director. What is the timeframe that the pharmacist must report to the attending physician and the medical director? What is the timeframe that the attending physician must respond do the irregularity report?

The new regulations for Drug Regimen Review now state that the pharmacist report irregularities to the attending physician, medical director, and director of nursing or for the attending physician to respond to the report of irregularities. We expect individual facility policy to address these specific timeframes. An important factor in reporting and responding to irregularities is the potential for or presence of serious adverse consequences. Some irregularities may require immediate notification and response to prevent an adverse consequence to a resident.

Does the pharmacist recommendation have to be placed in the residents chart? Or can it be in a binder located at the nurses' station or DON office?

Per the interpretative guidance for §483.45(c)(4), F756, "The pharmacist is expected to document either that no irregularity was identified or the nature of any identified irregularities. The pharmacist is responsible for reporting any identified irregularities to the attending physician, the facility's medical director, and director of nursing. The timeliness of notification of irregularities depends on factors including the potential for or presence of serious adverse consequences; for example, immediate notification is indicated in cases of bleeding in a resident who is receiving anticoagulants or in cases of possible allergic reactions to antibiotic therapy. The pharmacist must document any identified irregularities in a separate, written report. The report may be in paper or electronic form. If no irregularities were identified during the review, the pharmacist includes a signed and dated statement to that effect."

Additionally the interpretative guidance states, "The pharmacist's findings are considered part of each resident's medical record and as such are available to the resident/representative upon request. If documentation of the findings is not in the active record, it is maintained within the facility and is readily available for review. Establishing a consistent location for the pharmacist's findings and recommendations can facilitate communication with the attending physician, the director of nursing, the remainder of the IDT, the medical director, the resident and his or her legal representative, the ombudsman, and surveyors.

Link to Full Frequently Asked Questions Related to Long Term Care Regulations, Survey Process, and Training: <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Downloads/LTC-Survey-FAQs.pdf>