



Center for Clinical Standards and Quality/Survey & Certification Group

Admin Info: 17-21-NH

DATE: July 07, 2017

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Information Technology (IT) Support and Planning for the New Long-Term Care (LTC) Survey Process (LTCSP) Implementation

Memorandum Summary

- **Implementation of New Requirements and a Survey Process:** The Centers for Medicare & Medicaid Services (CMS) previously announced plans to implement a new LTC survey process in November 2017 (see Admin Info: 16-32-NH). This memorandum provides further information related to the technology aspects of the new survey process, such as:
 - The roles and responsibilities of State Survey Agency (SSA) and CMS for technical support for surveyors;
 - Resources information; and
 - Hardware, software, and encryption requirements for equipment that will be used by surveyors to conduct surveys (i.e., laptops and tablets).
- **LTC Survey Software Training for IT personnel:** CMS is offering training for IT personnel in Longmont Colorado in August/September 2017. The course is designed for State Agency (SA) and Regional Office (RO) personnel who will be providing technical support to surveyors conducting the LTC survey process.

Purpose

The purpose of this memo is to communicate, clarify and standardize expected roles and responsibilities related to the LTCSP software implementation.

The overall goal of the LTC new survey effort is to develop a unified survey process, to ensure nursing homes are complying with the federal requirements for participation to provide quality care that ensures the safety of residents, and enables them to meet their highest practicable well-being. CMS is currently testing the new survey process and elements of the computer software that incorporates aspects of both the Traditional and Quality Indicator Survey (QIS) processes. The new survey process will be implemented in November 2017 along with phase II of the final rule of the Requirements for Participation for LTC facilities.

Resources

- 1) **User Guide:** New Long-Term Care Survey Process Procedure Guide
- 2) Video of the recorded software demonstration can be found on the QTSO website (in the Member's Only section) at <https://www.qtso.com/login.php>.
- 3) For issues related to ASPEN or the functionality of the software for the LTC new survey process, please contact: QTSO\QIES help desk hotline #. 1-888-477-7876 or email at help@qtso.com
- 4) Information about the survey process and implementation can be found on the CMS website at: <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Nursing-Homes.html>
- 5) For questions related to the survey process or new LTC regulations, please contact: NHSurveyDevelopment@cms.hhs.gov
- 6) Forms information: The State Readiness Checklist and RO Readiness Checklist documents can be found on the QTSO website.
- 7) Acceptable Risk Safeguards (ARS) 3.0 Policy: <https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/InformationSecurity/Info-Security-Library-Items/ARS-30-Publication.html?DLPage=1&DLEntries=10&DLSort=0&DLSortDir=ascending>

Roles and Responsibilities

- **SAs** are responsible for providing the following support for the new LTC survey process:
 1. Training and technical support for basic computer skills among surveyors, such as working knowledge of how to use a laptop and its components (e.g., keyboard/mouse, touchscreen calibration and navigating , encrypted flash\jump drive, email, connecting to a secured network, etc.);
 2. Support for non-survey software, such as productivity software tools, internet browser, encryption software, security and connectivity software,
 3. Ensuring all surveyors complete all trainings associated with the new LTC Survey process;
 4. Technical support for general questions and hardware issues, such as equipment set-up, or spare laptops if a surveyor's laptop malfunctions;
 5. Equipment that meets the minimum technology requirements listed in the *Technology Requirements* section on page 5 of this memo;
 6. Ensuring secure internet connectivity where WiFi is available, including access to the survey software through a State's firewall;
 7. Additional connectivity devices that the SA feels necessary to effectively conduct surveys (e.g., Mifi); and
 8. Establishing contact information and a process for surveyors to use when issues arise related to the items above.
 9. Awareness of the methods of data backup/data sharing/synchronization of the LTCSP data (this can be found in the user guide – see Resources section above).

- **Surveyors** are responsible for the following:
 1. Obtaining and maintaining working knowledge of their devices (e.g., laptop or tablet) and components – (Display, Keyboard, Mouse, power cord, Ethernet Port, USB Port, encrypted USB flash (or “thumb”) drive, etc.);
 2. Computer functionality, such as how to create and save document files (both to the computer and to encrypted removable drive). How to send encrypted email attachments that contain PHI or PII, navigating the required software programs, etc.;
 3. Proficiency in typing;
 4. How to use any printer(s) they may access; connecting to a secured wireless network, such as how to access and use their State supplied device (e.g., Mifi) or other network connection (e.g., LTC facility’s wireless network, the SA’s WiFi, etc.);
 5. Completing all required training for the new survey process, and ensuring proficiency with the software and process prior to beginning to conduct surveys;
 6. Awareness of the methods of data backup/data sharing/synchronization of the LTCSP data (listed in the user guide), and
 7. Following the State’s process for resolving issues, and knowing the appropriate entity to contact for a particular issue (e.g., State technical support vs. QIES help desk).

- **CMS/RO Ambassadors** – Serve as a resource for State Agencies for the new survey process. ROs are also expected to ensure their RO staff and SA’s have:
 1. Appropriate knowledge of the entire survey process and the RO role;
 2. Advanced awareness of, and training on the new survey process; and
 3. Awareness of the methods of data backup/data sharing/synchronization of the LTCSP data (listed in the user guide – see Resources section on page 2).
 4. Equipment that meets the minimum technology requirements listed in the *Technology Requirements* section on page 5 of this memo.

- **CMS/Central Office**
 - Technology support -Division of Quality Systems for Assessments & Surveys (DQSAS)**
 1. Serves as Information Technology lead to oversee the technology related portion of the LTC new survey process implementation;
 2. Responsible for overseeing the ATG helpdesk support for ASPEN and the new LTC survey process software for all stakeholders. Note: Surveyors may contact the helpdesk directly for issues related to the LTCSP software, but not for general support, such as the items listed in the roles and responsibilities for SSAs above; and
 3. Assists in coordinating survey software training as needed.

 - Survey process support CMS/Division of Nursing Homes (DNH)**
 1. Oversee the new LTC survey process and implementation of the Requirements for Participation for LTC facilities; and
 2. Provide support for questions or issues related to the survey process, the requirements for LTC facilities, or survey policies (e.g., State Operations Manual Appendix PP, F-tags, etc.).

Important Dates Based on Current Estimated Timeframes

Dates	Action
Now through Spring 2017	Seek approval for and purchase hardware if needed
Now through July 2017	Configure equipment and orient surveyors to hardware and computer skills
August & September 2017 August 17th – 18th August 21 st – 22nd August 24th – 25th August 28th – 29th August 31 – September 1st September 6th – 7th	Training for IT personnel in Longmont Colorado. This course is designed for State and Regional Office personnel who will be providing technical support to surveyors conducting the LTC survey process.
August through October 2017	Train LTC Surveyors on new survey process
November 28, 2017	Implement new survey process

CMS encourages States to network and collaborate with each other to identify individual optimal technology options and best practices.

Due to the diversity of survey environments encountered by States, the below specifications are intended to serve as a nationwide guideline for technology requirements related to the survey process. It is expected that surveyors will be provided with equipment and processes that:

- Meets or exceeds the specifications listed in the *Technology Requirements* table on page 5.
- Allows for continuity and completion of surveys in the event of unexpected equipment issues, without the need to reschedule. (e.g., establish a loaner equipment pool)
- Provides a secure Internet connection wherever Internet access is available
- Facilitates effective survey techniques that consider technology’s impact on building rapport with residents and staff (i.e., Using a tablet instead of a laptop so there is no display screen distracting visibility between resident and surveyor)
- Considers the physical specifications keeping in mind that surveyors will be travelling with the equipment and carrying it around throughout the day (e.g., weight of the machine, protective covers, accessories).

Troubleshooting the new LTC survey process in the field

In addition to the **Resources** described on page 2, CMS has received a number of questions about the extent to which the survey team will need to share or synchronize information, or have Internet access once onsite. This is of particular concern for survey teams that may be in remote areas and unable to have Internet connectivity. The survey software/process requires data sharing and synchronization across team members at various points. This process will still work even if surveyors do not have an Internet connection. The software is being designed to be stored locally on the computer and information can be shared through a wireless connection or a wired connection (linking the team members computers, or an external drive such as a USB drive).

Hardware

It is expected that touchscreen tablet technology will facilitate the survey process, but it is not required. States that do not currently have the compatible technology should purchase the equipment and orient their surveyors to these devices by August 1, 2017 (earlier for State trainers). CMS anticipates implementation of the new survey process November 28, 2017. Please factor-in time for training with new equipment. Minimum specifications for the technology requirements are outlined below.

Technology Requirements

Client Requirements: EXISTING or NEW EQUIPMENT	
Component	Minimum Specifications Required for Implementation
<i>Printer*</i>	Not required - but teams will need to print the <i>Facility Matrix</i>
<i>Monitor</i>	Desktop: 19"(or larger), Color, Flat Panel Laptop or Tablet: $\geq 1024 \times 768$ screen resolution Flat Panel
<i>Processor</i>	Pentium Class (or equivalent) @ 2.0 GHz
<i>Memory (RAM)</i>	4 GB
<i>Available Disk Space</i>	10 GB on SATA 2 drive at 7200 RPM
<i>Operating System**</i>	Windows 7 – 32 bit or 64 bit Windows 8.1 – 32 bit or 64 bit Windows 10 – 32 bit Windows 10 – 64 bit
<i>Browser ¹</i>	Internet Explorer version-11.0 compatibility mode with TLS 1.2 settings
<i>Secure Access/Encryption (See Encryption Policy)</i>	Required – See Encryption Policy Below
<i>Anti-virus</i>	Installed and activated, with current license
<i>Universal Serial Bus Port ²</i>	Two
<i>Removable Media (see Encryption Policy) ²</i>	USB Flash Drive
<i>Pointing Device ³</i>	Mouse or equivalent (e.g. trackball or touchpad) and Pen/Stylus for tablet
<i>Network Interface Card (See CMS ARS security guidelines for acceptable wireless configurations)</i>	Wired (recommended) for network connectivity; and Wireless network cards, must support WPA-2 level encryption
<i>External USB Hub</i>	3 external USB sockets

Client Requirements: EXISTING or NEW EQUIPMENT	
Component	Minimum Specifications Required for Implementation
Audio ³	Attachable or built-in microphone, Audio port for headphones, standard built-in speakers
Battery (laptop or tablet)	6-cell lithium-ion
Side or Rear Cooling (laptop or tablet)	Recommended for all

Please contact the QTSO help desk (888-477-7876) to obtain current information on the status of CMS software support for Windows operating systems.

* *Printer*: Having a printer during the survey is not required. However, at a minimum; survey teams will need to print the *Facility Matrix*. See the New Long Term Care Survey Process Procedure Guide, Offsite Prep section, ‘Print the following documents’ subsection for details.

** Some States advised CMS that Microsoft was forcing a Windows 10 upgrade to their existing Windows 7 & 8.1 operating systems through the auto-update feature, using the ‘Recommended updates’ feature instead of the ‘Optional updates’ option previously used. States considering implementing Windows 10 should carefully evaluate CMS software with this Operating System before full scale deployment.

Note: Operating systems need to be current with all Windows security updates and applicable patches. Be sure to read the ‘Recommended updates’ before accepting.

¹ *Internet Explorer*: (version 11 or newer), may need to operate in Compatibility Mode in order for the software to operate properly.

Per the Internet Explorer Support Lifecycle Policy FAQ (<https://support.microsoft.com/en-us/gp/microsoft-internet-explorer>), only the most current version of Internet Explorer available for a supported operating system will receive technical support and security updates.

Internet Explorer v 9.0 and v 10.0 is no longer supported as of January 1st 2016. Only Internet Explorer v 11.0 running in compatibility mode is currently supported.

Due to new CMS security requirements, all browsers must have the TLS 1.2 setting enabled.

² Many tablets do not have two USB ports. Having only one port should be fine, the user can add additional ports using an inexpensive USB 2.0 or faster hub.

Having USB 2.0 port also should be fine for the foreseeable future (at least the next year.)

³ CMS recently received feedback that touch screen text capture detail appears to be significantly affected by the type of stylus used. CMS recommends using the pen/pencil type stylus with the plastic (non-rubber) tip.

There may be a need for external microphone and/or speakers depending on the audio quality from the device. This does not change any resident privacy issues that may need to be addressed in the use of these devices.

Encryption Policy

CMS' encryption policy requires all agency data be protected from unauthorized access. There may be various levels of protection for agency data, but for personally identifiable information (PII), the policy states that dissemination of such data using any portable devices or recordable media, (e.g., CDs, DVDs, Cartridges, Diskettes, Laptops, External Hard Drives, USB Flash or thumb drives, etc.), requires encryption. Whole disk encryption of the hard-drive for Laptops or Tablet PCs must be employed. Encryption is the process of protecting stored or transmitted information with a password (key) so that it is indecipherable until the intended recipient uses the password to access it.

In accordance with the CMS encryption policy, all workstations with installed QIES components must have encryption software installed that meets or exceeds the standards set forth in the "CMS Information Security Acceptable Risk Safeguards (ARS)".

This includes all QIES components installed on Laptop/Tablet PCs as well as any removable media and/or cloud computing used to disseminate PII/PHI. Specifically, the following sections of the ARS should be referenced:

- IA-7 Cryptographic Module Authentication (Specifies acceptable encryption type –FIPS 140-2 compliant (<http://csrc.nist.gov/publications/PubsFIPS.html>) NIST validated module. (<http://csrc.nist.gov/groups/STM/cmvp/index.html>))
- IA-2 Identification and Authentication
- AC-3 Access Enforcement
- AC-4 Information Flow Enforcement;
- AC-19 Access Control for Mobile Devices (encryption requirement only)
- MP-5 Media Transport
- SC-8 Transmission Confidential Integrity
- SC-12 Cryptographic Key Establishment and Management

Note: In addition to these encryption sections, agencies are encouraged to review the entire Acceptable Risk Safeguards (ARS) as a guideline for enterprise-wide security practices. An updated **ARS v3.0 policy was published on January 31, 2017**. States are responsible for ensuring that encryption software has the capability of creating encrypted files that are self-extracting with a password key.

Additionally, some agencies have home-based staff using QIES software installed on home workstations. Such home-based systems must be protected with encryption software as described above and comply with CMS controls as defined in the ARS.

Webinar and Online Course Participation

Videos are often used in the webinar training courses for scenario based learning activities. In order to accommodate the audio portion of the video, participants need active computer speakers with volume control. If the participants are in a cubicle environment, separate headsets may be needed to prevent disturbance to individuals working in close proximity.

CMS requests State and Federal Surveyors be allowed access to CMS YouTube site: <https://www.youtube.com/user/CMSHHSgov>.

Adobe Connect

The current platform for webinars is Adobe Connect. No software purchase is necessary; however an up-to-date version of Adobe Flash Player may need to be downloaded.

IT Support for Survey Process

Based on user experience feedback with the QIS, States have been very successful in implementing a computer-based survey where consolidated IT support has been available (e.g., a specific individual). CMS expects that IT support staff will have familiarity with the survey process through attending survey training and/or observing onsite surveys.

Other Best Practice feedback from States;

- Surveyors do better with tablets, especially those with detachable keyboards. For purchases, be sure to factor the equipment weight and the duration the surveyor will be carrying the equipment.
- Recommend getting a sturdy case and extended warranty to protect tablet from accidental drops, theft, etc.
- Internet Connectivity: Some States supply surveyors with cell phones or wireless modems (aka. MiFi), other States allow surveyors to connect to any available Internet connection. In all instances, regardless of the connection source, surveyors should only use a secure encrypted (password protected) source that requires authentication for Internet connection.
- Partner-up with other States through a ‘buddy program’ to help with best practices and tips for overcoming any potential obstacles (contact AHFSA leadership).

Other Considerations: There are other costs and considerations that may not be discussed. For example, CMS is aware that onsite survey time is a significant consideration for States. We cannot predict the impact of the survey process changes on onsite time, but we will be monitoring it closely. It is expected that surveyors will also experience a learning curve with the revised survey process. CMS also recognizes that training of enforcement staff and providers on regulations and the revised survey process are important components of any roll-out. We also understand that States may have concerns about meeting their State Performance Standards and will be having additional discussions with stakeholders regarding this. More details will be released as they become available.

Contact: We understand that the proposed changes may have a significant impact on States and Regions. Any feedback and questions you may have can be sent to NHSurveyDevelopment@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/
David R. Wright

cc: Survey and Certification Regional Office Management