



Center for Clinical Standards and Quality/Survey & Certification Group

REF: S&C: 13-03-Hospital

DATE: November 9, 2012

TO: State Survey Agency Directors

FROM: Director
Survey & Certification Group

SUBJECT: Patient Safety Initiative FY 2013 Pilot Phase – Revised Draft Surveyor Worksheets

Memorandum Summary

- ***Patient Safety Initiative:*** The Centers for Medicare & Medicaid Services (CMS) is continuing to test revised surveyor worksheets for assessing compliance with three hospital Conditions of Participation (CoPs): Quality Assessment and Performance Improvement (QAPI), Infection Control, and Discharge Planning. We are focusing on compliance with these CoPs as a means to reduce hospital-acquired conditions (HACs), including healthcare associated infections (HAIs), and preventable readmissions.
- ***Draft Worksheets Made Public:*** Via this memorandum we are making the revised draft worksheets publicly available. As was the case previously, there may be additional revisions to the worksheets at the end of FY 2013.

Patient Safety Initiative Pilot Phase

The Survey & Certification Group (SCG) Patient Safety Initiative is continuing to pilot test three revised surveyor worksheets designed to help surveyors assess compliance with the hospital CoPs for QAPI, infection control, and discharge planning. In S&C-12-01 released October 14, 2011 and in S&C-12-32 released May 18, 2012, we made available to the public copies of the initial and revised draft surveyor worksheets. These worksheets were used during the pre-test and pilot phases of the SCG initiative, from September 2011 through September 2012.

The three worksheets have been further revised, both to refine some questions and to make clearer the non-punitive nature of the pilot test, which is designed not only to develop effective tools for future surveyor use in assessing compliance, but also to serve as a risk management assessment tool for hospitals. To emphasize the non-punitive nature of this pilot, in FY 2013 no citations will be issued at either the standard- or condition-level on the Form CMS 2567,

Statement of Deficiencies and Plan of Correction, unless an Immediate Jeopardy situation is identified. At the same time, the revised worksheets have eliminated citation instructions and instead identify areas at in which a hospital might potentially be at risk of non-compliance in the future.

In contrast to FY 2012, in FY 2013 surveyors in all State Survey Agencies (SAs) will be testing the three surveyor worksheets together in one integrated survey of one hospital campus. Multi-campus hospitals will only need to be surveyed at one inpatient hospital location, although additional campuses may also be included. During the course of FY 2013, SAs will be required to perform from one to nine integrated PSI surveys in their States, based on the number of Medicare-certified hospitals in each State. As was the case in both the pre-test and FY 2012 pilot phases, hospitals will be selected for a pilot survey based on a combination of risk-adjusted all-cause Medicare readmissions data and/or other factors.

Since no citations will be issued, hospitals will not be required to submit Plans of Correction as part of these PSI surveys. Surveyors will provide feedback based on the draft tools at the end of the survey to hospital staff, detailing areas at risk. SAs will document only the completion of the survey on the Form CMS 2567, which will be used for internal CMS administrative purposes. No Form CMS 2567 will be issued to the hospital. A copy of each completed worksheet that is submitted to CMS as part of our evaluation of this pilot will also be provided to the hospital.

Public Distribution

The three hospital surveyor worksheets are being publicly distributed via this memo. We encourage all hospitals to voluntarily utilize the worksheets for self assessment of their practices related to QAPI, infection control and discharge planning. Feedback from hospitals after utilizing the worksheets is welcome. We also welcome feedback from the hospital industry at large, from patients and consumer groups, and others committed to quality and patient safety.

Please submit all questions to PFP.SCG@cms.hhs.gov.

/s/
Thomas E. Hamilton

Attachments: (3)

Patient Safety Initiative Pilot Hospital QAPI Worksheet 2013
Patient Safety Initiative Pilot Hospital Infection Control Worksheet 2013
Patient Safety Initiative Pilot Hospital Discharge Planning Worksheet 2013

cc: Survey & Certification Regional Office Management