



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

March 11, 2019

ALTSA: ICF/IID #2019-003
APPENDIX Q REVISION

Dear ICF/IID Superintendent and/or Administrator:

Immediate jeopardy is a situation in which a recipient of care has suffered or is likely to suffer serious injury, harm, impairment or death as a result of a provider's, supplier's, or laboratory's noncompliance with one or more health and safety requirements. Immediate jeopardy represents the most severe and egregious threat to the health and safety of recipients, as well as carries the most serious sanctions for providers, suppliers, and/or laboratories.

The Centers for Medicare and Medicaid Services (CMS) provides guidance to surveyors for citing immediate jeopardy in Appendix Q of the State Operating Manual (SOM). On March 5, 2019, CMS released a memorandum, [QSO19-09-ALL](#), announcing the revision of Appendix Q in order to clarify and increase consistency for identifying immediate jeopardy. These revisions apply to all provider and supplier types.

- **Core Appendix Q** - The revision creates a Core Appendix Q that will be used by surveyors of all provider and supplier types in determining when to cite immediate jeopardy.
- **Key Components of Immediate Jeopardy** – To cite immediate jeopardy, surveyors determine that (1) noncompliance (2) caused or created a likelihood that serious injury, harm, impairment or death to one or more recipients would occur or recur; and (3) immediate action is necessary to prevent the occurrence or recurrence of serious injury, harm, impairment or death to one or more recipients.
- **Immediate Jeopardy Template** – Appendix Q now includes a template to assist surveyors in documenting the information necessary to establish each of the key components of immediate jeopardy. Survey teams must use the template to convey information to the surveyed entity.
- **Training** - Online basic training for Core Appendix Q is available on the Integrated Surveyor Training Website at the following link: <https://surveyortraining.cms.hhs.gov/>. This basic training, called Immediate Jeopardy Update Training, is for surveyors and other state agency staff, as well as providers, suppliers, laboratories, and other stakeholders.

For questions related to this information, please add in subject line "Immediate Jeopardy Inquiry" and send your email to: QSOG_GeneralInquiries@cms.hhs.gov

If you have any questions, please contact Shana Privett, ICF/IID Policy Program Manager, at (360) 725-2382 or shana.privett@dshs.wa.gov.

Thank you for your continued commitment to resident health and safety.

Sincerely,

Candace Goehring, Director
Residential Care Services

DSHS: "Transforming Lives"