

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

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June 7, 2018

ALTSA: ICF/IID #2018-007 SURVEY PROTOCOL REVISION

Dear ICF/IID Superintendent and/or Administrator:

The Centers for Medicare/Medicaid Services (CMS) revised the survey protocols for Surveyors who conduct ICF/IID surveys. Residential Care Services has received CMS Memo QSO-18-16-ICF/IID stating the State Operating Procedure (SOM), Appendix J was amended on 4/13/2018 and is currently in effect. View the QSO memo / View Appendix J

There were no changes to the Conditions of Participation (CoP) or the individual regulations. Only the survey process was changed.

The Survey Protocol revision includes three types of surveys:

- 1. Focused Fundamental Survey: The survey team conducts tasks one through three (see below for a list of the tasks*). This survey narrows the focus to 27 Key regulations. If the Key regulations are in compliance, no additional regulations will be looked at. However, if a Key regulation is found out of compliance, the survey process directs additional regulations to be reviewed. These additional regulations are referred to as Cascading regulations. In addition to the above changes, the Sample Selection process has been changed, with a different set of selection criteria to be used. (These changes can be found in the attached Appendix J internet site.) Materials such as Individual Program Plan/Individual Habilitation Plan (IPP/IHP), Comprehensive Functional Assessment (CFA), etc. will be requested of the facility once the sample is selected. Observations and interviews will be focused on how the facility is implementing the IPP/IHP with the Client.
- 2. **Extended Survey**: If during the course of a Focused Fundamental Survey, the survey team determines the facility is not compliant with a CoP, the team will then review all regulations comprising the CoP. This determination of non-compliance with a CoP and the subsequent review of all of the regulations under that CoP changes the Focused Fundament Survey into an Extended Survey.
- 3. **Full Survey:** Occurs when an Immediate Jeopardy (IJ) is identified and/or when noncompliance occurs with one or more of the following CoPs: Client Protections, Client Behavior and Facility Practices, or Health Care Services. The full survey would then consist of a review of all of the regulations in all eight of the CoPs.

*Tasks for Surveyors to complete (protocols require an entrance conference):

- Entrance.
- Task 1 Sample selection.
- Task 2 Review of Facility Systems to prevent abuse, negligent/mistreatment and how the facility resolves complaints.
- Task 3 Focused observation.
- Task 4 Required interviews with Individuals, family/advocate and direct care staff.
- Task 5 Drug pass observation.
- Task 6 Visit each area of the facility serving certified individuals.
- Task 7 Record review of Individuals in the sample.
- Task 8 Exit Conference.

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Upon arrival to the facility for a survey, the following information should be immediately available for the survey team:

- A census of the Clients at the facility
- Admissions to the facility within the last six months
- Clients participating in a day program
- Clients who have a medication self-administration program
- Hospitalizations within the last six months
- Emergency Room visits within the last six months •
- Policies prohibiting abuse, neglect and mistreatment
 - Policies delineating facility systems for preventing and detecting abuse, neglect and mistreatment
 - Systems for addressing injuries of unknown source
 - Information compiled and analyzed on accidents, incidents, allegations and investigations
- Key personnel and phone numbers •
- Day program providers and phone numbers •
- Schedule of medication times and meal times •
- List of clients who receive drugs to manage behavior
- List of clients whose IPP/IHP include physical restraints to manage behavior •

Once the Client Sample is selected, copies of the following documents for each Client will be needed quickly:

- IPP/IHP for each Sample Client
- CFA for each Sample Client
- All related data and analysis for objectives from each IPP/IHP

Thank you for your continued commitment to resident health and safety. If you have any questions, please contact your local RCS Field Manager, Gerald Heilinger at 360-725-2484 or Policy Program Manager, Shana Privett at 360-725-2382.

Sincerely.

Candace Goehring, Director

Residential Care Services

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