



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: NH #2019-007**  
**QSO-19-09-ALL REVISIONS TO APPENDIX Q,**  
**GUIDANCE ON IMMEDIATE JEOPARDY**

Dear Nursing Facility/Home 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.
- **Subparts of Appendix Q** - CMS has drafted subparts to Appendix Q that focus on immediate jeopardy concerns occurring in nursing homes and clinical laboratories since those provider types have specific policies related to immediate jeopardy. For nursing homes, there is additional guidance for surveyors related to immediate jeopardy, including the duration of the noncompliance and past noncompliance. The subpart also includes a table containing examples of facility staff actions and resident outcomes that would trigger further investigation into 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.

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For questions related to this information, please add in subject line "Immediate Jeopardy Inquiry" and send your email to CMS at [QSOG\\_GeneralInquiries@cms.hhs.gov](mailto:QSOG_GeneralInquiries@cms.hhs.gov).

Thank you for your continued commitment to resident health and safety. If you have any questions, please contact Lisa Herke, Nursing Home Policy Program Manager at 509-225-2819 or [lisa.herke@dshs.wa.gov](mailto:lisa.herke@dshs.wa.gov).

Sincerely,



Candace Goehring, Director  
Residential Care Services

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