



Not for Profit News¹

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On the Hill

Senator Baucus Releases New Healthcare Reform Proposal

Recently, Chairman of the Senate Finance Committee Max Baucus (D-MT) advanced the pursuit of healthcare reform with the release of his proposal, the *America’s Healthy Future Act of 2009*. The document is not legislative language, rather a 220-page document of concepts that are estimated by the CBO to cost more than \$800 billion over ten years. The



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proposal does not eliminate the market basket update for skilled nursing facilities – yet it seeks to generate savings through a productivity adjustment. The productivity adjustment would reduce the SNF market basket update by an unspecified factor that would account for assumed efficiencies in the way care is delivered over time. AHCA/NCAL is pleased that many of the programs that would impact long term and post-acute care providers have incorporated our suggestions. AHCA/NCAL staff has crafted a summary of the proposal. Until the legislative language is released, many nuances of the proposal will not be known. To view a comprehensive analysis of the proposal, click here.

SOS Please encourage your facilities and family members to use the AHCA “Save our Seniors” advocacy site to express their views; we are at a critical juncture in this process and every voice is needed. In the upcoming days we will be sending out another grassroots “call to action” to help drive the participation that will be essential to our success. Questions? Click to contact David Hebert.

White House Releases Medical Liability Fact Sheet

During his recent address to the joint session of Congress, President Obama announced his proposals for health insurance reform, which included investing in new ways to manage medical liability claims. The White House has released a fact sheet on Patient Safety and Medical Liability. We are encouraged by the release of this fact sheet and will work with Congress and the Administration to advance tort reform initiatives. For more information about AHCA/NCAL’s position on the need for tort reform, click to contact Teresa Cagnolatti.

AHCA/NCAL President Bruce Yarwood Named 25th Most Powerful Person In Healthcare

AHCA/NCAL is pleased to announce that Bruce Yarwood, President and CEO, has been named Modern Healthcare's 25th most powerful person in healthcare for 2009. In his nearly 20 years serving on behalf of AHCA and its diverse and expansive membership, Bruce has been a national force in transforming America’s long term care. As the process of healthcare reform is in full swing, Bruce is well-positioned to steer our profession through these complex waters. Thank you to all AHCA/NCAL members who voted for Bruce!



CMS News

31 Attorneys General Call For The Suspension Of Five Star



In an effort that was spearheaded by Mary Sue Terry, former Attorney General of Virginia, who was working on behalf of AHCA, thirty-one Attorneys General from across the nation sent a letter to Health and Human Services (HHS) Secretary Kathleen

Sebelius, calling for the suspension and revision of CMS' Nursing Home Five Star Rating System. The letter states that the system 'can be misleading and create significant confusion for seniors' and goes on to say that it is imperative for the system to be suspended temporarily and revised, using more appropriate methodology. AHCA will be continuing our efforts to suspend and revise the Five Star Nursing Home system to ensure that appropriate information that truly reflects the quality of nursing home care is available for all consumers. Questions? Click to contact Lyn Bentley.

Workforce

Card Check Likely Stalled Until Next Year

Senator Tom Harkin (D-IA) has been a key proponent of the *Employee Free Choice Act (EFCA)* and has been working with a small group of Senators to devise a compromise bill over the last several months and has succeeded the late Senator Edward Kennedy (D-MA) as Chair of the Health, Education, Labor and Pensions Committee. In his first comments as Chair, Senator Harkin shared that EFCA remains a high priority but he did not anticipate taking the issue up until next year, since Massachusetts will not be able to fill Kennedy's seat quickly. AHCA/NCAL continues to oppose this bill in any form. For more information, contact Francesca Fierro O'Reilly.

HHS Announces \$13.4 Million in Financial Assistance to Support Nurses

HHS has announced the release of \$13.4 million for loan repayments to nurses who agree to practice in facilities with critical shortages and for schools of nursing to provide loans to students who will become nurse faculty. The funds were made available by the *American Recovery and Reinvestment Act (ARRA)*. The awards come from two programs administered by HHS' Health Resources and Services Administration (HRSA) including:

- The Nurse Education Loan Repayment Program and the Nurse Faculty Loan Program: \$8.1 million will be awarded competitively, to help 100 registered nurses pay their nursing education debts. The program repays 60 percent of the loan balance of registered nurses in exchange for two years of service at not-for-profit facilities with a critical shortage of nurses. AHCA has been, and will continue, to fight to include for-profit facilities in this program.
- The Nurse Faculty Loan Program: \$5.3 million go to schools of nursing to support the training of 500 masters and doctoral nursing students who plan to become nurse faculty after completing their education. Following graduation, loan recipients may cancel up to 85 percent of the loan principal and interest in exchange for four years of services as a full-time nursing faculty at a school of nursing.

Veterans Affairs

New IT Security Addendum in Contracts

Of concern to AHCA regarding Department of Veterans Affairs (VA)/nursing facility contracting issues is a new information technology (IT) security addendum that has been added to VA/civilian nursing facilities contracts which is infeasible for NFs to comply with. Many nursing facilities have, or are in danger of losing their VA contracts, placing veterans at risk to lose quality care.

While awaiting an official memo from VA Central Office to, hopefully, rescind the IT security requirement for civilian NFs, AHCA has identified a contact in the VA General Counsel's office who will speak with VA contracting officers, explain that a memo is being drafted, and potentially have the addendum pulled from the contract. If your facility has been told by a VA contracting officer that you must comply with the new VA addendum, please send the following information to Melissa Temkin:

1. The name and location of your facility(s) that have/are in danger of losing VA contracts due to non-compliance with the VA IT security addenda.
2. The name, phone number and e-mail address of the VA contracting officer that you are dealing with.

AHCA has been asked to serve as a conduit between AHCA members and the VA. We will contact your contracting officer and get him/her in touch with the VA General Counsel's office to take further action. We will keep members apprised on this IT security issue, as well as our efforts to have a new VA/NF agreement in place which would rectify IT security, Department of Labor, and other issues that plague current VA/NF contracts. Questions? Contact Melissa Temkin.

Corporate Compliance

AHCA's Summary of Federal Medicare/Medicaid Integrity Programs and Fraud Investigations

There is a tremendous amount of on-going government activity based on Medicare/Medicaid claims review, recoupment and fraud investigations, making it extremely difficult to retain and categorize all of the information. AHCA staff, in an effort to provide a summary of the most important information in these areas, have developed a chart addressing key programs, entities, roles and schedules which we plan to update on an on-going basis. If you have any questions please let us know by contacting Dianne De La Mare for Compliance Programs and Medicaid, Elise Smith for Medicare and Priscilla Shoemaker for Fraud Enforcement, Investigation and Prosecution.

Department of Justice Responds to Letter on False Claims

The Department of Justice has issued a response to a US Chamber of Commerce Coalition (Coalition) letter concerning the investigation of false claims under the *Fraud Enforcement and Recovery Act of 2009 (FERA)*. In July, AHCA/NCAL joined forces

with several organizations, including the American Hospital Association and PhRMA, by signing on to a Coalition letter urging the Department of Justice (DOJ) to begin a formal rulemaking process to establish fair guidelines on prosecutors' ability to interrogate corporate witnesses and to specify the circumstances in which investigative information will be shared with third parties. The response from Assistant Attorney General Tony West states that DOJ does not see a need for the Department to issue formal regulations, and that they are taking into consideration addressing the Coalition's concerns by either issuing internal guidelines, through the Department's review of individual cases, or through training of Department officials. The Chamber and AHCA/NCAL will continue to monitor and work with DOJ on this issue. For more information please contact Teresa Cagnolatti.

Compliance Tip of the Month – Understanding The Law

Over the last year, we've provided compliance tips highlighting the "mechanics" of setting up a compliance program. Establishing these essential procedures and systems is only the first step to creating an effective compliance program in your facility. The second step is identifying all the applicable federal laws with which nursing facilities must comply and ensuring that the mechanics of the compliance program are designed to reflect, monitor and ensure compliance of these laws, such as: Anti-Kickback law, resident safety, Health Insurance Portability and Accountability Act (HIPAA), reserved bed payments, sufficient staffing, proper reporting of case mix, appropriate use of psychotropic medications, comprehensive care plans, restorative care services, medication management, physician self-referrals, anti-supplementation and therapy services. Questions? Go to AHCA/NCAL compliance website or contact Dianne De La Mare.

MSIS Data Usefulness for Detecting Fraud/Abuse Flawed

The Office of Inspector General (OIG) has released a report on the Medicaid Statistical Information System (MSIS) data from FY 2004-2006, which is the only source of nationwide Medicaid claims and eligibility information. CMS collects MSIS data directly from the States to, among other things, assist in detecting fraud, waste and abuse in the Medicaid program. The report indicated that MSIS data was on an average, one and a half years old when it was finally released to all end-users. CMS did not fully disclose or document information about the accuracy of MSIS data. The MSIS did not capture many of the data elements that can actually assist in fraud/abuse detection. The OIG recommended that both the States and CMS do a better job to reduce the timeframes for file submission and validation; improve the documentation and disclosure of error tolerance adjustments and expand current State Medicaid data collection and reporting. Questions? Click to contact Dianne De La Mare.

Events

AHCA/NCAL Annual Meeting - October 4-7, 2009

Join AHCA/NCAL at the 60th Annual Quality Care Plus Convention and Expo, October 4-7, 2009 at



Chicago's McCormick Place. Our keynote speaker is Major League Baseball Hall of Famer Cal Ripken, Jr., who will share his insight on *The Keys to Perseverance*. LTC practitioners will benefit from over 60 specialized educational forums, including a **Not for Profit track**, be inspired and energized by dynamic speakers, and become more knowledgeable about the latest products and services from hundreds of exhibitors.

We are also holding our first **“Not for Profit Board and Leadership Training”** event on Sunday, October 4 from 1-5pm. This is an ideal session for NFP Board members, executive and managerial staff, and other professionals interested in learning about NFPs' responsibilities to document community benefit and navigate the new IRS 990 form, as well as other integral aspects of operating a NFP facility. Julie Trocchio from the Catholic Health Association and Ann Tettlebaum, CPA from Williams-Keepers will be presenters.

In addition, for the second year, AHCA will hold a **NFP Reception** the evening of Tuesday, October 6. This is a great opportunity for NFPs to network and get to know each other.

For more information, check the AHCA/NCAL web-site by clicking on the “Events” tab.

AHCA's Inaugural NFP Program Award Winner is Announced!

Heritage Inn of Barnesville is being honored as the inaugural NFP Community Benefit Program honoree for its support of the Community Health Foundation and Community Health Systems. In addition to serving the community by helping disadvantaged individuals maintain electricity in their homes, providing shelter, and alleviating accessibility issues for handicapped individuals, Heritage Inn also strongly supports and assists its own employees and family members in times of need. For example, Alma Ball's granddaughter was a Heritage Inn employee and was tragically killed during a non-work related event. In conjunction with the Community Heritage Foundation, Heritage Inn enlarged Alma Ball's small house so that she could take care of her three great grandchildren.

Located in Barnesville, Georgia, Heritage Inn is a member of the Georgia Health Facilities Association. Julia Ann Ridgeway is the facility administrator and Roxanne Galloway is Regional Vice-President.

Mark Your Calendars for the 2010 AHCA/NCAL Quality Symposium

Mark your calendars and make plans to attend the AHCA/NCAL Quality Symposium, February 9-10, in Baltimore, Maryland. Attendees can choose from 20 sessions that represent a wide spectrum of programming for beginners and advanced practitioners. This “must-attend” symposium is ideal for CEOs, Owners, Administrators, and long term care professionals in DD facilities who are dedicated to performance excellence. Thirteen CEUs are available for this event. Registration and comprehensive information will be available in October.



Flu Facts

IOM Recommends N95 Respirators to Protect Healthcare Workers from H1N1 Influenza

The Institute of Medicine (IOM) released its recommendation that health care workers who interact with patients suspected or confirmed to be infected with novel H1N1 influenza A should wear N95 respirators. IOM emphasized several times throughout its Letter Report—Respiratory Protection for Healthcare Workers in the Workplace Against Novel H1N1 Influenza A the importance of also utilizing other infection control strategies. IOM was asked to evaluate personal protective equipment (PPE) designed to guard against respiratory infection specifically. Therefore, the IOM committee focused solely on the efficacy of medical masks and respirators. IOM did not consider economic and logistical considerations nor did they consider other variables, such as whether healthcare workers are effectively immunized with the H1N1 vaccine.

IOM found a paucity of studies comparing the clinical effectiveness of respirators versus medical masks in preventing the transmission of influenza viruses. Noting that the need for research is striking, they also recommended an increase in research on influenza transmission and personal respiratory protection. To view a brief of the report, please click [here](#). See AHCA's H1N1 Update No. 24 for more information.

New Flu Guidance for Businesses

Recently, Department of Commerce Secretary Gary Locke, HHS Secretary Kathleen Sebelius, and Homeland Security Secretary Janet Napolitano announced new guidance for businesses to plan for and respond to the upcoming flu season. The guidance, released by the Centers for Disease Control & Prevention (CDC), is designed to help employers prepare now for the impact that seasonal and 2009 H1N1 influenza could have this fall and winter on their employers and operations.

According to the CDC guidance, employers' plans should address such points as encouraging employees with flu-like symptoms or illness to stay home, operating with reduced staffing, and possibly having employees who are at higher risk of serious medical complications from infection work from home. There are many actions that can be taken to help reduce the spread of flu. The guidance notes the importance of using these actions, including regular and frequent hand washing and routine cleaning of commonly touched surfaces.

For more information, including a communication toolkit for businesses and employers, visit the federal government's dedicated influenza site at www.flu.gov.

H1N1 Vaccination Resources

As states and local governments are in the process of developing their plans to distribute H1N1 vaccine, AHCA/NCAL encourages providers check in with their local and state public health departments now to alert the agencies to their H1N1 vaccine needs. Health care workers, including LTC, are one of the five groups targeted for vaccine as soon as

the vaccine is available. According to the CDC's Advisory Committee on Immunization Practices (ACIP) recommendations, residents over 65 are **not** eligible for the vaccine.

Information about vaccine manufacturers and distributors with vaccine available for purchase can be found on the [Influenza Vaccine Availability Tracking System website](#). Providers or anyone seeking to locate a flu clinic in their area for administration of the seasonal flu vaccine may click [here](#).

Currently, the federal government estimates that 45 – 52 million doses of the vaccine will be available in mid-October, and then up to 195 million doses will be available weekly. The vaccine will be shipped to clinics, offices, health departments and other project area-designated sites via centralized distribution. There is no charge for the vaccine, needles, syringes, sharps containers and alcohol swabs as they are being provided by the federal government. The CDC has reported that providers looking to order additional seasonal flu vaccine are encouraged to use the supplies that they have now and continue to look for additional vaccine for purchase in the coming weeks. For more information, view the CDC [Q&As](#) and [AHCA's memo](#).

For more information visit [AHCA/NCAL's H1N1 Update Page](#).

CMS Issues Pandemic Policies and Procedures

CMS has begun to issue emergency policies and procedures that may be used in the event of a pandemic flu. These policies and procedures are found on [CMS web page](#), which is designed to provide up-to-date information for Medicare and Medicaid providers.

Assisted Living

Assisted Living Steady Through 2008, Report Says

Assisted living residences generally remained healthy despite the economic recession during 2008, outperforming other seniors housing sectors in two key financial indicator categories—net operating income and occupancy, says the recently released “The State of Seniors Housing 2009” report.

The median net operating income per occupied unit was highest for assisted living (\$14,060), compared with not-for-profit continuing care retirement communities (CCRCs) at \$9,342, and for profit CCRCs at \$8,331. The total median annual occupancy by level of care and region for assisted living beds was 92.6 percent and operating margin was 33.7 percent, says the report.

NCAL is a major sponsor of the report published by the American Seniors Housing Association. To read more about the report, see the September edition of NCAL's *Focus*.

OSHA News

AHCA Meets with OSHA on Ergonomics

AHCA, members of the Loss Prevention Forum, and Brad Hammock from Jackson Lewis, LLP recently met with officials at OSHA. The meeting focused on the fact that

due to the diverse resident population in long term care, a potential “one-size” ergonomics standard will not work. In addition, long term care already focuses on ergonomics in our current regulatory structure, including in citation F323 “Accidents” in the CMS NF survey; OSHA’s current focus on ergonomics and slips, trips and falls during long term care facility inspections; and in life safety code issues for storing lifts. AHCA stressed to OSHA that if it writes ergonomics guidance/a standard in the future, we want to be at the table. For more information, contact Melissa Temkin.

OSHA Final Rule: Updating PPE Standards Based on National Consensus Standards

OSHA has issued a final rule, effective October 9, to update the references in its regulations for personal protective equipment (PPE) for eye-and face-protective devices, and head and foot protection for general industry (which includes LTC) as well as some other industries. The rule essentially:

- States that employers may use PPE constructed in accordance with any of the three most recent (post-1986) national consensus standards (from the American National Standards Institute [ANSI] or the American Society for Testing and Materials [ASTM]); or
- The employers can use PPE not manufactured in accordance with one of the national consensus standards when the employers can demonstrate that its PPE provides employee protection that is *at least as effective* as the PPE constructed in accordance with the appropriate national consensus standard(s) that are listed in the regulation.
- In addition, the Agency will use appropriate rulemaking, including direct-final rulemaking, to incorporate new consensus editions into the regulation and to remove outdated editions from the regulatory text.

We believe that OSHA’s intent with the rule is not to require any changes in how employers use PPE; on the contrary, the intent is to broaden the PPE that employers are allowed to use. ANSI and ASTM standards can be found at www.ansi.org and www.astm.org respectively.

The rule can be viewed at <http://edocket.access.gpo.gov/2009/pdf/E9-21360.pdf>.

Clinical Corner

Coalition Responds to DEA “Dear Practitioner” Letter

The Drug Enforcement Administration (DEA) Stakeholder group, the Quality Care Coalition for Patients in Pain, recently responded to the recent DEA “Dear Practitioner” letter. The DEA released the letter in early August after urging from the coalition and Senator Whitehouse (D-RI), a member of the Judiciary Committee. The coalition had hoped that the DEA’s letter would address provider concerns, raised at an April meeting with the Agency, related to Controlled Substances Act (CSA) language that when followed, negatively impacts the timely release of non-emergency controlled substances to patients and does not recognize the long term care nurse as the agent of the

practitioner. Instead, The DEA letter only addressed the use of verbal orders during emergency situation that involve Schedule II medications.

The coalition's response points out the recent changes in the Agency's historic treatment of long term care pharmacies and treatment of the relationship between practitioners and nurses in long term care, and asked for clear guidance on a number of unanswered questions. The coalition is hopeful that the DEA will respond quickly to the questions. For more information, please contact [Sandra Fitzler](#).

CDC to Distribute Funds to Fight Healthcare-Associated Infections

The CDC has [announced](#) distribution of \$40 Million in Recovery Act Funding to help states fight healthcare-associated infections (HAIs). Funding for HAI efforts will focus on HHS priority targets such as bloodstream infections, surgical site infections and catheter-associated urinary tract infections, and will address pathogens such as methicillin-resistant Staphylococcus aureus (MRSA) and Clostridium difficile (C. diff).

The HHS action plan includes five-year national prevention targets to reduce and prevent infections. One of the HHS plan goals is to collaborate effectively with public and private sector partners to accomplish the large-scale prevention of HAIs. CMS will use \$10 million to improve the process and frequency of inspections for ambulatory surgical centers, while CDC will allocate \$40 million to states to create or expand state-based HAI prevention collaboration efforts. Questions? Click to contact [Sandra Fitzler](#).

OIG Update

OIG Releases Updated Exclusions List - Be Sure To Check It Out!

The OIG posts a monthly update to its List of Excluded Individuals/Entities (LEIE,) identifying individuals and entities excluded from participation in any Federal health care program. The [updated LEIE](#) contains a list of all exclusions currently in effect. LTC providers should routinely check the OIG's LEIE as Federal law prohibits providers from employing or contracting with any individual or entity who is excluded from participation in Federal health care programs (e.g., Medicare/Medicaid) for the provision of items or services for which payment may be made by those programs. A provider who employs or contracts with an excluded individual or entity in violation of the law is subject to the imposition of a civil monetary penalty by the OIG. [Instructions](#) for accessing either format can be found on the OIG website [here](#). Questions? Listen to the OIG explain the LEIE at the archived Compliance Program Webinar [here](#).

Webinars and Resources

Fourth Anniversary of Hurricane Katrina Reminds Us To Be Prepared For All Disasters

As the fourth anniversary of Hurricane Katrina is upon us, now is a good time to review lessons learned and update disaster plans to ensure that LTC facilities are prepared for disasters of any kind. AHCA recently hosted a successful webinar, [*Disaster Preparedness After Katrina—Are Long Term Care Facilities Better Prepared? Can We*](#)

Avoid Traumatic Court Experiences?, presented by *Watered Down Truth* author, Robert Abrams; defense attorney, Jim Cobb; Joe Donchess, Executive Director of the Louisiana Health Care Association; Jocelyn Montgomery, Director of Clinical Affairs of the California Association of Health Facilities; and Janice Zalen, AHCA Senior Director of Special Programs. The Webinar provided important aspects of disaster planning, and encouraged facilities to ensure they are prepared. To view this webinar, and the information included in it, please click [here](#).

Additional webinars on other topics can be found [here](#).

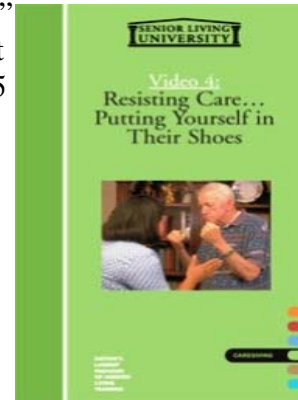
Teach Staff To Interact With Residents That Have Alzheimer's Disease Safely

This video titled, “Resisting Care...Putting Yourself in their Shoes” is the perfect guide to responding safely and effectively to resident resistance with compassion and quality care. The video is about 15 minutes long and was produced by Senior Living University.

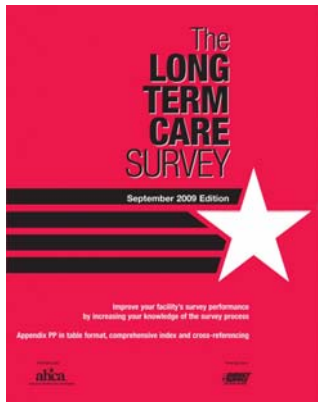
Please note that if this item is on backorder, the product is printed/produced “on a demand” basis. You may place your order for this item and it will be shipped as soon as it is produced.

To order call NCAL’s Bookstore at (800) 321-0343 and ask for product code No: 6937D, or [click here](#).

The cost for members is \$80.00 and for nonmembers the cost is \$95.



Order Your Updated Edition of AHCA’s LTC Survey Now



The new edition of the LTC survey manual can be ordered now at 800-321-0343 or at www.ahcapublications.org. The new product number is 67750909.

This edition contains two sets of changes: the first set, effective June 17, concerns various Quality of Life and Environment (culture change) language in a variety of F-tags. Also, F255, closets, was deleted and the content moved to F461. The second set of changes was effective September 30. F442, 443, 444, and 445 are all deleted and the material moved to F441. More than 40 pages of new guidance have been added to F441, Infection Control. The table of contents and index has been updated to include the new material.

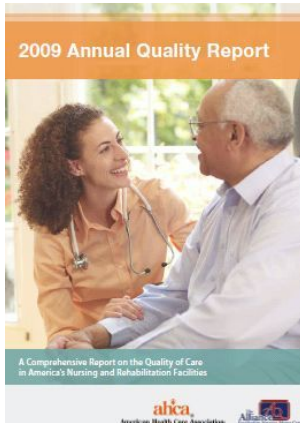
Need A Tool To Help Identify Operational Issues & Improve Performance?

Come learn more about LTC Trend Tracker TM at the AHCA/NCAL 60th Annual Convention. This web-based tool enables staff and facility owners to proactively analyze and evaluate facility operations, track vital market trends, and make



informed strategic operational decisions. Don't miss out on this performance improvement tool that your peers are using. To learn more, visit the LTC Trend Tracker™ team at the AHCA/NCAL 60th Annual Convention and Expo in Chicago, or go to www.LTCTrendTracker.com.

AHCA & Alliance Releases First Of Its Kind Quality Report



We are proud to announce that AHCA, in conjunction with the Alliance for Quality Nursing Home Care (Alliance) is releasing the sector's first comprehensive report outlining quality trends in the nation's nursing homes, the positive evolution of nursing and rehabilitation facilities and the subsequent benefit to cost-effective seniors' care, consumer and workforce satisfaction results, and other key quantifiable measures of quality. The two organizations took the lead in providing true transparency as to the state of quality in America's nursing homes in releasing this report. We engaged experts in quality and nursing facility care to critically assess data and trend to provide an unbiased objective view of Quality since we began *Quality First* in 2002. The final report also features an academic white paper entitled "Changes in the Quality of Nursing Homes in the US: A Review and Data Update" by the highly esteemed Vince Mor, PhD. For a copy of the report, please click [here](#). Questions? Click to contact [Susan Feeney](#).

Stimulus Package Injects New Funding Into Loan Program for Rural Communities

Certain rural assisted living and nursing home providers are eligible to apply for loans targeted at rural facilities funded under the *American Recovery and Reinvestment Act of 2009*. The recovery act includes \$1.14 billion in direct loan funds and \$61 million in grant funds for the Community Facilities Program administered by the U.S. Department of Agriculture (USDA). In order to qualify for a loan, a provider must meet both USDA regulations and recovery act specifications. Applications and inquiries should be made through local offices listed in the Federal Register, [click here](#).

Among other things, a provider has to serve a rural area, be non-profit, and be an essential community facility in order to qualify. According to the USDA, assisted living and nursing home loans made under the longstanding program are usually used for construction, expansion, and renovation. Questions? Click to contact [Melissa Temkin](#).

New Life Safety Code Resource Now Available

The publication, Fire, Building, and Life Safety Code Documentation is now available from AHCA. This guide is intended to help administrators and maintenance directors develop a system to organize all the documents necessary to comply with various Life & Safety Code requirements. It was developed in partnership with Care Providers of Minnesota. The publication is product #8127 and is \$45 for AHCA members, \$75 for non-members. Call 800-321-0343 or go to www.ahcapublications.org to order your copy now!

