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Center for Medicaid and State Operations/Survey & Certification Group

Ref: S&C-09-50

DATE: **August 7, 2009**

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Priority Order of Quality Indicator Survey (QIS) National Implementation in States

Memorandum Summary

- **Priorities for National QIS Implementation:** This memorandum provides States with a QIS implementation priority order for remaining States not currently implementing the QIS.
- **Preparation:** Offers guidance to support States' preparation for QIS implementation.

The Centers for Medicare & Medicaid Services (CMS) is implementing the QIS nationally. To date, the implementation of the QIS includes 11 States: Connecticut, Kansas, Ohio, Louisiana, Florida, Minnesota, North Carolina, New Mexico, West Virginia, Maryland, and Washington. The State of Connecticut has fully implemented the QIS and the other ten States are in various stages of QIS training and implementation. Training in the QIS starts this summer in Delaware, Maine and Vermont and QIS training is scheduled to begin in Georgia and Arizona early this winter.

Authority –The 1864 Agreement is the agreement between CMS and the State survey agency to carry out the provisions of Sections 1864, 1874, and related provisions of the Social Security Act. Article II of the 1864 Agreement specifies the functions to be performed by the State. Article II, A.1. (c), reads that the State is "responsible for surveying for the purpose of certifying to the Secretary the compliance or non-compliance of providers and suppliers of services and resurveying such entities, at such times and manner as the Secretary may direct." Thus, the 1864 Agreement provides CMS with the authority to designate the content of the survey process to be followed by States. Further, CMS has included the QIS process in its State Operations Manual as an official survey of record to determine a nursing home's compliance with Federal requirements.

Priority Order - Attachment A provides a general QIS implementation order for the remaining non-QIS States so that States have a general expectation of the timing for QIS training and implementation to better prepare for the QIS training activities. As the funds CMS receives to support QIS training could fluctuate, the number of new States trained in each contract period could vary accordingly. There are six implementation bands at this time. For band 1, CMS is beginning QIS training in Delaware, Maine, and Vermont in summer 2009; QIS training in Georgia and Arizona is scheduled to begin in early winter of 2010. Training for States in band two can be expected to begin in late 2010 or early 2011.

Any State may request at any time that CMS consider an earlier QIS implementation. All States should plan their equipment refreshment strategies to ensure the availability of tablet PCs and technical support.

Preparation for QIS Implementation – Attachment B provides information to assist State survey agencies to facilitate preparation for QIS training and implementation. This information is intended to enhance State understanding of the commitment and resource requirements, time involved, and the equipment necessary to prepare for successful QIS training and implementation. Also, CMS plans to air a satellite broadcast in fall 2009 to provide States with a better understanding of the QIS process and to assist States in planning for QIS training and implementation.

We appreciate the commitment and effort of the current QIS States and we look forward to beginning QIS training in additional States.

/s/
Thomas E. Hamilton

Attachments

cc: Survey and Certification Regional Office Management

Attachment A

Priority Order of States for QIS Implementation

Band One 1. Delaware 2. Maine 3. Vermont 4. Georgia 5. Arizona	**Band Two** 1. Colorado 2. Nebraska 3. District of Columbia 4. Indiana 5. Oregon 6. Utah 7. New York
Band Three 1. Iowa 2. New Jersey 3. Arkansas 4. Hawaii 5. South Carolina 6. Tennessee 7. Oklahoma	**Band Four** 1. Texas 2. Rhode Island 3. Wisconsin 4. Missouri 5. New Hampshire 6. Kentucky 7. Mississippi 8. North Dakota
Band Five 1. Wyoming 2. Alabama 3. Massachusetts 4. Illinois 5. Idaho 6. Virginia 7. California 8. Alaska	**Band Six** 1. Pennsylvania 2. Michigan 3. South Dakota 4. Puerto Rico 5. Virgin Islands 6. Montana 7. Nevada

Attachment B

Preparation for QIS Implementation

The following information is provided so that State survey agencies have a better understanding of the expectations of the State's surveyors to be trained, resources required, time involved, and the equipment necessary to adequately prepare for QIS training and implementation. This compiled information is the result of CMS policy and procedure decisions, conversations with State survey agency management and staff, discussions with CMS contractors who have been involved in the QIS development and/or training, and our own awareness based on those times when something unforeseen does indeed happen. We hope that States implementing the QIS in the future will benefit from the experiences of States who are currently implementing the QIS and find the following information helpful to them.

Information Gathering

Background information that is useful in educating staff about the QIS includes a variety of sources containing information that CMS has issued about the QIS process. This includes:

- S&C-08-21 includes a brochure that provides a general overview of the QIS process.
- Chapter 4 of the State Operations Manual (§4009) is updated with QIS information.
- Current Survey and Certification Mission & Priority Document (MPD)
- QIS-IT related memos are posted at https://www.qtso.com/
  (Select "QIS" from the left side panel near top and it will take the user to the QIS pages. Then, select "QIS memos.")

Also, States planning to implement QIS can learn a great deal by speaking with current QIS States about their successes and challenges in conducting QIS training.

Developing a QIS Training and Implementation Schedule

Determining the rate at which the QIS training of all nursing home surveyors in the State can occur depends on several factors including: the number of State QIS trainers available to conduct training; the total number of nursing home surveyors to be trained in the State; and, the availability of Tablet PCs and other equipment for surveyors. A State considers all of the relevant factors and duration of the training activities (as described below and in Chapter 4 of the State Operations Manual) in developing its implementation plan. The State's QIS training cycle is repeated until all State surveyors successfully complete the QIS training.

Overview of the QIS Training Protocol

A comprehensive description of the QIS training protocol is contained in S&C-08-14. Following is a brief overview of the training process so that States can understand the intensity and rigor of the QIS training process and the importance of thorough preparation.

States will plan and conduct their own computer training for each group of surveyors to be trained in QIS about one to two weeks prior to the formal QIS classroom training. This training should include creating and naming folders, locating files stored on the tablet PC, understanding the tablet PC functions, using a flash drive, importing and exporting files between the tablet PC

and the flash drive, connecting and using the printer, completing QIS forms on the tablet PC, and restoring the QIS tool. (CMS provides training slides to assist new States with preparing surveyors for QIS training but because there are some unique requirements in every State, the CMS slides only cover the basics.)

CMS expects that a State complete training to fully implement the QIS process to survey nursing homes within three years. Larger States may need three years; smaller States will need less than three years. Surveyors trained in the QIS who become "Registered QIS Surveyors" no longer survey using the traditional survey process but continue to use the QIS process to survey nursing homes.

The QIS training process has classroom and fieldwork components and a total training time of four weeks for each group of surveyors trained (excluding any remediation training that may be necessary). All of the components must be met and the compliance of those surveyors trained is assessed. If surveyors do not achieve mastery of the QIS, remediation will be required with a possible expense to the State.

In terms of preparing for the QIS training process, States select an initial core group of surveyors (two survey teams of four) for QIS training and select surveyors who are:

- Experienced with a minimum of two years of recent long term care (LTC) survey experience and who have received a passing score on the SMQT;
- Able to conduct all aspects of the QIS process (see detailed explanation below);
- Strong leaders and/or trainers as the State's future QIS trainers will be selected from the core surveyors initially trained;
- Proficient with tablet personal computers and are comfortable learning how to use new technology. (The QIS process involves the extensive use of tablet personal computers to collect interview and observation data using handwriting recognition technology and to execute other survey tasks);
- Able to participate in periodic conference calls with CMS and its contractors; and
- Willing to travel within the State as needed to complete QIS surveys, recognizing that travel will depend on the location of selected surveyors and survey sites.

As the State configures the initial survey teams for training (classroom and field training) the State must consider travel time, survey team compatibility, etc. as surveyors will be spending four weeks of training together and additional weeks of conducting QIS surveys together.

All surveyors who conduct QIS surveys must conduct all aspects of the QIS process. In the traditional nursing home survey process, some States have surveyors who only survey physical aspects of the nursing home and do not conduct aspects of the survey related to resident care observations, interview and record review. Likewise, some clinical surveyors do not conduct survey tasks related to the non-clinical aspects of the survey process, such as personal funds, etc. However, the QIS process relies on the ability of every QIS surveyor to conduct all aspects of the survey process (except those observations, specified in Appendix P that must be completed by a licensed nurse, physician's assistant or a physician and the medication pass which is conducted by a nurse or pharmacist.) Thus, if the State has surveyors who do not complete all aspects of the standard survey process, and these surveyors will be conducting QIS surveys, the State has the responsibility to fully prepare and train these nursing home surveyors in all aspects of the nursing home survey process <u>before</u> the QIS training begins in the State to assure the surveyors

will be successful in the QIS training. It is the responsibility of the State to mentor, educate, and prepare their surveyors to be full participants in the QIS process. In some cases, surveyors who previously only completed Module A of the Surveyor Minimum Qualification Test (SMQT) will need to retake the current SMQT which is no longer divided into clinical and non-clinical modules. Although surveyors are not required to take the SMQT prior to the QIS training, they must be able to conduct all portions of the QIS survey as noted above, and all surveyors who conduct nursing home surveys must complete and pass the SMQT to survey independently. For reference, please see S&C-03-06 and S&C-03-28.

As described in Chapter 4 at §4009F of the State Operations Manual, implementation of the QIS process in a State does not replace or alter the requirements that a newly employed surveyor must be oriented to the nursing home survey process. The QIS training process does not provide a review of the regulatory requirements or the interpretive guidance, nor does it instruct a surveyor in how to conduct investigations, interviews, or observations. While the QIS does provide pathways to guide investigation, the State must provide basic orientation and training on these elements for surveyors prior to their participation in the QIS training. It is expected that a newly hired surveyor would have received orientation and observed several QIS surveys, under the direction of a registered QIS surveyor who has passed the SMQT, prior to attending the QIS training. Adequate State orientation and preparation of newly hired surveyors can facilitate successful QIS training for these individuals and thus avoid failure and repeating the QIS training at a future time at the State's expense.

The State's trainers are selected from the initial group of surveyors trained in QIS. Trainer preparation includes completing at least four additional QIS surveys of record for a total of six QIS surveys before the formal process begins. The State QIS trainers-in-training are required to:

- Participate in a Train-the-Trainer Workshop;
- Lead and facilitate classroom sessions;
- Monitor and instruct the next group of surveyor-students during a mock survey;
- Provide feedback and oversight to surveyor-students during surveys of record; and
- Complete a QIS compliance assessment of each surveyor-student.

The CMS training contractor observes, instructs, monitors, and evaluates trainers-in-training delivering classroom training, observing, monitoring, and evaluating the mock survey, and conducting the first compliance assessment of surveyor students.

After successful completion of training, the State's QIS trainers are responsible to train the remaining surveyors in the State. Depending on the geographic size of the State and the number of surveyors to be trained, the State's QIS trainers (referred to as CMS-Certified QIS Trainers) will be completing a considerable amount of traveling to conduct four week blocks of QIS training for each group of approximately eight surveyors.

If a State plans that their State Training Coordinator would be one of their QIS trainers, the State Training Coordinator must participate as a student in the initial core group of surveyors to receive QIS training conducted by the CMS training contractor.

State Management/Oversight

State management and supervisory expertise and oversight are required to facilitate the QIS implementation process. At the beginning of QIS implementation the State is asked to identify a QIS State lead. In some QIS States, the manager is also the State QIS lead and in some States these responsibilities are separated.

The State's QIS lead is expected to:

- Make supervisory decisions and provide oversight for the surveyors, support the QIS process, and assume an active role in overseeing QIS implementation in the State;
- Be able to devote the time to participate directly in both classroom training and onsite QIS training alongside the State's surveyors in the field during training and after;
- Achieve mastery of the QIS to understand the rich survey data generated from QIS;
- Manage potential challenges from nursing homes;
- Serve as a point of contact for the SA for discussion with CMS and/or its contractors;
- Develop and participate in general presentations (provider and consumer organizations) explaining the QIS process and the manner in which the implementation will be conducted; and
- Collaborate in the planning and preparatory activities with the training contractor.

Assuring Information Technology (IT) Support

Recognizing that States vary in how their IT departments are structured, it will be important for the State survey agency to have advance discussions with their IT staff to assure IT commitment and ongoing support to the QIS implementation process. Each State implementing the QIS must identify a dedicated QIS IT lead. The QIS utilizes the QIS Data Collection Tool (DCT) software. Experience has taught us that to support the QIS process, the QIS IT lead benefits from participating in the QIS Classroom training and additional QIS field experience. The State's QIS IT lead must be available immediately, as needs dictate, either onsite at the nursing home or by telephone to support the QIS training activities conducted in the field. The QIS IT lead is the first line of support to surveyors and is proficient with the ASPEN suite of products, ASE and ACO. The State has the responsibility to assure that the technical staff recognizes the degree of surveyor support that may be necessary, the timely equipment purchases required so that each surveyor has a tablet PC and accessories for QIS training and the IT staff is available on an ongoing basis thereafter. The QIS software must be loaded and tested on the surveyors' tablet PCs before the QIS classroom training begins. In some QIS States, the QIS IT lead conducts the prerequisite computer training for surveyors.

Logistical Details

- Each State must furnish each surveyor to be trained in QIS with a Tablet PC and each survey team will need one portable printer to share among the team. Each surveyor will need a flash drive and carrying case. The State is responsible for providing supplies for the printer and maintenance for the equipment. (States are advised to review the most recent CMS' Mission and Priority Document before purchasing equipment.)
- States need to consider the training room accommodations for the QIS classroom to assure a comfortable learning environment (such as, room and table size, temperature, etc.).

- To the degree possible, States need to select nursing homes for the QIS mock surveys and surveys of record that minimize travel time for surveyors. In addition, States need to select nursing homes that do not have a history of serious care issues. The QIS training surveys usually require additional time until the surveyors learn the QIS and therefore it is preferable for surveyors to learn in a facility that is not likely to have many serious issues to be investigated.
- To the maximum extent possible, State teams need to be equipped and prepared to integrate into team processes any CMS regional office staff who are participating in QIS training, embedding with State teams, or conducting onsite Federal oversight of the QIS (FOQIS).
- Each State plans how it will educate its stakeholders about the QIS. Most QIS States have posted QIS information on the State's Web site and some States also have conducted in-person education for their stakeholders. The CMS training contractor will work with each State to schedule and participate in a call to educate stakeholders about QIS.
- Each State must plan how the electronic QIS information will be stored in the State.
- The tracking of surveyor completion of QIS training is entered into the CMS Learning Management System (LMS) and the State determines who will complete the data entry.