

# **Federal Oversight of QIS: Conducting Quality Improvement Calls with State Survey Agencies**

June 2015

# **Conducting Quality Improvement Calls with State Survey Agencies**

## **Overview of Quality Improvement Activities**

This document describes the quarterly quality improvement activities that should be conducted by Regional Office QIS surveyors. This component of the federal oversight process uses the Desk Audit Report for the Regional Office (DAR-RO). The RO evaluator uses the State-Specific DAR-RO (a version of the DAR-RO that contains data for a single state) to conduct a QI call with the SA. (At this time, both the RO and SA receive these reports from the University of Colorado). The goal of QI calls is to foster communication about issues of concern and outlier values on the desk audit report and address sources of QIS inconsistency. Through the quarterly QI calls, the RO evaluator facilitates the SA understanding and effective use of the desk audit report data so that the reports and data become effective tools for managing SA surveyor and SA team consistency.

In addition to receiving the quarterly State-Specific DAR-RO, the SA receives DAR-SA reports throughout the quarter and those reports contain six additional items and details on SA surveyor performance. The SA is expected to review the DAR-SA reports as they are received, and identify and address outliers. When the State-Specific DAR-RO is received and the QI call is held, the RO evaluator expects that the SA will provide updates and explanations for each of the outliers.

The State-Specific DAR-RO includes comparative data on 25 items at the national, regional, state, and district office (if applicable) level. Items with regional, state, or district office outliers (compared to the national value) are highlighted on the report.

The outcome of the calls should be documented since some of the information (i.e., low outliers related to Items 2&19, 5, and 12) will be used when completing offsite preparation for a Federal Oversight of a Quality Indicator Survey (FOQIS).

## **Preparing for the QI Call**

The RO evaluator should review the State-Specific DAR-RO and identify areas for discussion on the quarterly call with the SA. These areas include outliers, if any, for the items identified on the report. In preparation for the QI call, the RO evaluator's review should include comparisons with prior DAR-ROs to identify trends in outliers over time. The intent of the QI call is to facilitate communication between the RO and the SA in order to identify concerns and discuss possible solutions or interventions for those issues under discussion. Refer to the "Use" column of the Desk Audit Report for the Regional Office Instruction Guide for guidance about possible explanations or reasons for all identified issues. At this time, the University of Colorado identifies the ranges for these outliers.

Use the outliers identified in the “Notes” field on the State-Specific DAR-RO as the agenda for the QI call. The “Notes” field under each item identifies all outliers of concern from that quarter. The SA should be prepared to address four key questions during the QI call for each identified outlier:

1. Is the SA aware of the outlier?
2. Can the SA identify the cause or provide an explanation for the outlier?
3. If the outlier is a concern, what is the SA doing to address the concern?
4. Has the SA determined the effectiveness of interventions undertaken to address the concerns?

## **Conducting the QI Call**

### Discussing High and Low Outliers

It is important to note that an outlier does not automatically indicate errors by surveyors or in the survey process, but further investigation of the outlier is needed in order to determine the reason that the outlier occurred. When discussing outliers, ask the SA to look at the issue across a number of reports. Does the outlier consistently appear as an outlier on multiple desk audit reports? Are the outliers or variations due to differences in the implementation of the survey process? It is important for the SA to identify the cause of all outliers and to provide a definitive reason for those variations. If the cause of the variation is because one geographical area conducts investigations or interprets findings differently, the SA should determine if there is a need for improvement and implement, as appropriate, monitoring and/or corrective actions for the SA surveyors. If high outliers are identified, and after review, the SA determines that the survey process is being appropriately implemented, no corrective action is necessary.

### Discussing Severity and Scope

During discussions of severity and scope, it is important for the SA to explain why certain levels of severity and scope are appearing as high or low outliers. For example, CMS does expect a low rate for level “A” deficiencies so if a SA is high in level “A” deficiencies, it is important for the SA to review a sample of the A-level deficiencies to determine whether each deficiency was at the appropriate level of scope and severity. For example, should an “A” level deficiency actually have been a “D” level deficiency. If there are high outliers for widespread deficiencies, the SA should identify whether the surveyors have identified non-compliance as widespread and not a subset of residents affected by the noncompliance in the facility.

### Discussing High Citation Rates

During discussion of high citation rates, the SA should have conducted a review of a sample of these deficiencies in order to determine whether the deficiencies were cited at the appropriate F-tag level or reflect an inappropriate focus by a geographical area or SA team. If the citations are appropriately cited deficiencies, and are not localized to a particular area, these deficiencies would not reflect a survey process problem.

### Discussing Variation

The RO evaluator should not offer suggestions as to why a variation may or may not have occurred but rather the SA should identify the causal factors and plans to remedy or address variation. The SA, having received the DAR information prior to the QI call, should have conducted the investigations on the outliers and should be able to provide explanation for the outliers.

The RO should ask the SA for clarification about SA statements that may reflect a variation in the way the survey process or regulations are implemented. For example, a SA may indicate that the SA cites QA&A only if substandard quality of care is found. In this case, the RO should clarify that the QA&A guidance and the intent of the regulation is that the facility have a functioning committee that reviews all quality deficiencies, not just deficiencies that rise to the level of substandard quality of care.

## **Concluding the QI Call and Subsequent Steps**

At the conclusion of the call, the RO evaluator ensures the SA addresses all issues and concern raised by the RO evaluator. The RO evaluator also informs the SA that the RO will review the next DAR-RO to see if there is noted improvement in problem areas. If the RO evaluator identifies concerns with the SA team's performance that are related to a low outlier for Items 2&19, 5, and 12, the RO evaluator addresses the FOQIS findings (if available) and SA action during the next QI call.

## **Offsite Preparation for the FOQIS**

It is important the RO evaluator maintains a list of concerns from Items 2&19, 5, and 12 that the RO evaluator plans to evaluate during the FOQIS.

If a concern was discussed with the SA during a call and the SA indicated that corrective action had been taken for any low outlier for Items 2&19, 5, and 12, the RO evaluator should assess the effectiveness of the corrective action during the FOQIS.

## Overview and Timing of the Process

1. Throughout each quarter, the SA reviews multiple DAR-SA reports to identify and address outliers before receiving the State-Specific DAR-RO.
2. At the end of each quarter, the RO receives a DAR-RO that displays data for each QIS state in the region. The RO evaluator uses this report to identify consistency across the region and QIS states compared to the national average. This report is for internal-RO use only.
3. At the end of each quarter, the RO and SA receive the State-Specific DAR-RO.
4. The RO evaluator conducts the Quality Improvement call within four weeks after receipt of the State-Specific DAR-RO to the SA. Ideally, QI calls should be conducted after receipt of each DAR-RO, but resources and schedules may dictate less frequent calls.