



**Center for Clinical Standards and Quality/Survey & Certification Group**

**Admin Info: 17-26-Deemed Providers/Suppliers**

**DATE:** September 1, 2017

**TO:** State Survey Agency Directors

**FROM:** Director  
Survey and Certification Group

**SUBJECT:** Validation Survey Attestation Procedures for Fiscal Year (FY) 2017

**Memorandum Summary**

- **Validation Survey Attestation Process:** The Centers for Medicare & Medicaid Services (CMS) will employ an attestation process for FY 2017 to Reporting and Supplemental Budget Allocations to ensure that State Survey Agencies (SAs) are paid for hospital, Psychiatric Hospital, Home Health Agency (HHA), Hospice and Ambulatory Surgical Center (ASC) supplemental validation surveys conducted in FY 2017.
- **Timeframes for Attestation:** SAs must submit an attestation to their CMS Regional Office (RO) **no later than September 15, 2017** indicating, for each provider/supplier type, the number of supplemental validation surveys assigned that have not yet been reported to CMS as completed as of August 21, 2017, but for which the SA guarantees that it has already or will complete the on-site portion of the survey on or before September 30, 2017. Other standard validation survey requirements must also be met.

**Background**

Timely completion of all assigned deemed status provider/supplier validation surveys, whether they are funded through SA base budgets or supplemental payments, is essential to CMS' oversight of national accrediting organizations. As of August 21, 2017, the RO monthly validation report indicates that a significant number of the assigned supplemental validation surveys remain to be completed by the SAs:

| <b>Program Type</b> | <b>Supplemental Validation Surveys Assigned</b> | <b>Supplemental Validation Surveys Reported as Complete</b> | <b>Outstanding Supplemental Surveys</b> |
|---------------------|---|---|---|
| Hospitals           | 32  | 19  | 13                                      |
| Psych Hospitals     | 21  | 20  | 1                                       |
| HHAs                | 73  | 62  | 11                                      |
| Hospice             | 34  | 33  | 1                                       |
| ASCs                | 74  | 64  | 10                                      |

CMS generally pays SAs for supplemental validation surveys only after evidence of completion of the survey. However, due to end of the FY timing constraints and in order to ensure that SAs actually receive all supplemental payments they are entitled to, CMS is, as in prior years, using an attestation process as the basis for the final FY 2017 supplemental payments. **The attestation is required only for those supplemental validation surveys that have not been reported as complete as of the August 21, 2017 RO validation report.**

### **SA Attestation**

CMS will pay SA's for FY 2017 supplemental validation surveys assigned, but not yet completed as long as:

- The SA submits an attestation (see attached) that it will complete the on-site portion of the supplemental validation survey no later than 60-days after the AO survey end date, which in all cases must be **prior to September 30, 2017.**
- The SA attests that it will complete for each supplemental validation survey the CMS-2567 in ASPEN Central Office (CO) for RO review and subsequent timely upload, but **no later than November 30, 2017.**
- The SA attestation must list the facility name, CMS Certification Number (CCN), provider type, scheduled SA survey date, and a statement that all conditions outlined above will be met by the SA, as appropriate.
- The SA attestation must be completed in its entirety, signed and forwarded electronically to the RO **no later than September 8, 2017.**

### **RO Role**

Notify affected SAs of their need to submit a completed attestation to the RO no later than September 15, 2017. CO will provide each RO with a list of affected SAs, including the assigned validation surveys not reported as completed or which were assigned on August 5, 2017.

- Review the submitted SA attestations for accuracy and completeness;
- Initial the attestation form and forward an electronic copy to the CO Accreditation mailbox at [SCGAccreditationCO@cms.hhs.gov](mailto:SCGAccreditationCO@cms.hhs.gov) **no later than September 15, 2017;**
- Log the SA reported planned dates for the SA supplemental surveys on the monthly RO Validation Survey Activity reports. All supplemental validation samples selected in FY 2017 must be included if not previously reported as complete on the RO monthly Validation Survey Activity report; and,
- Monitor that these surveys and all associated required actions are completed timely.

***As a reminder,*** CMS CO releases the monthly validation sample selections by the 5<sup>th</sup> of each month to the ROs. All validation surveys must be authorized by the RO on the appropriate Form CMS-2802 immediately upon receipt from CO of the monthly validation sample selection. **All** validation survey activity for hospitals, critical access hospitals, HHAs, and ASCs must continue to be reported by the ROs on the monthly Validation Survey Activity report that is due to CO by the **21<sup>st</sup> of each month.** This report is the primary method used by CO for monitoring

the progress of the validation survey program. As part of this report, the RO must include the date of ASPEN entry of the validation survey outcome. This date should be entered as soon as the RO issues the notice to the facility of the validation survey findings. The survey is not considered final until the ASPEN upload is completed.

A copy of all validation survey Form CMS 2567s and associated letters sent to the provider or supplier by the RO must also be uploaded into the Validation SharePoint site by the RO promptly, to enable analysis and comparison of the results with the AO surveys.

**Contact:** Please forward any questions concerning the contents of this memo to the Central Office Accreditation mailbox at [SCGAccreditationCO@cms.hhs.gov](mailto:SCGAccreditationCO@cms.hhs.gov).

**Effective Date:** Immediately. This information 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

Attachment: State Survey Agency Attestation

cc: Survey and Certification Regional Office Management