DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicaid Services 7500 Security Boulevard, Mail Stop C2-21-16 Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality/Survey & Certification Group

Ref: S&C: 15-21-ESRD

DATE: January 16, 2015

TO: State Survey Agency Directors

FROM: Director

Survey and Certification Group

SUBJECT: Use of Invalid End Stage Renal Disease (ESRD) "Temporary" Centers for

Medicare and Medicaid Services (CMS) Certification Numbers (CCN)

Memorandum Summary

The CMS Regional Offices (RO) assign CCNs. No other entity has the authority to assign a CCN.

- CMS learned that ESRD Networks have issued numbers denoted as "Temporary CCNs" to non-certified ESRD facilities. These are not valid numbers. The temporary numbers were issued to enable the non-certified facilities to enter patient data into the CROWNWeb (CW) data collection system.
- CMS instructed the Networks to discontinue issuing these numbers and discontinue entering data into CW using temporary CCNs.

Background

The CCNs are assigned only by the CMS ROs. It has come to the attention of CMS that data from non-certified ESRD facilities in at least 17 States has been entered into the CROWNWeb (CW) data collection system by the ESRD Networks using temporary CCNs which were assigned by the Networks. The invalid numbers were apparently used to enter patient data into CW.

The CCN is assigned to the ESRD facility after all certification requirements have been met and is never assigned on a temporary basis. Procedures for numbering CCNs are located in the State Operations Manual (SOM) revised on 10/3/14, Chapter 2, The Certification Process, sections 2779 – 2779 J. The SOM documents at 2779 A "the RO assigns the CCN and maintains adequate controls." CCNs distributed by any entity other than the RO are invalid.

Page 2 – State Survey Agency Directors

The Networks were informed by CMS on November 4, 2014 to discontinue the issuance of numbers denoted as CCNs and to discontinue the use of "Temporary CCNs" to enter data into CW. No action is required by the CMS Regional Offices. Please email any questions regarding this memorandum to Je'annine O'Malley at <u>Jeannine.omalley@cms.hhs.gov</u>.

Effective Date: Immediately. This guidance should be communicated to all RO and State Survey Agency survey, certification and enforcement staff, their managers and the State/RO training coordinators within 30 days of this memorandum.

/s/ Thomas E. Hamilton

cc: Survey and Certification Regional Office Management