



Center for Clinical Standards and Quality/Survey & Certification Group

Admin Info: 16-02-ASC

DATE: October 9, 2015

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Confidential Lists of Non-Deemed Ambulatory Surgical Centers (ASCs)
Randomly Selected for Survey and Submission

Memorandum Summary

- ***Non-deemed ASC Survey Samples:*** For fiscal year (FY) 2016, all State Survey Agencies (SAs) are required to survey:
 - Twenty five percent (25 percent) of non-deemed ASCs, and
 - A ten percent (10 percent) randomly selected ASC sample, selected by the Centers for Medicare & Medicaid Services (CMS), as part of the overall requirement to survey 25 percent of all non-deemed ASCs.These ASCs must be surveyed no later than September 30, 2016.
- ***Deemed ASC Validation Surveys:*** SAs must also conduct representative sample validation surveys of deemed ASCs selected by CMS. These surveys must be conducted no later than 60 calendar days after the completion of the accrediting organization's (AO's) survey.
- ***FY 2016 Infection Control Surveyor Worksheet submission:*** For FY 2016, SAs are required to submit completed Infection Control Surveyor Worksheets only for the ten percent randomly selected sample of non-deemed ASCs and all representative sample validation surveys of deemed ASCs. The worksheets should be sent directly to CMS' Contractor, Abt. Associates.
- ***Distribution of Survey Lists:*** Regional Offices (ROs) will distribute confidential lists of the sample of ASCs which must be surveyed to each SA shortly, to facilitate efficient scheduling.

To help strengthen the Department of Health and Human Services (DHHS) efforts aimed at protecting patients from healthcare-associated infections in ambulatory care settings, CMS in FY 2016 is resuming collection of data on ASC infection control practices identified on the ASC Infection Control Surveyor Worksheet. Consistent in response to a recommendation from the Government Accountability Office¹, we are continuing a periodic, limited data collection of Worksheets for a randomly selected sample of non-deemed ASCs.

¹ *Patient Safety: HHS Has Taken Steps to Address Unsafe Injection Practices but More Action is Needed*, Government Accountability Office, GAO-12-712, July, 2012.

For FY 2016, CMS has selected a random 10 percent sample of non-deemed ASCs in each State which must be included in the SA's required 25 percent targeted sample. CMS Central Office (CO) will provide each RO confidential lists of the randomly selected sample of non-deemed ASCs for each State in the region. ROs in turn will distribute promptly to each SA the applicable non-deemed ASC random sample list for that SA. This will facilitate SAs' efforts to schedule these surveys in an efficient manner. SAs are to limit the distribution of these lists, in order to preserve the unannounced nature of the surveys of the listed ASCs.

SAs will also perform representative sample validation surveys on deemed ASCs. The ASCs surveyed will be selected by CMS based on the accreditation survey schedule of deemed ASCs that are surveyed by AOs in FY2016. SAs must also submit completed Infection Control Surveyor Worksheets for all validation surveys of deemed ASCs.

SAs will send to CMS' Contractor, Abt Associates, the completed Infection Control Surveyor Worksheet **only** for those ASC surveys of facilities included in the CMS-specified random sample as well as the completed Worksheets for all representative sample validation surveys of deemed ASCs. SAs must **not** send Abt Associates any ASC Worksheets that were not included in the assigned samples of deemed and non-deemed ASCs.

Electronic submission: SAs will submit Worksheets electronically via the secure Fluid Survey website through Abt Associates. There are two options for electronic completion:

1. SAs will have surveyors fill out applicable portions of paper copies of the worksheet while on site, then compile their findings into one worksheet for electronic submission in the office; or,
2. Those SAs with laptop or tablet capabilities have the option to complete the worksheet via laptop/tablet while on site and then submit electronically once back in the office with internet connection.

Step by step instructions with screenshots on how to complete and submit the worksheet are provided in the attachment to this memo. Training on the electronic worksheet submission process will take place via scheduled webinars in October and announced at a later time. Sessions will be recorded and available for those who are unable to attend as scheduled.

Confidential list distribution: Shortly after issuance of this memorandum, CMS CO will provide each RO confidential lists of the randomly selected samples of non-deemed ASCs for each State. ROs in turn will distribute promptly to each SA the applicable non-deemed ASC random sample lists for that SA.

If the SA believes there are errors on the distributed random sample lists, e.g., a listed ASC cannot be identified, or there are questions about its non-deemed status, or the ASC no longer participates in the Medicare program, the SA may contact the RO or CO. The RO will work with CO to resolve the questions. CO will only substitute new ASC selections for those in the sample if an ASC is no longer participating in Medicare, is currently on a termination track, or has been awarded deemed status. CMS recognizes that the sample may include recently surveyed ASCs, but will continue to include them to preserve the representative nature of the sample.

We appreciate the diligence of States in the ASC surveys, as these surveys and the associated worksheets have contributed enormously to improvement in safety and quality for patients.

Contact: Please contact ASCSCG@cms.hhs.gov for any questions.

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/

Thomas E. Hamilton

Attachment: Instruction Guide for ASCs Infection Control Worksheet Offline Version

cc: Survey and Certification Regional Office Management