



Center for Clinical Standards and Quality/Quality, Safety & Oversight Group

Admin Info: 20-05-Hospital/Psych

DATE: January 13, 2020

TO: State Survey Agency Directors

FROM: Director
Quality, Safety & Oversight Group

SUBJECT: Informational Notice: Forthcoming Integration of the Psychiatric Hospital Program into the Hospital Program and State Operations Manual (SOM) Changes

Memorandum Summary

- **To improve the identification of quality issues, the Centers for Medicare & Medicaid Services (CMS) is in the process of integrating the psychiatric hospital program survey into the hospital program survey:** Currently the hospital and psychiatric hospital programs are reviewed separately for compliance with the Conditions of Participation. Our intent is to ensure psychiatric hospital services are evaluated in the context of the overall hospital program to better identify systemic quality issues.
- **Update and relocation of the Interpretive Guidelines for Psychiatric Hospitals:** The interpretive guidelines in SOM Appendix AA for the special psychiatric Conditions of Participation (CoPs) will be updated and relocated in the interpretive guidance for Hospitals in Appendix A. Appendix AA will be deleted.
- **Develop training to provide the necessary competencies for all State Survey Agency surveyors to evaluate compliance with the psychiatric hospital CoPs:** CMS is developing training to assist surveyors in identifying compliance with the special psychiatric hospital CoPs. Currently, the SA surveys the hospital requirements in all non-deemed psychiatric hospitals as well as during validation and complaint surveys of deemed psychiatric hospitals. Once the psychiatric program is moved to the hospital program, the hospital survey team will assess compliance with all requirements. All interpretive guidelines and survey procedures will be located in Appendix A.

Background

To participate in Medicare, a psychiatric hospital is required to meet both general hospital CoPs and the special CoPs for psychiatric hospitals which were established in 1986. Psychiatric

hospitals are required to comply with all of the Medicare hospital CoPs, except Medical Record Services at §482.24, because there is a separate CoP for psychiatric hospitals (Special Medical Records Requirements at §482.61). In addition to this special CoP, psychiatric hospitals must also comply with Special Provisions Applying to Psychiatric Hospitals (§482.60), and Special Staff Requirements (§482.62). Guidance for surveyors regarding the special psychiatric CoPs is located in the CMS SOM Appendix AA.

Psychiatric hospitals are subject to initial certification and recertification surveys, as well as complaint surveys by the States for the hospital requirements. A CMS contractor surveys for the special psychiatric CoPs. Currently two states, Texas and Louisiana, use their own surveyors to complete both the hospital and psychiatric CoP reviews during a consolidated inspection. The CMS contractor currently completes or support approximately 100 psychiatric hospital surveys per year.

Program Update: CMS is planning to integrate the psychiatric hospital program survey into the hospital program survey and transfer these survey activities to the States. We believe that consolidating the psychiatric and hospital CoP oversight will improve the overall quality of the care by ensuring that systemic issues are more easily identified, decreasing multiple survey visits and improving overall cost efficiency. Under this change, psychiatric hospitals will have one consolidated set of regulatory and guidance documents to follow as well as a single survey team with a consolidated CMS-2567 deficiency report.

We do not believe that this change will change the surveyor training or experience requirements. Previously, surveyors who assessed compliance with the psychiatric hospital CoPs were required to have specialized psychiatric education, training, and experience beyond what is required for other types of hospital services; however, this requirement has been removed. State Agency Hospital surveyors will be provided training on the psychiatric CoPs to appropriately survey to these requirements. The training is currently available on our Quality, Safety & Education Portal (QSEP) <https://qsep.cms.gov/>. The FY 2020 QSOG Mission and Priority Document will reflect these changes.

Changes to SOM: The merger of Appendix AA into Appendix A is completed, and the B Tags from Appendix AA have been changed to A Tags. All corresponding survey systems containing A Tags or B Tags will be updated accordingly.

Expected Date of Completion: The full transition of survey activity to all SAs will be complete by March 2020. We will provide a subsequent policy memorandum to provide the changes in the SOM.

Contact: Comments and questions should be submitted to QSOG_Hospital@cms.hhs.gov.

Effective Date: This policy should be communicated to all survey and certification staff, their managers and the State and Regional Office training coordinators within 30 days of this memorandum.

/s/
David Wright

Director

cc: Survey & Operations Group Management