

## Tips for a Successful IDR

1. Know the detail as it unfolds and document surveyor comments, discussion and staff interviews as they occur.
2. During the survey, pull out all the stops. Research continually to avoid the tag completely
3. Start the IDR process while the surveyors are in the facility
4. Make copies of policies, procedures, nurses' notes, and any other supportive documentation as well as everything that was given to the surveyors.
5. Talk with the staff and get the facts. Start obtaining their statements while it is fresh in their memory. Don't forget to use affidavits.
6. Review the interpretive guideline for the deficiency to gain an understanding of the intent of the regulation and what questions need to be asked of the surveyors.
7. Use the actual verbiage in the interpretive guidelines to make your argument stronger. This will also be used in the summary/conclusion section of the IDR.
8. Discuss all information with your attorney for feedback and assistance. He/she may have other information that can be included to build your case. They can also provide the legal language that will strengthen the argument put forth in the IDR.
9. Brainstorm your thoughts and write them down.
  - a. Why is the allegation inaccurate, misleading, or completely without merit?
  - b. Make a list of what is needed to support the case (Progress notes, nurses' notes, therapy notes, MDS, etc.)
  - c. Interview involved staff or anyone who witnessed what is being cited or was questioned during the survey as to questions asked by the surveyors and questions answered by staff.
  - d. Depending on the deficiency, you may want to compile research materials to support your position, identify or defend standards of care, etc. Peer reviewed research articles or journal articles from reputable sources, CDC, Advancing Excellence, state QIOs can and should be used if they strengthen your case.
10. Remember to always PROOF READ!! Do not rely on spellcheck only.
11. Send to others for review and feedback—additional review yields a better IDR request.
12. Have your attorney add the legal language regarding why the facility has met the intent of the regulation.
13. Make sure the exhibit numbers are correct. Document them on the upper right hand corner of the exhibit as well as highlight the pertinent information. You can block out information that is not relevant to the IDR. If using the same exhibit more than once, use the same number throughout the document.

14. Place the IDR and exhibits in a binder with the exhibits behind the IDR and a corresponding numbered tab for each one.
15. Have the physician and/or Medical Director review the information and write a letter in support of the IDR.
16. Make sure that you send the information to the appropriate agency timely:
  - a. Standard IDR
    - i. Division of Nursing Care Facilities  
Room 526 Health & Welfare Bldg.  
625 Forster Street  
Harrisburg, PA 17120-0701
  - b. State IIDR
    - i. Quality Insights of Pennsylvania  
2601 Market Place Street  
Harrisburg, PA 17110  
Attn: Vicki Deacon  
(Fax – 717-671-0477)  
With a copy of the cover letter to the appropriate DOH Division:
      - Susan Williamson, Director  
Division of Nursing Care Facilities  
Room 526 Health & Welfare Bldg.  
625 Forster Street  
Harrisburg, PA 17120-0701  
(E-mail – [suswilliam@pa.gov](mailto:suswilliam@pa.gov))
    - Or
      - Charles Schlegel, Director  
Division of Safety Inspection  
2150 Herr Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17103  
(E-mail – [cschlegel@pa.gov](mailto:cschlegel@pa.gov))
  - c. Federal IIDR
    - i. Susan Williamson, Director  
Division of Nursing Care Facilities  
Room 526 Health & Welfare Bldg.  
625 Forster Street  
Harrisburg, PA 17120-0701  
(E-mail – [suswilliam@pa.gov](mailto:suswilliam@pa.gov))

17. GOOD LUCK!!