



Center for Clinical Standards and Quality/Survey & Certification Group

Admin Info: 17-27-ALL

DATE: September 01, 2017

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Clarification on the Issuance of Survey Results Following a Revisit

Memorandum Summary

- CMS is clarifying that the CMS Form 2567B is required for each revisit, but should only be shared between the State Survey Agency (SA) and Regional Offices (RO).
- CMS is clarifying that the CMS Form 2567 Statement of Deficiencies is required for each survey and is sent to the provider/supplier to communicate compliance or noncompliance.
- **This Administrative Informational Memo supersedes Admin Info 17-10-ALL issued March 24, 2017.**

Background

There has been inconsistency among the CMS ROs about the survey report forms (see below) sent to a provider when a revisit is conducted and all deficiencies from the original survey are found to be corrected. Some ROs require that a CMS Form 2567, with a statement that all deficiencies are resolved, be issued in addition to the CMS Form 2567B which denotes the deficiency(ies) from the original survey and the date(s) of correction for each deficiency. The thought being that providers and others would be confused in the absence of a CMS Form 2567 stating that no deficiencies were found.

- **CMS Form 2567-B:** The CMS Form 2567B is used to communicate correction of deficiencies. It is created in ACO/AEM when a revisit is conducted to an original survey, and all subsequent revisits, until all deficiencies have been corrected.
- **CMS Form 1539, Certification & Transmittal (C&T):** The C&T is used by the SA to communicate to the RO proposed actions, including certification and termination. It is created in ACO and AEM for certification surveys, complaints, and revisits that require RO action.
- **CMS Form 2567 (Statement of Deficiencies):** A CMS Form 2567, is created each time there is a survey of any type. It is used to communicate to the provider/supplier when deficiencies are cited, recited, newly cited at a revisit, or when no deficiencies are cited.

New Process

The CMS 2567 is used to communicate noncompliance or compliance as determined for any survey including a revisit and it is sent to the provider/supplier to inform them of their compliance status. **The CMS Form 2567B will be an internal document in ACO solely for the SAs and ROs to communicate correction of deficiencies.** In an effort to simplify the process and promote national consistency for the issuance of a CMS Form 2567, and describe the use of a CMS Form 2567B, we are providing the following guidance.

- The SA is required to complete a CMS 2567 for every survey and revisit to a survey. The Form 2567 will document new deficiencies, uncorrected deficiencies with new findings of noncompliance, or a statement that the provider/supplier is in compliance with the requirements surveyed.
- Once the SA determines all previous deficiencies to the original survey are corrected and no new deficiencies are cited, a CMS 2567, **with a statement of compliance**, is sent to the provider/supplier. Although no cover letter is required, some SA's send the CMS 2567 in conjunction with a notice letter, which is acceptable.
 - An example of a statement of compliance would be: "A revisit survey was conducted on XXX for all previous deficiencies cited on XXX. All deficiencies have been corrected, and no new noncompliance was found. The facility is in compliance with all regulations surveyed."
- The SA continues to create a CMS Form 2567B in ACO, listing all deficiencies corrected and dates of correction, for every revisit conducted to an original survey.
- The SA does **not** send the CMS Form 2567B to the provider/supplier after any revisit. **It is solely for the SAs and ROs to communicate correction of deficiencies.**

Note: The box at the bottom of the Form 2567B entitled "Check for any uncorrected deficiencies" is not checked when all deficiencies have been corrected.

- Depending on the action that results from the 2567B, the SA communicates to the RO, in ASPEN, the action they are recommending on the Form 1539.

Contact: Please contact your Regional Office.

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