

The Centers for Medicare & Medicaid Services (CMS) is the federal agency responsible for administering requirements governing long-term care facilities. In October 2016, CMS released a comprehensive update of the regulations to reflect advances in theory and practice of service, delivery, and safety for LTC residents, including a section newly defined as Food and Nutrition Services. This CMS Final Rule specifies a staggered, three-phased implementation process for the regulatory provisions:



PHASE I

How do the New Regulations Impact Food and Nutrition Services?

In Section §483.60 Food and Nutrition Services, the following highlights are significant:

- The Certified Dietary Manager, Certified Food Protection Professional (CDM, CFPP) credential is now listed as the primary qualification for the Director of Food and Nutrition Services in the absence of a full-time dietitian.
- A representative from the Food and Nutrition Services department must be included on the Interdisciplinary Team (IDT). The CDM, CFPP is the only credential listed in addition to the Registered Dietitian Nutritionist that is qualified to participate as defined by scopes of practice.
- While CMS lists the CDM, CFPP credential as the primary qualification for the Director of Food and Nutrition Services, the regulations also acknowledge state requirements for staffing qualifications. Currently, the CDM, CFPP meets requirements in 18 states.

How do the New Requirements Impact Staffing?

According to the requirements, individuals who are currently employed as the designated Director of Food and Nutrition Services prior to November 28, 2016 will have five years to meet the staffing requirements outlined by CMS. Individuals hired after November 28, 2016 must now meet these staffing requirements.

PHASE II

What's Here and Now?

Phase II went into effect November 28, 2017, and includes revised F-Tags, interpretive guidance for existing requirements and a new computer-based, annual LTC survey process. This new survey process is nationwide, blending both elements of the traditional survey and Quality Indicator Survey processes. Nursing facilities are responsible for demonstrating compliance with the Phase I requirements during their 2017 annual surveys and need to focus on both the Phase I and II requirements in order to avoid the potential for survey deficiencies and negative outcomes.

PHASE III

What's Yet to Come? Phase III: November 28, 2019

The CMS-phased approach for the rollout, spreading out implementation of the various requirements over three years, ends with the implementation of Phase III on November 28, 2019. The three phases were categorized based on CMS's assessment of each revision's complexity and the extent to which interpretive guidance and survey processes will need to be revised.

Visit www.ANFPonline.org/CMS for the following resources and more:

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| • Top 10 Facts to Know About the New CMS LTC Regulations | • Phase II Tag Crosswalk: F-Tag Changes Relevant to CDM, CFPPs | • Matrix with Food and Nutrition Instructions |
| • Top 10 Ways to Survive CMS Phase II | • Full List of F-Tag Changes | • New Survey Pathways: Entrance Conference Survey |
| • Federal Regulatory Groups for LTC Facilities | • Critical Element Pathways for Dining and Kitchen | • CMS Regulations Webinar Bundle |

Scope of Practice



NUTRITION / FOODSERVICE MANAGEMENT / FOOD SAFETY / PERSONNEL MANAGEMENT / BUSINESS OPERATIONS

A Certified Dietary Manager, Certified Food Protection Professional (CDM, CFPP) has passed a nationally-recognized credentialing exam offered by the Certifying Board for Dietary Managers. Continuing education is required to maintain this credential. The exam is written by content experts, and administered by an independent professional testing company. The exam consists of 160 questions that have been pre-tested and proven valid and reliable. Questions cover five competency areas which fall under these major headings: Nutrition, Foodservice, Personnel and Communications, Sanitation and Food Safety, and Business Operations. The CDM, CFPP credential indicates that these individuals have the training and experience to competently perform the responsibilities of a certified dietary manager. CDM, CFPPs work together with registered dietitian nutritionists to provide quality nutritional care for clients and perform the following tasks on a regular basis*:

- Conduct routine client nutritional screening which includes food/fluid intake information
- Calculate nutrient intake
- Identify nutrition problems using established guidelines to distinguish between routine and at risk individuals
- Identify food customs and nutrition preferences based on race, culture, religion, and food intolerances
- Implement diet plans and diet orders using appropriate modifications
- Utilize standard nutrition care procedures following ethical and confidentiality principles and practices
- Document nutritional screening data in the medical record and complete forms (i.e. care plans, MDS, etc.)
- Review intake records, conduct visual meal rounds, and document food intake
- Participate in care conferences and review effectiveness of nutrition care
- Provide basic diet information using evidence-based educational materials
- Develop and implement menus that meet individual nutritional needs in accordance with established national guidelines
- Specify standards and procedures for food preparation
- Continuously improve care and service using quality management techniques including quality control standards and food waste policies
- Supervise preparation and serving of therapeutic diets and nutritional supplements
- Manage a sanitary foodservice environment
- Protect food in all phases of preparation, holding, service, cooling, and transportation
- Purchase, receive, and store food following established sanitation and quality standards
- Purchase, store, and ensure safe use of chemicals and cleaning agents
- Manage equipment use and maintenance
- Develop work schedules, prepare work assignments
- Manage goals and priorities for the department, establishing short- and long-term goals and communicating internally and externally
- Interview, hire, and train employees
- Conduct employee performance evaluations
- Recommend salary and wage adjustments for employees
- Supervise, discipline, and terminate employees
- Supervise business operations of foodservice department, implementing cost effective procedures and managing revenue-generating services
- Prepare purchase specifications and orders for food, supplies, and equipment
- Develop annual budget and operate within budget parameters
- Develop and implement department policies and procedures
- Comply with federal and state regulations related to effective food and nutrition services

**Validated by the 2014 Dietary Manager Job Analysis Study performed by Applied Measurement Professionals, Inc., and required by the National Commission for Certifying Agencies (NCCA). The CDM Certification Program is accredited by the NCCA.*