

## Quality of Life

### Introduction

- The 1987 federal Nursing Home Reform Law clearly recognizes Quality of Life (QOL) as an integral and essential component of an individual’s overall well-being.
- The [federal regulations for nursing homes](#) reflect this importance, stating explicitly that “[q]uality of life is a fundamental principle that applies to all care and services provided to facility residents. Each resident must receive, and the facility must provide the necessary care and services to attain or maintain the highest practicable physical, mental, and psychosocial well-being, consistent with the resident’s comprehensive assessment and plan of care.”<sup>28</sup>
- The CMS guidance makes clear the intent of this requirement:

*The intent of this requirement is to specify the facility’s responsibility to create and sustain an environment that humanizes and individualizes each resident’s quality of life by:*

- Ensuring all staff, across all shifts and departments, understand the principles of quality of life, and honor and support these principles for each resident; and
- Ensuring that the care and services provided are person-centered, and honor and support each resident’s preferences, choices, values, and beliefs.<sup>29</sup>
- The COVID-19 pandemic exposed both the importance of QOL to resident well-being and the extent to which the nursing home industry was unprepared to meet their needs when visitation was stopped. According to an assessment conducted for The Associated Press, “for every two COVID-19 victims in long-term care, there is another who died prematurely of other causes.”<sup>30</sup>
- This section contains state and regional data on QOL citations (F675), including key findings, a map data visualization, and tables.

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<sup>28</sup> 42 CFR 483.24. Available at <https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-G/part-483#483.24>.

<sup>29</sup> CMS State Operations Manual, Appendix PP - Guidance to Surveyors for Long Term Care Facilities (Rev. 173, 11-22-17). For more information, see [LTCCC’s Fact Sheet: Dignity & Quality of Life Standards](#) and other resources on the federal guidelines in the [Learning Center](#) at [www.nursinghome411.org/](http://www.nursinghome411.org/).

<sup>30</sup> Sedensky, Matt and Condon, Bernard, “Not just COVID: Nursing home neglect deaths surge in shadows” (Nov 19, 2020). Available at <https://apnews.com/article/nursing-homes-neglect-death-surge-3b74a2202140c5a6b5cf05cdf0ea4f32>.

## Key Findings

- Quality of Life (F675) citations are rare, accounting for one-tenth of one percent (0.1%) of all citations in the three years we analyzed. **Nationwide, the failure to meet a resident’s quality of life needs and rights was cited by surveyors at an annual rate of only 0.8 for every 10,000 residents.**
- Of the 330 QOL citations reported nationwide from 2018-20, only 22 (6.7%) were categorized as Harm (G+). **In most states, surveyors never identified a single instance in which a resident suffered harm because of a QOL violation** during the three-year period assessed.
- Annual QOL citation rates exceeded 2 per 10k residents in only four states: Alaska, California, DC, and Montana (see *Figure 15*).
- Though citations for violating residents’ rights to a decent quality of life were miniscule nationwide, variations among the CMS Regions were found. Region 9 (AZ, CA, HI, NV) had the highest annual QOL citation rate (2.1 per 10k residents); Region 2 (NJ, NY, PR) had the lowest, with a rate (0.2 per 10k residents), roughly one-tenth that of Region 9.
- These data indicate a profound disconnect between the regulatory requirements for resident quality of life – including treatment with dignity and humanity – and their enforcement. The federal guidelines state that specific principles of quality of life “will be used for determining whether a resident’s quality of life is being supported and or enhanced” by a nursing home and its staff. Yet, as our findings indicate, citations are exceedingly rare.
- **This problem may be due, at least in part, to the CMS guidance being self-contradictory.** Though the requirements and their intent (as discussed in the above introduction) clearly mandate a resident-centered approach that fosters dignity, choice, and self-determination, the guidance also states that “[n]oncompliance at F675 identifies outcomes which rise to the level of immediate jeopardy and reflect an environment of pervasive disregard for the quality of life of the facility’s residents.” As discussed throughout this report, federal data show that surveyors are extremely disinclined to cite a facility at the level of Immediate Jeopardy (IJ). Thus, stating that a problem should be “pervasive” and rise to the level of IJ sends a message that undermines the implementation of these important standards in the lives of residents. [Though, as discussed above, less than seven percent (7%) of QOL citations are cited at a level of harm or higher, indicating that surveyors are not understanding or correctly implementing the guidance.] **We strongly recommend that CMS resolve this conflict and take immediate, meaningful steps to ensure that surveyors are effectively enforcing quality of life requirements.**

### Don’t you know that it’s toxic: A “No Harm” Quality of Life Deficiency (F675)

At a California nursing home, staff failed to monitor a resident’s medication serum levels. Though the resident was put at greater risk of drug toxicity and symptoms such as muscle weakness, twitching, blurred vision, confusion, and dehydration, the violation was not cited as causing harm or immediate jeopardy.

Data: Map and Tables

Quality of Life Citation Rate by State (2018-20)

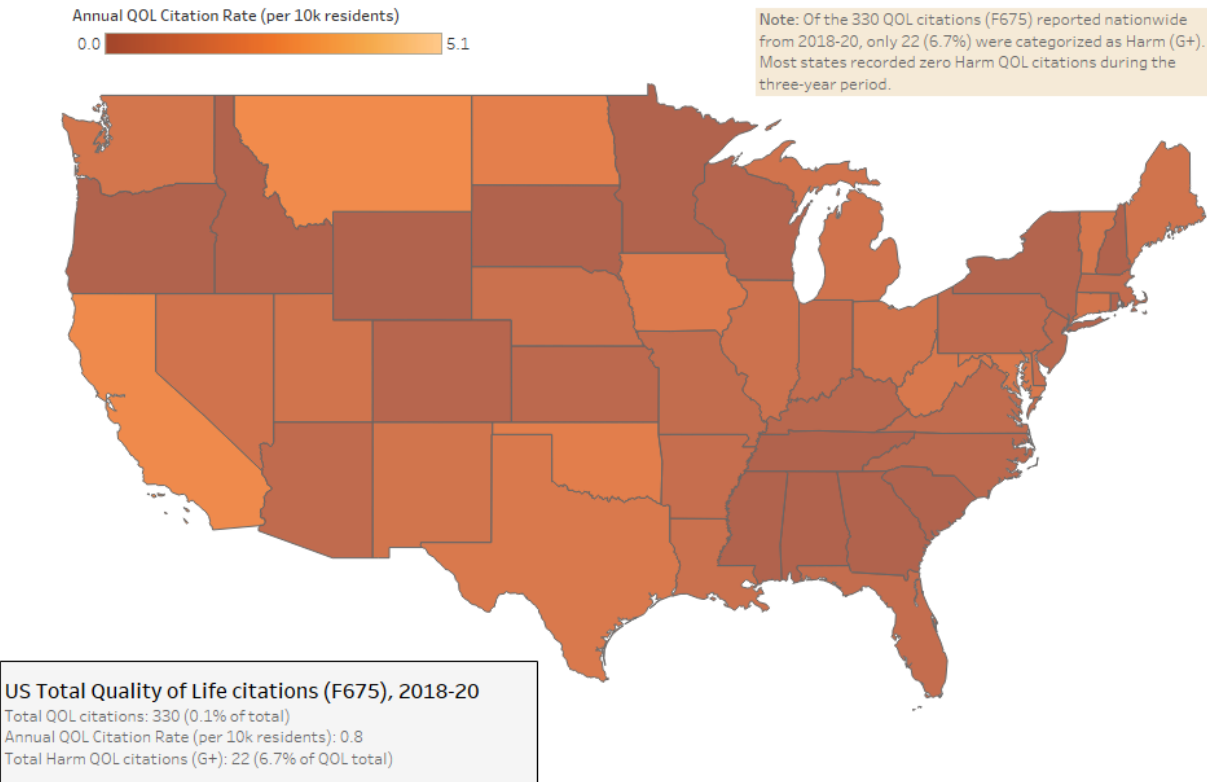


Figure 14: Annual Quality of Life citations (F675) per 10k residents during the three-year period from 2018-20. Darker shades indicate lower QOL citation rates. See Figure 15 for info on Alaska, Hawaii, and Puerto Rico.

## Broken Promises: An Assessment of Federal Data on Nursing Home Oversight

	Quality of Life Citations (F675)	QOL Rate (per 10k residents)	Rank: QOL Rate	Harm (G+) QOL	% Harm (G+) QOL	Rank: % Harm (G+) QOL
AK	1	15.3	1	0	0.0%	15
AL	0	0.0	39	0		
AR	4	2.3	24	0	0.0%	15
AZ	2	1.6	30	0	0.0%	15
CA	76	7.4	4	1	1.3%	14
CO	1	0.6	36	0	0.0%	15
CT	8	3.7	13	1	12.5%	10
DC	2	8.6	2	0	0.0%	15
DE	1	2.5	23	0	0.0%	15
FL	15	2.0	25	2	13.3%	9
GA	0	0.0	39	0		
HI	0	0.0	39	0		
IA	11	4.8	7	2	18.2%	6
ID	0	0.0	39	0		
IL	20	3.1	20	1	5.0%	13
IN	7	1.8	28	0	0.0%	15
KS	2	1.2	32	1	50.0%	2
KY	2	0.9	35	0	0.0%	15
LA	7	2.7	21	0	0.0%	15
MA	7	1.9	27	1	14.3%	8
MD	11	4.6	8	0	0.0%	15
ME	2	3.4	17	0	0.0%	15
MI	13	3.4	18	2	15.4%	7
MN	0	0.0	39	0		
MO	7	1.9	26	0	0.0%	15
MS	0	0.0	39	0		
MT	3	7.6	3	2	66.7%	1
NC	4	1.1	34	0	0.0%	15
ND	3	5.7	5	0	0.0%	15
NE	3	2.7	22	0	0.0%	15
NH	0	0.0	39	0		
NJ	5	1.2	33	0	0.0%	15
NM	2	3.6	14	1	50.0%	2
NV	2	3.4	19	0	0.0%	15
NY	2	0.2	38	0	0.0%	15
OH	25	3.5	16	0	0.0%	15
OK	10	5.5	6	1	10.0%	11
OR	0	0.0	39	0		
PA	11	1.5	31	0	0.0%	15
PR	0	0.0	39	0		
RI	0	0.0	39	0		
SC	0	0.0	39	0		
SD	0	0.0	39	0		
TN	0	0.0	39	0		
TX	42	4.5	9	4	9.5%	12
UT	2	3.5	15	0	0.0%	15
VA	5	1.8	29	1	20.0%	5
VT	1	4.1	11	0	0.0%	15
WA	6	3.8	12	2	33.3%	4
WI	1	0.4	37	0	0.0%	15
WV	4	4.3	10	0	0.0%	15
WY	0	0.0	39	0		

Note: States that failed to record QOL citations (F675) during the three-year period are not ranked in % Harm. Most states recorded zero Harm QOL citations during the three-year period.

Figure 4: Quality of Life (F675) citation rate and severity by state (2018-20).

	Quality of Life Citations (F675)	Annual QOL Rate (per 10k residents)	Rank: QOL Rate	Harm (G+) QOL	% Harm (G+) QOL	Rank: % Harm (G+) QOL
Region 1	18	0.74	8	2	11.1%	4
Region 2	7	0.16	10	0	0.0%	10
Region 3	34	0.80	6	1	2.9%	8
Region 4	21	0.28	9	2	9.5%	5
Region 5	66	0.84	4	3	4.5%	7
Region 6	65	1.37	2	6	9.2%	6
Region 7	23	0.87	3	3	13.0%	3
Region 8	9	0.76	7	2	22.2%	2
Region 9	80	2.14	1	1	1.3%	9
Region 10	7	0.84	5	2	28.6%	1



**Sources:**  
 CMS Health Deficiencies (Downloaded March 2021; excludes surveys before 2018 and after 2021).  
 MDS 3.0 Frequency Reports (2018-20). See "Identi.."

**Notes:**  
 Quality of Life citations (F675) per 10k residents from 2018-20.  
 Harm: citation rated G or above.  
 Immediate Jeopardy (IJ): citation rated J or above.



Figure 5: Quality of Life citation (F675) rate and severity by region (2018-20).

Interactive charts and maps are available at <https://nursinghome411.org/survey-data-report/>.