# **HOSPITAL PATIENT SAFETY INITIATIVE**

### **DRAFT RISK EVALUATION TOOL**

# **Quality Assessment & Performance Improvement (QAPI)**

State Agency Name		
compliance with the QAPI Condition of Participation. Iten with hospital staff. Direct observation of hospital practice can be assessed in any order. Within each Part there may	ns are to be assessed primarily by review of the es plays a lesser role in QAPI compliance assess also be flexibility to change the order in which	ment, but may still be appropriate. The separate Parts
	PART 1 – HOSPITAL CHARACTERISTICS	
1.1 Hospital Name (please print)		
1.2 Address, State and Zip Code (please print)	A	Address
	City State	Zip
1.3 CMS Certification Number (CCN)		
1.4 Date of site visit:		

1.5 Number of State Agency surveyors who participated in th				
1.6 Approximate time spent on site performing this survey (he	ours):			
1.7 Does the hospital participate in Medicare via accredited "	deemed" status?	0	_	
	O American Osteopathic	Association (AOA)/HF	-AP	
	O The Joint Commission (	TJC)		
1.8b If YES, according to the hospital, what was the end date most recent accreditation survey?	of the m m	/	y y y y	

#### PART 3: DATA COLLECTION AND ANALYSIS - QUALITY INDICATOR TRACERS

#### **Instructions for Part #3 Questions:**

Select 3 quality indicators (not patient safety analyses) and trace them answering the following multipart question. Focus on indicators with related QAPI activities or projects. At least one of the indicators must have been in place long enough for most questions to be applicable.

Elements to be Assessed	Indicator #1	Indicator #2	Indicator #3
3.1 Write in indicator selected.			
Indicator selection identified	O 1	O 1	O 1
through:	O 3	O 3	O 3
	O 5	O 5	O 5
3.1.a Can the hospital provide	O YES	O YES	O YES
evidence that each quality indicator	O NO	O NO	O NO
selected is related to improved			
health outcomes? (e.g. based on	0 1	0 1	0 1
QIO, guidelines from a nationally	0 2	0 2	0 2
recognized organization, hospital	0 3	0 3	0 3
specific evidence, peer-reviewed	0 4	0 4	0 4
research, etc.)	O 5	O 5	O 5

PART 3: DATA COLLECTION AND ANALYSIS - QUALITY INDICATOR TRACERS (CONTINUED)

Elements to be Assessed	Indicator #1	Indicator #2	Indicator #3
3.1.b Is the scope of data collection appropriate to the indicator, e.g., an indicator related to labor and	O YES O NO	O YES O NO	O YES O NO
delivery might be appropriate to all areas of that unit and the ED, but indicators related to hand hygiene would require data from multiple parts of the hospital.	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5
3.1.c Is the method (e.g., chart reviews, monthly observations, etc.) and frequency of data collection	O YES O NO	O YES O NO	O YES O NO
specified?	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5
3.1.d Is there evidence that the data are actually collected in the manner	O YES O NO	O YES O NO	O YES O NO
and frequency specified for this indicator? E.g., Is there evidence of late, incomplete, or wrong data collection?	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5

# PART 3: DATA COLLECTION AND ANALYSIS - QUALITY INDICATOR TRACERS (CONTINUED)

Elements to be Assessed	Indicator #1	Indicator #2	Indicator #3
3.1.e If unit staff play a role in data collection, is collection consistent with the specifications for how the data are to be collected?	O YES O NO O N/A O 1	O YES O NO O N/A O 1	O YES O NO O N/A O 1
	O 2	O 2	O 2
	O 3	O 3	O 3
	O 4	O 4	O 4
	O 5	O 5	O 5
3.1.f Are data that have been collected aggregated in accordance with the hospital methodology	O YES	O YES	O YES
	O NO	O NO	O NO
specified for this indicator?	O 1	O 1	O 1
	O 2	O 2	O 2
	O 3	O 3	O 3
	O 4	O 4	O 4
	O 5	O 5	O 5
3.1.g Are the collected data analyzed?	O YES	O YES	O YES
	O NO	O NO	O NO
	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5

PART 3: DATA COLLECTION AND ANALYSIS - QUALITY INDICATOR TRACERS (CONTINUED)

Elements to be Assessed	Indicator #1	Indicator #2	Indicator #3
3.1.h If the indicator is the type that	O YES	O YES	O YES
measures a rate, are rates calculated	O NO	O NO	O NO
for points in time and over time, and	O N/A	O N/A	O N/A
are comparisons made to	O 1	0 1	0 1
performance benchmarks when	O 2	O 2	O 2
available (e.g. established by	O 3	O 3	O 3
nationally recognized organizations)?	O 4	O 4	O 4
organizations)?	O 5	O 5	O 5
3.1.i When feasible, are aggregated	O YES	O YES	O YES
data broken down into subsets that	O NO	O NO	O NO
allow comparison of performance	O N/A	O N/A	O N/A
among hospital units covered by the	O 1	O 1	O 1
indicator? For example, a hand	O 2	O 2	O 2
hygiene indicator should allow	O 3	O 3	O 3
comparison among different	O 4	O 4	O 4
inpatient units.	O 5	O 5	O 5
If an in the second of the sec	handlate a little of the same BOL		

If no to any of 3.1.a through 3.1.i, the hospital would be at risk on a non-PSI, non-pilot survey for a deficiency citation related to 42 CFR 482.21(a)(1), (a)(2), (b)(1), & (b)(3) (Tag A-273)

# PART 3: DATA COLLECTION AND ANALYSIS - QUALITY INDICATOR TRACERS (CONTINUED)

Elements to be Assessed	Indicator #1	Indicator #2	Indicator #3
<ul> <li>3.1.j If the data analysis identified areas needing improvement, is there evidence that the hospital instituted interventions (activities and/or projects) to address them?</li> <li>Check N/A if analysis did not lead to interventions, but the hospital could demonstrate that other areas were of higher priority.</li> <li>Check NO if analysis did not lead to interventions and the hospital could not demonstrate that other improvement activities were of higher priority.</li> </ul>	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5
3.1.k Are interventions evaluated for success?	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5

PART 3: DATA COLLECTION AND ANALYSIS - QUALITY INDICATOR TRACERS (CONTINUED)

Elements to be Assessed	Indicator #1	Indicator #2	Indicator #3
3.1.I If interventions taken were not successful, were new interventions developed?	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5
3.1.m If interventions were successful, did evaluation continue longer to assess if success was sustained?	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5

If no to any of 3.1.j through 3.1.m, the hospital would be at risk on a non-PSI, non-pilot survey for a deficiency citation related to 42 CFR 482.21(b)(2)(ii), (c)(1), & (c)(3) (Tag A-283)

PART 4 - APPLYIN	NG QUALITY IND	DICATOR INFORMATION - ACTIVITIES AND PROJECTS
Elements to be Assessed		Manner of Assessment Code (Enter all that apply) & Surveyor Notes
4.1 Can the hospital provide evidence that its improvement activities focus on areas that are high risk (severity), high volume (incidence or prevalence), or problem-prone?	O YES O NO	O 1 O 2 O 3 O 4 O 5
If no to 4.1, the hospital would be at risk on a non-PS	<u> </u>	vey for a deficiency citation related to 42 CFR 482.21(c)(1)(i) & (ii) (Tag A-283)
4.2 Can the hospital provide evidence that it conducts distinct performance improvement projects?	O YES O NO	O 1 O 2 O 3 O 4 O 5
4.3 Is the number of projects proportional to the scope and complexity of the hospital's services and operations? No fixed ratio is required, but smaller hospitals with a smaller number of distinct services would be expected to have fewer projects than a large hospital with many different services.	O YES O NO	O 1 O 2 O 3 O 4 O 5

# PART 4 - APPLYING QUALITY INDICATOR INFORMATION – ACTIVITIES AND PROJECTS (CONTINUED)

Elements to be Assessed				Manner of Assessment Code (Enter all that apply) & Surveyor Notes
4.4 Does the scope of projects reflect the scope and complexity of the hospital's services and operations?  For example, if the hospital offers more complex services, such as neonatal intensive care, or open heart surgery, have there been QAPI project(s) related to any of those services?	00	YES NO	O 1 O 2 O 3 O 4 O 5	
If no to any of 4.2 through 4.4, the hospital would be 297)	at ri	sk on a non	-PSI, n	on-pilot survey for a deficiency citation related to 42 CFR 482.21(d)(1) (Tag A-
4.5 Can the hospital provide evidence showing why each project was selected?  (NOTE: If the project is a QIO cooperative project or an IT project, such as computer ordered physician entry for medications or an electronic medical record, no rationale is required. Check N/A in these cases)	0 0 0	YES NO N/A	O 1 O 2 O 3 O 4 O 5	

PART 5 – PATIENT SAFETY – ADVERSE EVENTS AND MEDICAL ERRORS				
Elements to be Assessed			Manner of Assessment Code (Enter all that apply) & Surveyor Notes	
5.1 In this multipart question evaluate if the hospital's	lead	ership sets	expectations for patient safety? Specifically:	
5.1.a Is there evidence of widespread staff training or communication to convey expectations for patient safety to all staff? (e.g. training related to steps to take in a situation that feels unsafe, how to report medical errors (including near misses/close calls) adverse events, etc.)		YES NO	O 1 O 2 O 3 O 4 O 5	
5.1.b Is there evidence that the hospital has adopted policies supporting a non-punitive approach to staff reporting of medical errors (including near misses/close calls), adverse events, and situations they consider unsafe?		YES NO	O 1 O 2 O 3 O 4 O 5	
5.1.c On each unit surveyed, can staff explain what the hospital's expectations are for their role in promoting patient safety?	0	YES NO	O 1 O 2 O 3 O 4 O 5	
If no to 5.1.a, 5.1.b, or 5.1.c, the hospital would be at	risk	on a non-Ps	SI, non-pilot survey for a deficiency citation related to 42 CFR 482.21(e)(3) (Tag A-	

Elements to be Assessed			Manner of Assessment Code (Enter all that apply) & Surveyor Notes
5.2. In this multipart question evaluate if the hospital events on an ongoing basis? Specifically:	has a	a systematio	process to identify medical errors (including near misses/close calls) and adverse
5.2.a On each unit/program surveyed, can staff describe what is meant by medical errors (including near misses/close calls) and adverse events?	0 0	YES NO	O 1 O 2 O 3 O 4 O 5
5.2.b On each unit/program surveyed, can staff explain how and/or to whom they should report medical errors (including near misses/close calls) and adverse events?	0 0	YES NO	O 1 O 2 O 3 O 4 O 5
5.2.c Does the hospital employ methods, in addition to staff incident reporting, to identify possible medical errors (including near misses/close calls) and adverse events?  (Examples of other methods include, but are not limited to, retrospective medical record reviews, review of claims data, unplanned readmissions, or patient complaints/grievances, interview or survey of patients, etc.)	0 0	YES NO	O 1 O 2 O 3 O 4 O 5

Elements to be Assessed		Manner of Assessment Code (Enter all that apply) & Surveyor Notes
5.2.d Can the hospital provide evidence of medical errors (including near misses/close calls) and adverse events identified through staff reports or other methods?	O YES O NO	O 1 O 2 O 3 O 4 O 5
If no to any 5.2.a through 5.2.d, the hospital would b 482.21(c)(2) (Tag A-286)	e at risk on a no	on-PSI, non-pilot survey for a deficiency citation related to 42 CFR 482.21(a)(2) &
5.3 Is there QAPI program collaboration with infection control officer(s) to identify and track avoidable healthcare-acquired infections?	O YES O NO	O 1 O 2 O 3 O 4 O 5
5.4 Is there evidence that problems identified by infection control officer(s) are addressed through QAPI program activities?	O YES O NO	O 1 O 2 O 3 O 4 O 5
If no to 5.3 or 5.4, the hospital would be at risk on a (482.21(a)(2) (Tag A-286)	non-PSI, non-pil	ot survey for a deficiency citation related to 42 CFR 482.42(b)(1) (Tag A-756) and

Elements to be Assessed		Manner of Assessment Code (Enter all that apply) & Surveyor Notes
5.5 Does the QAPI program identify and track medication administration errors, adverse drug reactions, and drug related incompatibilities?	O YES O NO	O 1 O 2 O 3 O 4 O 5
If no to 5.5, the hospital would be at risk on a non-PS 482.21(a)(2) (Tag A-286)	l, non-pilot surv	rey for a deficiency citation related to 42 CFR 482.25(b)(6) (Tag A-508) and 42 CFR
5.6 Is there a QAPI program process for staff to report blood transfusion reactions, and reviews of reported blood transfusion reactions to identify medical errors (including near misses/close calls) and/or adverse events?	O YES O NO	O 1 O 2 O 3 O 4 O 5
If no to 5.6, the hospital would be at risk on a non-PS 482.21(a)(2) (Tag A-286)	l, non-pilot surv	rey for a deficiency citation related to 42 CFR 482.23(c)(4) (Tag A-410) and 42 CFR
5.7 Did the survey team have prior knowledge of, or identify while on-site, serious preventable adverse events that the hospital failed to identify?	O YES O NO	O 1 O 2 O 3 O 4 O 5
If yes to 5.7, the hospital would be at risk on a non-P	SI. non-pilot sur	vev for a deficiency citation related to 42 CFR 482.21(a)(2) (Tag A-286)

	d		1	ivialillel Ol Ass	sessifient Code (Enter al	that apply) & Surveyor Notes
5.8 Has the hospital conducted causa	analyses of all	O YES	0 1			
serious preventable adverse events it	has identified?	O NO	O 2			
		O N/A	O 3			
Use as your sample all serious preven	able events		0 4			
identified by the hospital in the period			O 5			
prior to the survey date? (Note: for ev						
occurred less than 2 months prior to t						
date, the hospital may have started, b	•					
completed a causal analysis.)	,					
completed a causal analysis.						
If no to 5.8, the hospital would be at	risk on a non-PSI	<mark>, non-pilot surv</mark>	ey for a do	eficiency citati	on related to 42 CFR 48	2.21(a)(2) (Tag A-286)
PART 5: CAUSAL ANALYSIS TRACERS Instructions for Questions #5.9 and 5.10: If the answer to Question #5.9 is "yes", select three causal analyses the hospital has completed for adverse events or near misses (close calls) during the last 12 - 24 months. Analyses may be of a single event/near miss or a group of similar types of events/near misses. Answer the questions in #5.10 for each analysis selected. (For at least one causal analysis selected, there should be sufficient time after implementation of preventive measures for the hospital to have evaluated the impact of those measures.) For initial certification surveys of new hospitals, this section may not apply, depending on whether any serious preventable adverse events have occurred and been identified.						
5.9 Has the hospital conducted any consurvey date? If yes continue, if no, ski	iusal analyses in t	the 12 – 24 mo	nths prior		O YES O NO	
carret acter in year continued in the form						
Elements to be Assessed		l Analysis #1	<u></u>	Caus	al Analysis #2	Causal Analysis #3
Elements to be Assessed 5.10 Write in selected causal analysis, using a code or other means to avoid capturing identifiable information on this worksheet.		l Analysis #1		Caus	al Analysis #2	Causal Analysis #3
5.10 Write in selected causal analysis, using a code or other means to avoid capturing identifiable information on this		l Analysis #1		Causa O 1	al Analysis #2	Causal Analysis #3  O 1
5.10 Write in selected causal analysis, using a code or other means to avoid capturing identifiable information on this worksheet.	Causa	l Analysis #1			al Analysis #2	
5.10 Write in selected causal analysis, using a code or other means to avoid capturing identifiable information on this worksheet.  Causal analysis selection identified	Causa	l Analysis #1		0 1	al Analysis #2	O 1
5.10 Write in selected causal analysis, using a code or other means to avoid capturing identifiable information on this worksheet.  Causal analysis selection identified	Causa  O 1 O 2	l Analysis #1		O 1 O 2	al Analysis #2	O 1 O 2
5.10 Write in selected causal analysis, using a code or other means to avoid capturing identifiable information on this worksheet.  Causal analysis selection identified	Causa  O 1 O 2 O 3	l Analysis #1		O 1 O 2 O 3	al Analysis #2	O 1 O 2 O 3

# PART 5: CAUSAL ANALYSIS TRACERS (CONTINUED)

Elements to be Assessed	Causal Analysis #1	Causal Analysis #2	Causal Analysis #3
5.10.a Has the hospital identified potential underlying causes?	O YES O NO	O YES O NO	O YES O NO
	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5
5.10.b Has the hospital identified all parts of the hospital utilizing similar processes/at similar risk?	O YES O NO	O YES O NO	O YES O NO
	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5
5.10.c Has the hospital developed and implemented preventive actions based on the analysis in at least one	O YES O NO	O YES O NO	O YES O NO
area of the hospital?	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5

# PART 5: CAUSAL ANALYSIS TRACERS (CONTINUED)

Elements to be Assessed	Causal Analysis #1	Causal Analysis #2	Causal Analysis #3
5.10.d Has the hospital evaluated the impact of the preventive actions, including tracking	O YES	O YES	O YES
	O NO	O NO	O NO
reoccurrences of similar events/near misses?	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5	O 1 O 2 O 3 O 4 O 5
5.10.e If evaluation showed the intervention(s) did not meet goals, did the hospital implement a revised intervention and evaluate it?	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5	O YES O NO O N/A O 1 O 2 O 3 O 4 O 5
5.10.f Has the hospital implemented preventive actions found to be effective in all parts of	O YES	O YES	O YES
	O NO	O NO	O NO
the hospital utilizing similar processes/at similar risk, unless there are documented reasons for not doing so?	O 1	O 1	O 1
	O 2	O 2	O 2
	O 3	O 3	O 3
	O 4	O 4	O 4
	O 5	O 5	O 5

If no to any, 5.10.a through 5.10.f, the hospital would be at risk on a non-PSI, non-pilot survey for a deficiency citation related to 42 CFR 482.21(a)(1) & (a)(2) & (c)(2) (Tag A-286)

PART 6 – BROAD QAPI REQUIREMENTS AND LEADERSHIP RESPONSIBILITIES				
Elements to be Assessed			Manner of Assessment Code (Enter all that apply) & Surveyor Notes	
6.1 Is there evidence that the hospital has a formal QAPI program - including written policies and procedures, budgeted resources, and clearly identified responsible staff - approved by the governing body after input from the CEO and medical staff leadership?	00	YES NO	O 1 O 2 O 3 O 4 O 5	
If no to 6.1, for pilot only, the hospital would be at ris 309)	sk on	a non-PSI,	, non-pilot survey for a deficiency citation related to 42 CFR 482.21(e)(1) & (2) (Tag A-	
6.1.a Has the hospital maintained and made	0	YES	O 1	
available for surveyor review evidence of its QAPI program?	0	NO	O 2 O 3 O 4 O 5	
-		•	urvey for a deficiency citation related to 42 CFR 482.21 (Tag A-263)	
6.2 In this multipart question evaluate if the hospital's				
6.2.a Using information on services offered from the Hospital/CAH Data Base Worksheet, can the	0 0	YES NO	O 1 O 2	
QAPI manager provide evidence of QAPI monitoring related to each service?		NO	O 2 O 3 O 4 O 5	
If no to 6.2.a. the hospital would be at risk on a non-	PSI. n	on-nilot su	urvey for a deficiency citation related to 42 CFR 482.21 (Tag A-263 or A-308)	

PART 6 – BROAD QAPI REQUIREMENTS AND LEADERSHIP RESPONSIBILITIES (CONTINUED)

Elements to be Assessed				Manner of Assessment Code (Enter all that apply) & Surveyor Notes
6.2.b Using information from the hospital identifying services provided under arrangement (contract), can the QAPI manager provide evidence of QAPI monitoring for each service related to clinical care provided under contract or arrangement? (Exclusively administrative contractual services, e.g., payroll preparation, are not required to be included in the QAPI program.)	000	YES NO N/A	O 1 O 2 O 3 O 4 O 5	
If no to 6.2.b, the hospital would be at risk on a non-either A-263 or A-308)	PSI, r	on-pilot su	rvey f	or a deficiency citation related to 42 CFR 482.12(e) and 482.21 (Tags A-083 and
6.3 Is there evidence that the governing body, hospital CEO, Medical Staff leadership, and other senior administrative officials, e.g., Director of Nursing, each play a role in QAPI program planning and implementation?	00	YES NO	O 1 O 2 O 3 O 4 O 5	
				a deficiency citation related to 42 CFR 482.21(e)(2) (Tag A-309)
6.4 Is there evidence, e.g. in minutes, that the hospital	al's go	overning bo	dy:	
6.4.a Approves QAPI program indicators selected and frequency of data collection?	0 0	YES NO	O 1 O 2 O 3 O 4 O 5	
If no to 6.4.a, the hospital would be at risk on a non-	PSI, n	on-pilot su	rvey fo	or a deficiency citation related to 42 CFR 482.21(b)(3) (Tag A-273)

# PART 6 – BROAD QAPI REQUIREMENTS AND LEADERSHIP RESPONSIBILITIES (CONTINUED)

Elements to be Assessed		Manner of Assessment Code (Enter all that apply) & Surveyor Notes
6.4.b Ensures the QAPI program annually determines the number of distinct QAPI projects to be conducted in the coming year?	O YES O NO	O 1 O 2 O 3 O 4 O 5
6.4.c Actively reviews the results of QAPI data collection, analyses, activities, projects and makes decisions based on such review?	O YES O NO	O 1 O 2 O 3 O 4 O 5
If no to either, 6.4.b or 6.4.c, the hospital would be a (Tag A-309)	t risk on a non-F	PSI, non-pilot survey for a deficiency citation related to 42 CFR 482.21(e)(2) & (e)(5)
6.4.d Holds the CEO accountable for the effectiveness of the QAPI program?	O YES O NO	O 1 O 2 O 3 O 4 O 5
If no to 6.4.d, the hospital would be at risk on a non-309 & A-057)	PSI, non-pilot su	urvey for a deficiency citation related to 42 CFR 482.21(e)(2) and 482.12(b) (Tags A-

# PART 6 – BROAD QAPI REQUIREMENTS AND LEADERSHIP RESPONSIBILITIES (CONTINUED)

Elements to be Assessed			Manner of Assessment Code (Enter all that apply) & Surveyor Notes
6.5 Regarding resource allocation:			
6.5.a Is there evidence of the amount of resources	0	YES	0 1
(funding and personnel) dedicated to the hospital's	0	NO	O 2
QAPI program and the functions for which those			O 3
resources are used?			O 4
			O 5
	<u> </u>		
If no to 6.5.a, the hospital would be at risk on a non-	PSI, ı	non-pilot su	rvey for a deficiency citation related to 42 CFR 482.21(e)(4) (Tag A-315)
6.5.b If there are condition-level QAPI program	0	YES	0 1
deficiencies, is there evidence that lack of QAPI	0	NO	O 2
resources are a significant contributing cause of	0	N/A	O 3
these deficiencies?			O 4
			O 5
If yes to 6.5.b, the hospital would be at risk on a non	-PSI,	non-pilot s	urvey for a deficiency citation related to 42 CFR 482.21(e)(4) (Tag A-315)