

ADVANCE FEEDING TUBE INTERPRETIVE GUIDELINES

On September 27, 2012 CMS issued revised feeding tube interpretive guidelines to the State Operations Manual ("SOM"). While the actual federal regulation did not change, the SOM changes the interpretive guidelines, which can be found in Appendix PP of the SOM.

CMS deleted F-Tag 321, which addressed the use of feeding tubes unless they were unavoidable and incorporated this guidance into F-Tag 322. This guidance, which was sent to the state survey agencies, is expected to be implemented no later than November 30, 2012. The revised SOM guidance comes with a very useful PowerPoint presentation discussing the changes.

If you have questions or concerns regarding the foregoing or would like additional information, please contact your regular Hall Render attorney, or Todd Selby at tselby@hallrender.com or 317.977.1440; Brian Jent at bjent@hallrender.com or 317.977.1402; or David Bufford at dbufford@hallrender.com or 502.568.9368.