



Center for Clinical Standards and Quality/Survey & Certification Group

Admin Info: 14-14-Hospitals

DATE: February 21, 2014

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Patient Safety Initiative (PSI) FY 2014 Pilot Update

Memorandum Summary

- **Survey & Certification (S&C) FY 2014 PSI:** The Centers for Medicare & Medicaid Services (CMS) S&C PSI is continuing in FY 2014 as a pilot using a risk management and education approach with hospitals. The PSI focuses on consistency in the survey process using standardized tools while also assessing hospitals' compliance with the CMS Conditions of Participation (CoP) for quality assessment performance improvement (QAPI), infection control, and discharge planning.
- **Changes for the FY 2014 PSI:** The methodology for hospital selection has been modified. Using prior citation data from State Survey Agency (SA) Federal surveys along with survey results from hospital accrediting organization (AO) surveys, hospitals in each State are listed according to the number of their serious deficiencies. Additionally, any type of hospital may now be selected for survey, including short term acute care, cancer, children's, long term care, psychiatric, and rehabilitation.

Background

In an effort to support CMS's goals of reducing hospital-acquired conditions, including healthcare-associated infections, and reducing preventable readmissions, worksheets were developed for testing by State Survey Agency (SA) surveyors, to promote a consistent and thorough assessment of hospital compliance. The draft surveyor worksheets are used to assess compliance with the hospital CoPs for QAPI, infection control and discharge planning.

Additional history related to the initiative including information regarding the PSI during FY 2012 and FY 2013 was distributed via S&C Memoranda:

- S&C: 12-01-Hospital S&C Focus on Patient Safety and Quality – Draft Surveyor Worksheets
- S&C: 12-32-Hospital PSI Pilot Phase – Revised Draft Surveyor Worksheets
- S&C: 13-03-Hospital PSI FY 2013 Pilot Phase – Revised Draft Surveyor Worksheets

The memos can be downloaded at the following link: <http://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Policy-and-Memos-to-States-and-Regions.html>

FY 2014 PSI

As in FY 2013, SAs have been instructed to select hospitals for survey based on lists distributed to each of the SA survey directors as well as CMS Regional Office (RO) survey and certification non-long term care managers. The previously issued draft FY 2014 Mission and Priority Document identifies in Appendix 5 the required number of PSI surveys to be completed by each SA, based on population and number of hospitals in each state. SAs must complete required PSI surveys by September 15, 2014.

The methodology for hospital selection has been revised and is now based on recent history of non-compliance identified during SA Federal surveys as well as AO surveys. Citation data was obtained from the Certification and Survey Provider Enhanced Reporting (CASPER) system, capturing results from the Automated Survey Processing Environment (ASPEN) and ASPEN Complaint Tracking System (ACTS) from all types of survey activity on both deemed and non-deemed facilities. Results from the last AO full accreditation surveys were obtained from the Accrediting Organization System for Storing User-Reported Experiences (ASSURE). Both condition- and standard-level citations were included in the determination

Hospitals have been ranked according to prior citation data indicating whether there was substantial noncompliance, and highlighting the forty percent of hospitals with the largest number of prior significant citations. Selections of hospitals should be made from highlighted portion of the lists, but substitutions are permitted under certain circumstances. The lists include all types of hospitals: short term acute, cancer, children's, long term care, psychiatric, and rehabilitation. Critical access hospitals (CAHs) are not included as they have different CoPs.

SA surveyors will utilize all three draft surveyor tools for QAPI, infection control and discharge planning on each survey. The worksheets will aid in the assessment of compliance with the CoPs. As in FY 2013, there will be no citations for any identified condition- or standard-level non-compliance. However, if an Immediate Jeopardy is identified, the survey will be removed from the PSI and proceed as a regular survey, following normal enforcement procedures.

The surveyors will report the results to the hospital at the exit conference. Hospitals will be provided with blank worksheets by the survey team, and once the worksheets have been filled out in their entirety and reviewed, a copy of each should be sent to the hospital for their review. Hospitals should be encouraged to use the results and feedback to improve their practices.

Completed worksheets must continue to be submitted electronically to Acumen, the CMS contractor, for data collection and analysis. Similar to the way the pilot was conducted in FY

2013, no Form CMS 2567 will be issued to the hospital, but SAs will be required to complete and upload a Form CMS 2567, including the Form 670 data but without any citations, to the national data base for each pilot survey. A separate 435 specific to PSI must be submitted quarterly for completed PSI surveys. Funding for the PSI is distinct from other S&C survey activity.

PSI Protocol and Frequently Asked Questions Document

Attached to this memo is the revised FY 2014 PSI Protocol and Frequently Asked Questions document providing additional and more detailed information and instructions. All previous versions are hereby superseded.

Any comments or question related to this memorandum or the PSI should be submitted to the following mailbox: pfp.scg@cms.hhs.gov.

Effective Date: Immediately. This policy should be communicated with all survey and certification staff, their managers and the State/Regional Office training coordinators within 30 days of this memorandum.

/s/

Thomas E. Hamilton

Attachment – FY 2014 PSI Pilot Protocol

cc: Survey and Certification Regional Office Management