



STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
*Aging and Long-Term Support Administration*  
*PO Box 45600, Olympia, Washington 98504-5600*

March 31, 2020

AL TSA: ICF/IID #2020-007  
**QSO-20-20-AII & NON-LTC PRIORITIZATION OF SURVEY ACTIVITIES  
AND FOCUSED INFECTION CONTROL/PPE REVIEWS**

Dear ICF/IID Superintendent:

**FOCUSED INFECTION CONTROL/PPE REVIEWS**

On March 26, 2020, CMS issued [QSO-20-20-AII](#), directing each state survey agency (SSA) to conduct infection control and PPE reviews, and to use the guidelines provided in the QSO memo to conduct the reviews for ICF/IID facilities.

RCS surveyors will use the guideline attached to the QSO memo, "[COVID-19 Focused Infection Control Survey: Acute and Continuing Care](#)," to complete the review required by CMS and per instruction from Incident Command. RCS will review every ICF/IID facility. The reviews will be on-site, and could occur as a stand-alone inspection or as part of an existing complaint investigation.

Additionally, CMS is disseminating the "COVID-19 Focused Infection Control Survey: Acute and Continuing Care" to facilities, and expects facilities to use the document, in conjunction with the latest guidance from Centers for Disease Prevention and Control (CDC), to perform a voluntary self-assessment. RCS surveyors may request the document during an onsite investigation.

We will not cite for lack of PPE per the direction of the Center for Medicare and Medicaid Services (CMS); however, this information is important for us to report up to the Incident Command.

**QSO-20-20-AII, PRIORITIZATION OF SURVEY ACTIVITIES**

On March 26, 2020, CMS updated their guidance regarding survey prioritization in QSO-20-20-AII. With this memo, CMS superseded QSO-20-12-ALL, "Suspension of Survey Activities."

On Friday, March 13, 2020, President Trump declared a national emergency related to the COVID-19 outbreak. This action permitted CMS to authorize waivers or modifications of certain requirements pursuant to section 1135 of the Social Security Act (the Act). Under section 1135(b)(5) of the Act, CMS is prioritizing surveys by authorizing modification of timetables and deadlines for the performance of certain required activities, delaying revisit surveys, and generally exercising enforcement discretion for three weeks.

Beginning March 20, 2020, CMS is suspending certain federal and SSA surveys, and delaying certain re-visit surveys for three weeks.

- Standard surveys, including the Health, Life Safety, and Emergency Preparedness portions of the survey, are suspended.
- Re-visits to determine compliance that are not associated with an Immediate Jeopardy (IJ) situation are delayed.
- Complaints and Facility Reported Incidents (FRIs) triaged at the IJ level will follow normal protocol and an onsite survey will be conducted within two business days.
- Complaints and FRIs triaged at the non-IJ level will be logged, but an onsite survey will not be conducted until after the three-week prioritization period.

- For facilities cited for deficiencies at an IJ level, and if surveyors have not verified the IJ has been removed, an on-site re-visit will proceed as normal.

Enforcement for ICF/IID facilities, including Plans of Correction, Denial of Payment for New Admissions, and termination proceedings will be suspended in some circumstances.

If an onsite survey was started prior to the prioritization period and does not fall under guidance in the QSO memo, survey teams will end the survey and exit the facility. Initial certification surveys remain authorized to increase the health care capacity.

CMS clarified that other providers who are providing direct care to residents (such as hospice or home health), in general, should not be restricted from entering an ICF/IID facility, provided they are appropriately wearing PPE, and meet other screening criteria.

CDC recommends facilities notify the local health jurisdiction about residents with severe respiratory infection or a cluster of respiratory illnesses. In Washington State, the state Department of Health requires reporting of known or suspected cases of COVID-19.

CMS will continue to evaluate the survey prioritization to determine if they need to continue this past the initial three weeks. Later, CMS will provide guidance on how delayed surveys and complaints will be handled.

This memo is effective immediately. If you have questions about the QSO memo, please address your questions to [QSOG\\_EmergencyPrep@cms.hhs.gov](mailto:QSOG_EmergencyPrep@cms.hhs.gov).

Thank you for your continued commitment to resident health and safety. If you have any questions, please contact Shana Privett, ICF/IID Policy Program Manager, at [Shana.privett@dshs.wa.gov](mailto:Shana.privett@dshs.wa.gov) or at (360) 764-7903.

Sincerely,



Candace Goehring, Director  
Residential Care Services

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