



Center for Clinical Standards and Quality/Quality, Safety, and Oversight Group

Admin Info: 18-18-Deemed Providers/Suppliers

DATE: August 31, 2018

TO: State Survey Agency Directors

FROM: Director
Quality, Safety, and Oversight Group

SUBJECT: Validation Survey Attestation Procedures for Fiscal Year (FY) 2018

Memorandum Summary

- **Validation Survey Attestation Process:** The Centers for Medicare & Medicaid Services (CMS) will employ an attestation process for FY 2018 to Reporting and Supplemental Budget Allocations to ensure that State Survey Agencies (SAs) are paid for hospital, Psychiatric Hospital, Home Health Agency (HHA), Hospice and Ambulatory Surgical Center (ASC) supplemental validation surveys conducted in FY 2018.
- **Timeframes for Attestation:** SAs must submit an attestation to their CMS Regional Office (RO) **no later than September 14, 2018** indicating, for each provider/supplier type, the number of supplemental validation surveys assigned that have not yet been reported to CMS as completed as of August 21, 2018, but for which the SA guarantees that it has already or will complete the on-site portion of the survey on or before September 30, 2018. Other standard validation survey requirements must also be met.

Background

Timely completion of all assigned deemed status provider/supplier validation surveys, whether they are funded through SA base budgets or supplemental payments, is essential to CMS' oversight of national accrediting organizations. As of August 21, 2018, the RO monthly validation report indicates that a significant number of the assigned supplemental validation surveys remain to be completed by the SAs:

Program Type	Supplemental Validation Surveys Assigned	Supplemental Validation Surveys Reported as Complete	Outstanding Supplemental Surveys
Hospitals	32	19	13
Psych Hospitals	21	20	1
HHAs	73	62	11
Hospice	34	33	1
ASCs	74	64	10

CMS generally pays the SAs for supplemental validation surveys only after evidence of completion of the survey. However, due to end of the FY timing constraints and in order to ensure that SAs actually receive all supplemental payments they are entitled to, CMS is, as in prior years, using an attestation process as the basis for the final FY 2018 supplemental payments. **The attestation is required only for those supplemental validation surveys that have not been reported as complete as of the August 21, 2018 RO validation report.**

SA Attestation

CMS will pay SA's for FY 2018 supplemental validation surveys assigned, but not yet completed as long as:

- The SA submits an attestation (see attached) that it will complete the on-site portion of the supplemental validation survey no later than 60-days after the AO survey end date, which in all cases must be **prior to September 30, 2018.**
- The SA attests that it will complete for each supplemental validation survey the CMS-2567 in ASPEN Central Office (CO) for RO review and subsequent timely upload, but **no later than November 30, 2018.**
- The SA attestation must list the facility name, CMS Certification Number (CCN), provider type, scheduled SA survey date, and a statement that all conditions outlined above will be met by the SA, as appropriate.
- The SA attestation must be completed in its entirety, signed and forwarded electronically to the RO **no later than September 7, 2018.**

RO Role

Notify affected SAs of their need to submit a completed attestation to the RO no later than September 7, 2018. CO will provide each RO with a list of affected SAs, including the assigned validation surveys not reported as completed or which were assigned on August 5, 2018.

- Review the submitted SA attestations for accuracy and completeness;
- Initial the attestation form and forward an electronic copy to the CO Accreditation mailbox at SCGAccreditationCO@cms.hhs.gov **no later than September 14, 2018;**
- Log the SA reported planned dates for the SA supplemental surveys on the monthly RO Validation Survey Activity reports. All supplemental validation samples selected in FY 2018 must be included if not previously reported as complete on the RO monthly Validation Survey Activity report; and,
- Monitor that these surveys and all associated required actions are completed timely.

As a reminder, CMS CO releases the monthly validation sample selections by the 5th of each month to the ROs. All validation surveys must be authorized by the RO on the appropriate Form CMS-2802 immediately upon receipt from CO of the monthly validation sample selection. **All** validation survey activity for hospitals, critical access hospitals, HHAs, and ASCs must continue to be reported by the ROs on the monthly Validation Survey Activity report that is due to CO by the **21st of each month.** This report is the primary method used by CO for monitoring the progress of the validation survey program.

As part of this report, the RO must include the date of ASPEN entry of the validation survey outcome. This date should be entered as soon as the RO issues the notice to the facility of the validation survey findings. The survey is not considered final until the ASPEN upload is completed.

A copy of all validation survey Form CMS 2567s and associated letters sent to the provider or supplier by the RO must also be uploaded into the Validation SharePoint site by the RO promptly, to enable analysis and comparison of the results with the AO surveys.

Contact: Please forward any questions concerning the contents of this memo to the Central Office Accreditation mailbox at SCGAccreditationCO@cms.hhs.gov.

Effective Date: Immediately. This information should be communicated with all survey and certification staff, their managers and the State/Regional Office training coordinators within 30 days of this memorandum.

/s/

David R. Wright

Attachment: State Survey Agency Attestation

cc: Survey and Certification Regional Office Management

STATE SURVEY AGENCY ATTESTATION

COMPLETION OF SUPPLEMENTAL VALIDATION SURVEYS

State of _____

The Centers for Medicare & Medicaid Services (CMS) will pay for FY 2018 supplemental surveys assigned to a State Survey Agency (SA), but not yet uploaded into ASPEN, as the SA attests that:

1. It will complete the on-site portion of the supplemental validation survey no later than 60 days after the accreditation organization survey, which in all cases will be prior to September 30, 2018;
2. It will complete for each supplemental validation survey the Form CMS-2567 and upload it into ASPEN for RO review in a timely manner, but no later than November 30, 2018.
3. For hospital and Home Health Agency (HHA) supplemental surveys, the SA has already, or will by September 30, 2018, complete at least the on-site portion of all validation surveys assigned through August 5, 2018 as part of its base budget workload.

Provider/ Supplier Type	Facility Name	CCN#	Yes, we will meet all 3 conditions	No, we will not meet all 3 conditions	Scheduled SA Survey End Date

Name (please print)

Signature

Title

Date

RO Signature