Talking Points for CMS Proposed Rule:
“Medicare and Medicaid Programs; Reform of Requirements of Long-Term Care Facilities”

- On July 16, 2015, the Centers for Medicare and Medicaid Services (CMS) published a Notice of Proposed Rulemaking (NPRM) “Medicare and Medicaid Programs; Reform of Requirements for Long-Term Care Facilities.”

- Proposed reforms to the Food and Nutrition Services (§483.60) training/certification standards for the director of food services in LTC facilities could be met by the Certified Dietary Manager (CDM) credential.

- The proposed CDM requirement is the result of ANFP advocacy over a period of five years:
  - ANFP filed comments (under the name Dietary Managers Association) with CMS in 2010 and again in 2011 in response to Federal Register notices on the Prospective Payment System for Skilled Nursing Facilities.
  - CMS acknowledged the comments and referred them to Survey and Certification staff.
  - ANFP established a dialogue with that office and sent another letter to staff making the case for the Safe Food for Seniors initiative.

- While a victory for ANFP members, aspects of the proposed regulations require further analysis.

- Therefore, an ANFP Task Force will prepare comments to CMS that are due September 14.

- The CMS rulemaking process could take up to a year, and ANFP members are encouraged to direct their efforts towards generating cosponsors for the Safe Food for Seniors Act of 2015.


- The bill (H.R. 3356) is in sync with the CMS proposed regs and will be aggressively pursued.

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