

GUARDIANS OF NORMAL LIFE

**How Activity/Recreation/Engagement/Community Life
Professionals can Save the World of LTC**



**carmen bowman, activity professional turned surveyor, regulator turned educator,
encourager, coach, teacher & builder of an army of guardians of normal life**

GUARDIANS OF NORMAL LIFE: How Activity/Rec/Engagement/Community Life Professionals can Save the World of LTC
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A Call to Advocate - Whoever you are -Wherever you find yourself.

Calling all who care about what life could be like living in a nursing home or assisted living heretofore referred to as LTC (long-term care) homes. Did you know, living in a LTC home *could be* terrific? Regulations do not hold us back. Please join me in really learning what regulations say *and what they do not say* – for it is in that we have freedom.

Knowing federal and state regulations is foundational to you as a professional. Do you know them? If you work in a LTC home, you are held accountable to them. Surveyors hold you to them when they are in the home you represent conducting a survey. If a surveyor said something that didn't match up with requirements, would you know? Surveyors are to survey according to regulation, not their opinion. Would you know how to point to what the regulations state and what they do not state? Would you discern surveyor or anyone else's opinion from regulation? Do you know what is only common institutional practice versus what is truly required? There are many myths. I invite you to become a student of non-institutional practices of individualized care and person-directed living, as well as regulations. In knowing both, you can move the mountain of institutional living that nobody wants replacing it with the vista of home we all do want. And if you are a surveyor, this is for you too. We are all desensitized to thinking that institutional living is normal. Me too years ago but it is not. Normal life is what should and could be. We can all reject the institutional model, institutional ways, institutional culture, institutional thinking, all of it. People created it and people can change it. We can reject institutional practices in favor of those that support normal life. Perhaps surprising, this is done within regulations as is.

Notice I'm not speaking of innovation either. No. What is proposed is de-institutionalizing using non-institutional, normal practices to put those who live there above the needs of the institution; honoring home, true home, *not* homelike and *not* facility. Leaders of changing culture say it is commonsense, not innovation. Join many who have transformed systems to support individuals to live life on their own terms. In other words, normal, commonsense living. Common sense is not innovation. Normal life is not innovative, it is normal.

Become a Guardian of Normal Life. Reject the institution/the skilled nursing facility/the care center. Guard normal; safeguard home. Protect and promote real life over any hint of institutional existence. Whatever your role, become an advocate. Become a protector and promoter of the individuals who live there, who sleep there and eat there and spend their days there. Become an advocate for quality of life in whatever role you hold. That will change institutional thinking and culture.

If we each do this, we can make living in any LTC home terrific.

“Institutional creep” dubbed by the Eden AlternativeSM has sadly made its way into assisted living homes as well as even people's own homes from outsider influence. Please be aware of this, learn about it, call it out and reject it.

No one says, FACILITY SWEET FACILITY. Here's to true HOME SWEET HOME.

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This Resource is designed for your whole Team as it is the Team that Makes Change

I am not calling this a book because my hope is for you to really use it. Instead of pages I offer standalone Informative/Info Sheets in hopes you will share it with your wider team.

Most people living, working, and visiting LTC homes don't know it can be different than the institutional ways and practices they live and work and walk in. On most pages I share both regulations and culture change practices. Let them empower you to become a leader. Share them widely with all the stakeholders who care about the LTC home you represent.

If you too get excited about rejecting old, outdated institutional culture, practices, and systems, please encourage others to get this resource. Consider it a tool all can use to become emboldened to finally change what we do. We can. You can. Many others have before you. If they can do it, you can do it. **It is the team is who creates the culture in whatever LTC home you are a part of. Encourage your team, educate your team, grow together, and become famous to do what is in your heart to do. Honor those who live there more than the invisible institutional culture we all seem to bow down to.** Tell students, professors, owners, regulators, ombudsmen, politicians, colleagues in your profession; all have an element of power to make change and together we really could.

CMS Nursing Home Regulations are good – consider using as Standards of Practice

CMS is the Centers for Medicare and Medicaid Services the entity that regulates Certified Medicare and/or Medicare nursing homes. In this tool, federal nursing home regulations will be referred to most often. Obviously, state nursing home regulations would be too much but please know two things about state regulations: 1) They typically reflect federal regulations. There usually are only a few stand-out state requirements different than federal. Just ask a surveyor; they'll know off the top of their head probably. And of course, study them yourself to know. 2) If you represent another setting such as assisted living, independent living, home health, hospice or corrections, please consider using the federal regulations as standards of practice. Many individuals working in these other settings have realized this and use them particularly when there are no other requirements. Please note: CMS regulatory text is italicized, both the regulation and guidance text so you know it is from CMS, any in **bold** is my emphasis.

Join me in Replacing Institutional Language as we Go

I cannot use the old, institutional language so be aware I will use normal language and invite you to do so as well. Language has power and language drives practice. Also, it costs no money to change yet does wonders to reorient all of us to normal life. Please consider **Using Language to Replace Institution with Normal Life** as another eResource.

Go get the very helpful resource [The Artifacts of Culture Change - Nursing Homes](#) and/or [The Artifacts of Culture Change - Assisted Living](#) – both are free.

CMS funded the original in 2006. A Civil Monetary Penalty reinvestment project funded the 2.0 version and first-ever Artifacts for Assisted Living in 2021. This eResource depicts recognized culture change practices and reference pertinent Artifact items as they come up.

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Do the Music Math/Music = Health: We call ourselves *Healthcare*
Music is more than a “non-pharmacological intervention” - Music is Meaningful
Meaningfully Engage People – in their Rooms, on their Person, everywhere they Look
Magazines provide Meaningful Engagement, Mail and Normalcy
Take Advantage of Photo Books, Cards, Family Photos, Newspapers & Easy Reading
Meaningful Items that Naturally Engage – Clocks and Date Clocks
Personally chosen Calendars and Mugs reveal Personality and Engage
Oodles of more Individual Items that Naturally Engage a Person
Guarding Normal Life = Compliance with many CMS Requirements
Since being Outside contributes to Health, Care Plan Preferences for going Outdoors
SUNdowning = Needs SUN; Sunshine improves Sleep
Variety, Spontaneity and Real Life are antidotes to Boredom
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Spontaneous Surprises
Meaningful Engagement can Prevent Distress, Depression, Boredom, Falls and More
Use Normal Language to Guard Normal Life
Keep a Taste for Normal Life: Beware Prescribing and Medicalizing Life
Establish an Expectancy of Engagement/Pledge to Engage/Oath against Boredom
The Pledge to Guard Normal Life
Quality of Life Stands Alone



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Dedicated to my two: my hubby Bo and daughter Ellie - You have been my stalwarts of normal life. I thank both of you and I thank God for you.

Many thanks to Hayley Moseley, EdD, a dedicated guardian of normal life and good English.

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Using Regulations to Reject & Replace Institution with Home and Normal Life Series:

1. Guardians of Normal Life: How Activity/Recreation/Engagement/Community of Life Professionals can save the World of LTC
2. Using Language to Replace Institution with Normal Life
3. Normal applied to Planning
4. Normal applied to Wellbeing – Highest Practicable and the Domains of Wellbeing in CMS Regulations
5. Be Your Own Surveyor – Activities Tag F679/Related Requirements/Survey Pathway
6. Guardians of the Culture: How Administrators can save the World of LTC
7. Guardians of Healthy Life: How Nurses can Save the World of LTC
8. Guardians of Daily Life: How CNAs can Save the World of LTC
9. Guardians of Self-directed Life: How Social Workers/Services can Save the World of LTC
10. Guardians of Normal Eating and Dining: How Dietitians and Food and Nutrition Professionals can Save the World of LTC
11. Guardians of Home: How Environmental Service Professionals can Save the World of LTC
12. Guardians and Gatekeepers of Great Care Plans: How MDS Coordinators can Save the World of LTC
13. Guardians of a Good Life for People with Cognitive Change grounded in Regulation and the Validation Method©
14. Proactive Practices to Prevent Falls by All
15. Artifacts of Culture Change 2.0 Companion eResource

These eResources can be found at Edu-catering.com.

Please join me in becoming a guardian of home and normal life, whoever you are, whatever role you find yourself in.

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Knowing Regulations is Foundational

Do you know the regulations you are held accountable to?

There are many myths out there. Why? Because so many professionals just don't know the requirements of the LTC home they represent. And yet, the process of a survey or inspection is exactly that, a certified or licensed LTC home being held to the regulatory requirements it committed to upholding when it became a certified or licensed entity.

Also, when one does not know the regulations, they are held to, they may be swayed by myth or someone's opinion. However, LTC homes are to be surveyed and operated, not by opinion, but rather regulations. How does one discern someone's opinion from regulation without being knowledgeable about the requirements? With the work of changing institutional culture, this naturally comes up. Here is an example. Many homes have taken the bold move to change care plan tense to the voice of the person. Can they? Yes. When you study Tag 656 Comprehensive Person-Centered Care Plan you will see there is no mention in this regulation about the tense used. However, over the years, some surveyors have simply said during survey they don't like that style of care planning. That is an opinion. And sadly, many organizations, behind the scenes, decide to stop on the spot. You don't have to do that. You never have to do that. Take your time. Be smart and methodical. Study first.

Federal regulations are promulgated by the Center for Medicare and Medicaid Services (CMS). Any nursing home that receives reimbursement from Medicare and/or Medicaid must then comply with these federal requirements to receive payment.

Some types of homes and services may not have requirements, such as non-licensed assisted livings or prisons that serve older people, etc. Even licensed assisted livings or licensed-only/private pay nursing homes tend to be just as institutional. So again, consider the federal regulations as good standards to go by. As you will see, they are good. If you or I lived in a LTC home, we would want them. They have not stood in the way at all to change institutional culture. Regulations aren't in the way; they are *the way* to change institutional culture. Many culture change practices match and are within the federal LTC regulations.

Regulations: They lead the way, they're not in the way.

You can try www.cms.gov. However, I have found it can be difficult to find things quickly. A general internet search usually takes you right there. Use any of the following words but here also is the exact title for the CMS federal regulations for nursing homes: State Operations Manual Appendix PP - Guidance to Surveyors for Long-term Care Facilities.

**Idea: Go get the federal regulations and any others your home is held to.
Keep the links as a favorite and/or download to your computer.**

Always have handy whatever sets of regulations the LTC home you represent is held to.



Dispelling the Pressure to hold so many Group Activities

Question: Where does the pressure to hold group activities come from?

Challenge yourself to answer this question. Is it from your corporation, your administrator, yourself, the people who live in the home where you work, family members, other professionals, regulations, or the profession itself? Whew. That's a lot of potential pressure. I invite you to study and think about this with me and I hope to relieve some of the pressure on you. If your corporation insists on so many group activities per day, maybe you're stuck. However, most corporate policies and procedures do not. If you haven't read them, go do so to take the pressure off from that angle.

Honestly, yes, most of us do want to see a full calendar and lots of people at an activity – administrators, family members, fellow staff, ombudsmen, surveyors, us too. *But* in that moment, who is it all about?

Question: Why do we want to see lots of groups with lots of people attending?

Could it be that in that moment it is all about us? Have you ever noticed some of the things we do are about us, not the people living where we work?

Here is an example. When I was a surveyor, during a nursing home survey I observed someone *take* a person living there, who was one of my sample residents, from her room to a large group activity. Not invited, not even spoken to. She sat there the whole time until someone *took* her back to her room. The sad part? No one engaged with her, and she was unable to engage herself in the *activity*. I realized in the end it was all about the checkmark on the activities participation record that the person had *attended* an activity. It was all about the paperwork. Again, in that moment who was it all about? Maybe about us and our checkmarks on attendance records? I'm not shaming anyone. We've all done it, including me. But we need to think about the sense of all of this. I urge you to do so because it is so freeing from the old, outdated, unappealing, traditional, institutional model.

Question: What would you do if you were the surveyor observing a person taken, not invited, to a big group, also not engaged with, and then taken back to their room?

Could it be that many of us are so institutionalized to think this is good? Do we resign ourselves to thinking *something is better than nothing*? Sometimes we do and it is understandable, but it can also be different. It can also be better.

Question: Is something better than nothing?

It is called conditioned when people come to accept *what is* even though it could be better. Institutional practices are not required; therefore, we don't have to succumb to them. For most of us an institutional mindset has been inherited but we can reject and change it.

Question: If I have power to change institutional culture, am I willing?



Group Activities can never be The End All Be All and are not the Regulatory Focus

Did you know? So many groups per day is *not* a requirement.

The following CMS regulation includes groups but does not require so many per day:

*CMS Tag 679 Activities: The facility must provide, based on the comprehensive assessment and care plan and the **preferences of each resident**, an ongoing program to support residents in their **choice** of activities, both facility-sponsored group and individual activities and independent activities, designed to meet the **interests** of and support the physical, mental, and psychosocial well-being of each resident, encouraging both independence and interaction in the community.*

This one long sentence, this one regulation, says a lot and although it mentions groups you can see that groups are not the focus. Supporting individuals, their choices, their preferences, their interests are to be focused on, not the number of group activities on a calendar.

State regulations for LTC homes also typically do not require a certain number of groups. Know yours. The closest we see typically is certain categories per month as in this example:

THE ACTIVITIES PROGRAM SHALL BE BROAD ENOUGH IN SCOPE TO STIMULATE PARTICIPATION OF ALL RESIDENTS, BUT NO RESIDENT SHALL BE COMPELLED TO PARTICIPATE IN ANY ACTIVITY. **EACH MONTH, ACTIVITIES SHALL INCLUDE AT LEAST ONE FROM EACH OF THE FOLLOWING CATEGORIES:** SOCIAL/RECREATIONAL, INTELLECTUAL, PHYSICAL, SPIRITUAL AND CREATIVE. (Colorado Nursing Home Licensure Chapter 5 Section 11.1 Resident Engagement 2016)

Also, it is somewhat common that state regulations require one evening offering per week along with requirements for engagement offerings during the weekend. But that's about it.

What gets forgotten when groups are the focus are all the good requirements for individualization. The needs, preferences, choices, interests of each individual are to be the focus and this focus on each individual is almost in every regulation.

Good news: federal and state regulations do not usually require certain numbers of groups.

Question: Do you know what your state regulations require regarding groups?

Knowing regulations brings freedom; you know what is required and what is not.

Become knowledgeable, it will strengthen you as a professional. It frees you from myths and others' opinions you may have heard, and thought were required but are not. When anyone, even me, tells you something is required or not allowed, ask them to show you which regulation states that. Don't accept people's opinions without back up as doing so has created the many myths that are *killing quality of life* for those who live there.

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Carmen Bowman is a consultant, trainer, author and owner of *Edu-Catering: Catering Education for Compliance and Culture Change*, turning her former role of regulator into educator. Carmen was a Colorado state surveyor, a policy analyst with CMS Central Office where she taught the national Basic Surveyor Course and the first certified activity professional to be a surveyor, also serving on the four-year CMS panel that developed interpretive guidance to Activities and Qualified Activity Director. As a contractor to CMS, Carmen co-developed the original Artifacts of Culture Change (ACC), the ACC 2.0 – Nursing Homes and first-ever ACC - Assisted Living and facilitated both Creating Home National Symposiums on Culture Change and the Environment, and Culture Change and Food and Dining. Carmen led the Dining Practice Standards task force, the first-ever Surplus Safety Symposium and co-authored *The Power of Language to Create Culture*. Carmen has a Master's in Healthcare Systems and Bachelor's in Social Work. She is a Certified Eden Alternative Associate and Eden Mentor, Certified Validation Worker, Certified Validation Group Practitioner and Certified Validation Presenter. She co-founded the Colorado Culture Change Coalition and co-started the Wyoming Culture Change Coalition. With Action Pact she has hosted [Conversations of Culture Change with Carmen](#) monthly since 2009, all are archived. For [Action Pact](#), she has co-/authored::

- *Quality of Life: The Differences between Deficient, Common & Culture Change Practice*
- *Living Life to the Fullest: A Match Made in OBRA '87*
- *Meaningful Activity Assessment*
- *Lighting the Way: Building Culture Change Coalitions*
- *Regulatory Support for Culture Change*
- *Changing the Culture of Care Planning: A Person- Directed Approach*
- *SOFTEN the Assessment Process and Training DVD*
- *Vibrant Living: Inspirations to Energize Daily Life*
- *Eliminating Alarms and Preventing Falls by Engaging with Life*

Carmen is a Co-Editor in Chief of the [Activities, Adaptations and Aging: Purposeful and Dignified Living for Older Adults](#) international peer-reviewed Q1 journal. We are always looking for reviewers and submitting authors. She taught the MEPAP Activity Professional Training courses, has been honored with the NAAP *Trustee's Award of Excellence* and writes a monthly column for NAAP. She encourages *all* to shift *from* offering traditional, institutional, scheduled, sometimes-fake life to intentionally ensuring normal life.

[Edu-Catering](#) and [Bad Gravity Studios](#) produce teaching videos/documentaries such as:

- [Westward Heights Wyoming Culture Change Nursing Home Video 2023](#)
- [Star Valley Care Center Wyoming Culture Change Nursing Home Video 2023](#)
- [Mission at Castle Rock Wyoming Culture Change Video 2023](#)
- [Life Care of Casper Wyoming Culture Change Video 2023](#)
- [Morning Star Care Center Wyoming Culture Change Video 2023](#)

If you're excited to become a guardian of normal life, call me 303-981-7228 and I'll cheer you on! Also, I have to say looking back on my life, the best quality of life is to have Jesus in your life. May God bless you - and your life - as you advocate for others to live life to the fullest. Carmen

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