MEMORANDUM

Texas Department of Human Services * Long Term Care/Policy

TO: Long Term Care -Regulatory
Regional Directors, State Office Section Managers and
HCSSA Program Administrators

FROM: Marc Gold, Director
Long Term Care Policy
State Office   MC: W-519

SUBJECT: Regional Survey & Certification Letter #01-12

DATE: September 13, 2001

The attached RS&C Letter is being provided to you for information purposes and should be shared with all professional staff.

- RS&C Letter No. 01-12 -- HCFA-670 National Guidance Package; Call Cecile Hay, Professional Services, at (512) 438-2179.

~Original Signature on File~

Marc Gold

Attachment

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August 1, 2001

REGIONAL SURVEY AND CERTIFICATION LETTER NO: 01-12

To: All State Survey Agencies   (Action)
     All Title XIX Single State Agencies   (Information)

Subject: HCFA-670 National Guidance Package
The purpose of this memorandum is to combine all Regional Survey And Certification Letters
(RS&CL) dealing with the HCFA-670 into one Guidance Package. This letter supercedes RS&C
letters 93.22; 93.91; 94.33; 95.08; 95.08A; and 95.33. The State Operations Manual (SOM)
Section 2705 contains the guidelines for the State Agencies to follow. Copies of the form and
instructions are located in the SOM, Exhibit 74.

**The intent of the HCFA-670 is to provide an accurate accounting of the time required for
surveys and specific survey-related activities** for the various provider types participating in the
Medicare/Medicaid/CLIA programs. This will also ensure nationwide consistency in the
reporting process, as well as to simplify surveyor time-keeping responsibilities.

If you have any additional questions/comments on the HCFA-670 reporting practices, please
send to LaDonna Calleia lcalleia@hcfa.gov or call (214) 767-4417.

                    Sincerely,

                    ~Signature on File~

                    Molly Crawshaw, Chief
                    Survey and Certification Operations Branch

Attachment (in .pdf format)
670 Manual

HCFA-670: SURVEY TEAM COMPOSITION
AND WORKLOAD REPORT
<u>NATIONAL GUIDANCE PACKAGE</u>

TABLE OF CONTENTS

I.   **INTRODUCTION**

The HCFA-670 form was designed to capture direct, survey- related time for various provider/supplier types participating in the Medicare/Medicaid/CLIA programs. Data obtained from the HCFA-670 may be considered in formulating survey time parameters for use in future budget allocations.

Recognizing the need to ensure the accuracy of this data and in response to questions/comments received from various States and regions, this guide is offered as an ongoing educational effort designed to enhance the consistency of HCFA-670 reporting practices across the nation.

A breakdown of each block of the form follows. Questions and comments received have been incorporated into each subject section so that this guide may better serve as a quick reference when questions arise.

II. **HCFA-670 FORM**

    A.   **PROVIDER/SUPPLIER NUMBER**

        Self-explanatory

    B.   **PROVIDER/SUPPLIER NAME**

        Self-explanatory

    C.   **TYPE OF SURVEY**

        Enter the applicable survey type code from the list provided on the HCFA-670 form. This field is not entered into ODIE; however, the field may be completed for manual tracking purposes, such as SAEP reviews.

    D.   **EXTENT OF SURVEY**

        Enter the applicable survey extent code from the list provided on the HCFA-670 form. This field is not entered into ODIE; however, the field may be completed for manual tracking purposes, such as SAEP reviews.

    E.   **SURVEYOR ID NUMBER (COLUMN "A")**

        Enter the unique 5-digit HCFA ID number for <u>each</u> surveyor who participated in the survey. The surveyor's name is not required for entry into ODIE but may be required by the State for validation purposes.

EXCEPTION:

> Surveyor ID numbers should <u>not</u> be recorded for those <u>attending but not participating</u> in a survey (e.g., a surveyor in training or a surveyor whose sole function is to observe).

A Surveyor ID number must be assigned to all personnel <u>participating</u> in surveys. These ID numbers may be assigned to supervisors, non-State agency personnel, non-DHSQ personnel and State agency consultants who actually participate in surveys. State or Regional Training Coordinators are responsible for entering surveyor identification information into the OSCAR system as soon as the new surveyor is processed into the State agency or regional office. The OSCAR system then generates the surveyor identification number, numbering the surveyors consecutively, as they are entered into the system. Identification numbers are not assigned on the basis of surveyor credentials or classifications.

When more than 10 surveyors conduct a survey, continuation forms should be used to record the information. (Continuation forms may be accessed by pressing PF8.)

Surveyors working temporarily in another State or region should use their usual surveyor ID numbers on the HCFA-670. The OSCAR system will recognize and accept these surveyors working outside their home State or region. <u>NOTE: This capability is not universal. OSCAR coordinators may verify which regions have been reprogrammed to allow for this capability and, where requested, may reprogram to provide this capability.</u>

F.   **<u>FIRST DATE ARRIVED (COLUMN "B")</u>**

Enter the first date each surveyor arrived on site of the facility/agency. This may or may not be the date of the entrance conference. For example, if the surveyors spend consecutive days at a survey site, the arrival date may be the date of arrival at the hotel. Arrival dates <u>may</u> be different for different members of a team. Enter the date in MM/DD/YY format.

<u>This block is mandatory for all surveys except mail/phone follow-up surveys.</u>

G.   **LAST DATE DEPARTED (COLUMN "C")**

Enter the last date each surveyor was on site at the facility/agency. This may or may not be the date of the exit conference. Departure dates may be different for different members of a team. However, the date entered in this field should reflect the last date each surveyor was on site at the facility/agency, as explained in the following scenario:

> Three surveyors rent hotel rooms from Monday through Thursday, in preparation for a survey scheduled for three days. The survey ended Wednesday. One of the surveyors chooses to depart upon completion of the survey Wednesday evening. The remaining two surveyors spend Wednesday evening at the hotel and depart on Thursday.

The "Last Date Departed" in this scenario is the same for all members of the team. The surveyor who left after completion of the survey Wednesday evening should report the "Last Date Departed" as Wednesday, just as the two surveyors who departed from the hotel Thursday morning should report their "Last Date Departed" as Wednesday. Wednesday is the last date each of the three surveyors was on site at the facility/agency.

A surveyor whose participation in the survey is intermittent should report his or her final day at the facility as the "Last Date Departed" (e.g., if a surveyor arrived on Monday to begin a survey, left the facility Tuesday on another assignment but returned to the first facility to finish on Thursday, Thursday would be shown as the "Last Date Departed"). Enter the date in MM/DD/YY format.

This block is mandatory for all surveys except mail/phone follow-up surveys.

**   Check to verify that the "Last Date Departed" entered on the HCFA-670 coincides with the last date of the survey entered on the survey kit.

NOTE: In the rare case that an interview that would normally be done on-site is conducted over the telephone by a surveyor after the on-site portion of the survey has been completed, do not change the date in this block to reflect the interview date, but do incorporate this time in the "On-Site" block of the form.

************** **GENERAL RULE FOR RECORDING TIME** ***********************
Record all time in quarter hour increments: .25 for 15 minutes/.5 for 30 minutes/.75 for 45 minutes/and 1.0 for 60 minutes. Round all other times off to the nearest quarter hour.
****

H.   **PRE-SURVEY PREPARATION HOURS (COLUMN "D")**

This field is mandatory, for at least one member of the survey team, for all survey types.

Pre-survey preparation hours include a surveyor's time prior to the survey spent reviewing the facility's history or file (file retrieval, organizing materials, etc.) or any telecommunications or conferences directly relating to the survey.

If a pre-survey conference is held to review multiple facilities, time should be divided among the facilities accordingly. **See "DIVIDING TIME" section of this guide.**

DO NOT RECORD:

- Time spent by clerical personnel in retrieving files, organizing materials, etc.

- Time spent on telephone contacts and/or correspondence with prospective providers (initial applicants). Such activity is defined as administrative in nature and not directly survey-related. Complete a HCFA-670 only for surveyor preparation time spent in direct preparation for a survey visit.

- Time spent receiving, recording and logging HHA Hotline calls. Complete a HCFA-670 only to record survey preparation activities by the surveyor who conducts an on-site survey as a result of a home health agency hotline call/complaint.

- Time spent receiving, recording and logging incoming complaints (including routine in-office screening and review of complaints). In-office complaint review should be recorded on the HCFA-670 in this field ONLY by a surveyor preparing for a visit to a facility.

- Time spent by supervisors participating in pre-survey preparation activities.

I.   **ON-SITE HOURS (COLUMNS "E-G")**

On-site time must be recorded for each surveyor. On-site hours would include any survey activity conducted from the start of the entrance conference to the completion of the last survey activity or completion of the exit conference. DO NOT include surveyor meal times as working hours in these columns, unless a surveyor performed survey activities while eating.

NOTE: If a supervisor <u>participates</u> in a survey as a surveyor, his/her on-site time should be recorded in this section, as "on-site hours" (<u>NOT</u> as "Supervisory Review" hours) under the supervisor's surveyor identification number.

If survey work is performed on-site, before the survey is completed but <u>outside the facility</u>, (e.g., the survey is conducted Monday and Tuesday and work is done at the hotel Monday evening) report this time in this section as <u>"On-Site Hours"</u>.

REVISION: If, after completion of the on-site survey, the formal statement of deficiencies is prepared <u>while the surveyor is on-site</u>, include this time in the **"Off-Site Report Preparation"** section. This change is essential to ensuring the true recording of report preparation time. In the "Off-Site Report Preparation" section, we are concerned more with capturing the time required to complete the report than the actual location of its preparation.

REVISION: For home health agencies and hospices, DO NOT include time spent traveling to a patient's home in this field. This time should be reported as actual travel time so that we may capture the escalating costs of travel with respect to home health agencies and hospices.

NOTE: In the rare case that an interview that would normally be done on-site is conducted over the telephone by a surveyor after the on-site portion of the survey has been completed, <u>incorporate this time in the "On-Site"</u> block of the form. <u>Do not change</u> the date in the <u>"Last Date Departed" field</u> to reflect the interview date.

<u>This block is mandatory for all surveys except mail/phone follow-up surveys.</u>

J. **<u>TRAVEL HOURS (COLUMN "H")</u>**

Travel time includes all actual travel to and from a facility and should be reported for <u>each</u> surveyor. The time a surveyor stops during a trip to consume a meal should not be counted as travel time.

REVISED METHODOLOGY: If, on completion of one survey, travel is made directly to another facility, travel hours should be reported using the following methodology:

Reported travel time should reflect actual travel distance, and not double-count actual travel time. Using this logic, two basic scenarios exist:

Scenario #1:

A survey agency is located in "City A". A grouping of 4 facilities is located in "City B", approximately 2 hrs. from "City A". The surveyors travel 2 hrs. from "City A" to "City B" and complete the surveys of the four facilities within "City B", traveling <u>minimal</u> distances between sites. In this instance, travel hours should be shared equally among the four facilities. Total travel time in this instance is 4 hrs. (2 hrs. each way). Therefore, travel should be reported as 1 hr. for each of the four facilities, in order to result in an equitable assignment of time. NOTE: In this instance, travel must be split four ways to prevent the double-counting of travel time and subsequent skewing of travel data.

Scenario #2:

A survey agency is located in "City A". On a given survey date, "City A" surveyors travel to a facility located in "City B", approx. 1 hr. from "City A". Upon completion of the survey in "City B", the surveyors travel to a facility located in "City C", approx. 3 hours from "City A" (2 hrs. from "City B"). After completing the survey, the surveyors travel 3 hours to return to "City A." In this instance, reported travel should be split in a manner more reflective of actual travel time to each facility. Total travel time in this instance is 6 hrs. (3 hrs. each way). The "City B" facility would be assigned 2 hrs. of travel: time taken to travel from "City A" to the "City B" facility (1 hr.) times 2
(1 hr. x 2) - the figure is doubled so that an equitable portion of the return trip is captured. The "City C" facility would be assigned 4 hrs. of travel: time taken to travel from the "City B" facility to the "City C" facility (2 hrs.) times 2 (2 hrs. x 2) - the figure is doubled so that an equitable portion of the return trip is captured.

In addition, travel hours should be divided equally between different survey types. For example, if a follow-up survey is done in conjunction with a complaint survey, the total travel time should be split 50/50 between the two survey types on the two HCFA-670s.

REVISION: For home health agency and hospice surveys, travel to a patient's home <u>SHOULD BE</u> included in travel time, NOT in the "On-Site" section of the form.

K. **<u>OFF-SITE REPORT PREPARATION (COLUMN "I")</u>**

<u>This field is mandatory, for at least one member of the survey team, for all survey types.</u> ODIE requires that a minimum of .25 hrs. be recorded in this field.

Enter the time spent off-site to perform the activities required to produce a report. This would include, among other activities, any time spent reviewing and finalizing the survey packet, surveyors' time spent discussing survey activity during supervisory review, time spent rewriting the report after supervisory review, time spent filling out survey forms and time spent typing the report directly from notes.

REVISION: If, after completion of the on-site survey, the formal statement of deficiencies is prepared <u>while the surveyor is on-site</u>, include this time in the **"Off-Site Report Preparation"** section. This change is essential to ensuring the true recording of report preparation time. In this section, we are concerned more with capturing the time required to complete the report than the actual location of its preparation.

For Federal Monitoring Surveys (FMS), time spent by the regions comparing State and Federal survey results in order to identify differences should be included in this field.

DO NOT INCLUDE:

- Time spent in reviewing Change of Ownership (CHOW) documentation. This is an administrative function which is separate from survey documentation review.

- Time spent on State quality assurance review of surveyor's write-up of deficiencies.

- Time spent rewriting deficiencies based upon regional office review.

- Time spent preparing for a hearing or an appeal.

- Time taken to answer telephone calls from the facility after the survey has been completed (e.g., follow-up questions regarding the Statement of Deficiencies)

    NOTE: In the rare case that an interview that would normally be done on-site is conducted over the telephone by a surveyor after the on-site portion of the survey has been completed, incorporate this time in the "On-Site" block of the form.

L.   **TOTAL SUPERVISORY REVIEW HOURS**

Supervisory review includes all time spent reviewing the survey team's decisions and survey documentation. The supervisory review block should include the time of the person responsible for the supervisory review of the survey report. In some instances, the person responsible for the supervisory review of the report may NOT be an actual supervisor.

If the person responsible for the supervisory review of the report makes deficiency determinations based on the survey documentation, include the time spent reviewing data and making the deficiency determinations. Include all time taken to finalize the survey report and deficiency statement (that of supervisory/non-surveyor personnel or non-supervisory personnel responsible for the supervisory review).

DO NOT INCLUDE:

- Time spent in reviewing CHOW documentation. This is an administrative function which is separate from survey documentation review.

- Time spent on State quality assurance review of surveyor's write-up of deficiencies.

- Review time spent by people other than the survey team for quality assurance monitoring.

- Supervisory time for individual surveyor performance review.

- Involvement of anyone regarding anything other than finalizing the survey report.

- Time spent by a surveyor team leader finalizing the report if the surveyor team leader is not a supervisor - this time should be recorded as "Off-Site" report preparation time.

  NOTE: In addition to completing the "Supervisory Review" blocks, supervisors who <u>participate as surveyors in on-site activities</u> must enter their identification numbers so that they may input direct, survey-related time in the HCFA-670 boxes: "B" through "I".

M.   <u>**TOTAL CLERICAL/DATA ENTRY HOURS**</u>

Enter the number of clerical/data entry hours required to complete the clerical functions involved in finalizing the survey packet. These duties may include: typing, transcribing, filing, photocopying, file retrieval, logging/tracking provider/supplier packets and data entry. Data entry includes all direct entry of survey/complaint data into ODIE.

Clerical hours should <u>not</u> include time involved in making surveyor travel arrangements.

DO NOT RECORD:

- Time spent "logging in" to the HCFA Data Center or travel systems, nor time spent in troubleshooting. Correction of errors in the system discovered at a later time should not be counted.

- Certification-related administrative activities such as responding to telephone requests for technical assistance, for application forms or for CHOW forms.

- Time spent gathering, assembling, logging and tallying of CHOW forms, UNLESS a survey is done expressly in relation to a CHOW.

- General review of CHOW forms for content. This type of activity is never to be counted as a survey-related activity for any person, clerical or otherwise.

WAS STATEMENT OF DEFICIENCIES GIVEN TO THE PROVIDER ON-SITE AT COMPLETION OF THE SURVEY?

Check applicable box.

III.   HCFA-670 SHOULD NOT BE COMPLETED

A HCFA-670 should NOT be completed for the following:

- Routine in-office screening and review of incoming complaints (including: calls regarding the status/results of complaints, calls disputing findings of the investigation and/or calls from the complainant raising additional issues after the complaint survey has been completed);
- Time spent receiving, recording and logging HHA Hotline calls;
- Prospective Payment System (PPS) surveys, as they are not entered into ODIE;
- State licensure ONLY surveys (some States may require HCFA-670 completion for manual tracking purposes);
- Nurse Aide Training and Competency Evaluation Program (NATCEP) reviews; as they are not entered into ODIE.
- In-house review of CHOWs;
- Pre-occupancy reviews;
- Construction or planning reviews;
- Swing-bed surveys, as they are not entered into OSCAR;
- Time spent with regard to hearings/appeals;
- Quality assurance review; or
- Follow-up phone calls: questions asked by the public about specific providers,

questions asked by the providers themselves, calls by providers discussing facility operation problems, requests for guidance on physical plant changes or facility upgrades, calls regarding the status/results of complaints, calls regarding the statement of deficiencies, calls disputing findings of investigations or from complainants raising additional issues, etc.

NOTE: If we decide to use HCFA-670 data in the budget formulation process, we plan to encompass time expended on the activities listed in this section in our budget calculations. See "ACCOUNTING FOR TIME NOT CAPTURED ON THE HCFA-670" section of this guide.

IV. **DIVIDING TIME**

A. **SEPARATE HCFA-670s**

Within the OSCAR system are three subsystems: ODIE, COMPLAINT and FMS. Different surveys are entered into each of these subsystems. Federal Monitoring surveys are entered into the FMS sub-system, complaint surveys are entered into the COMPLAINT subsystem and all other survey types (initials, recertifications, related follow-ups, LSC, etc.) are entered into ODIE, the third subsystem of OSCAR.

Therefore, a separate HCFA-670 is required for each of the following survey types:

- Health
- Life Safety Code (LSC)
- Complaint (on-site surveys only)
- Federal Monitoring Survey (FMS)
- Follow-up surveys (on-site follow-ups as well as mail/phone follow-ups)

EXAMPLE: If a follow-up survey to a recertification is completed along with a complaint survey, two HCFA 670s are required, just as separate HCFA-670s are required if a Life Safety Code (LSC) survey is completed in conjunction with a health survey.

B. **MULTIPLE HCFA-670s**

If multiple HCFA-670s are completed for a single facility, the total hours must be appropriately divided among the HCFA-670s. If time cannot be specifically attributed to one survey type or another (e.g., complaint, recertification & LSC), split the time equally. For multiple complaints regarding a single facility, please see the "COMPLAINT SURVEYS" section of this guide.

On a combined certification/State licensure survey, enter the total time (Federal plus

State licensure) spent on every phase of the survey.

In addition, travel hours should be divided equally between different survey types. For example, if a follow-up survey is done in conjunction with a complaint survey, the total travel time should be split 50/50 between the two survey types on the two HCFA-670s.

V.   **FOLLOW-UP SURVEYS/PHONE CALLS**

   A.   **MAIL/PHONE FOLLOW-UP SURVEYS**

   A HCFA-670 must be completed for ALL mail and/or phone follow-up surveys, including those done for CLIA follow-ups, CLIA monitoring and other health or LSC follow-ups.

   NOTE: Mandatory sections for mail/phone follow-up surveys differ from other survey types. Only the "Pre-Survey Preparation" (writing the letter to the facility and/or making the phone call) and "Off-Site Report Preparation" fields are mandatory for mail and/or phone follow-up surveys. The "On-Site", "Travel Hours", "First Date Arrived" and "Last Date Departed" fields may remain blank. The supervisory and clerical fields may be completed, if time was spent by these persons.

   B.   **FOLLOW-UP PHONE CALLS**

   A HCFA-670 should NOT be filled out for time taken to answer calls or clarify questions AFTER the survey has been completed (e.g., follow-up calls/questions regarding the Statement of Deficiencies). In addition, time spent on State quality assurance review of deficiencies and time spent preparing for a trial or rewriting deficiencies after RO review is NOT recorded on the HCFA-670. See "Accounting for Time Not Captured on the
   HCFA-670" section of this guide for further explanation.

   C.   **OTHER FOLLOW-UP SURVEYS**

   If the State agency receives a request for a Fire Safety Evaluation System (FSES) review after the survey package has been completed, the time expended on the FSES review should be reported on a separate HCFA-670, as a mail/phone follow-up survey. Simply complete the two mandatory sections of the mail/phone follow-up survey ("Pre-survey Preparation" and "Off-Site Report Preparation"), leaving the "On-Site", "Travel Hours", "First Date Arrived" and "Last Date Departed" fields blank.

D.   **FURTHER CLARIFICATION OF FOLLOW-UP SURVEYS:**

For purposes of a HCFA-670 preparation, a survey is considered complete when the Statement of Deficiencies (HCFA-2567) is sent to the facility. (Procedures call for this to be done within 10 days of completion of the on-site survey.) Activities taking place AFTER the Statement of Deficiencies is sent out SHOULD NOT be included on the HCFA-670 that covers the on-site survey.

Follow-up survey activities should be recorded on a new HCFA0670. Follow-up or revisit activities include:

- An on-site visit to a facility to verify the correction of deficiencies.
- Write-up time to prepare a new HCFA-2567 for cases in which uncorrected or new deficiencies are cited.
- Time spent in telephoning or writing to a facility to request submittal of documents that will verify correction of deficiencies.
- Review of requested follow-up documentation submitted by a facility to substantiate the correction of deficiencies, including time spent communicating with the facility to clarify the submitted documentation.

Time spent on the following activities should not be record on the HCFA-670:

- For follow-up visits in which new deficiencies are cited and a new HCFA-2567 is issued, time spent on the receipt and review of the plan of correction (POC) and acceptance or rejection of the POC, including time spent working with, or "coaching', a facility to get an acceptable POC. (As with a regular survey visit, a follow-up visit at which new deficiencies are cited ends for HCFA-670 purposes when a HCFA-2567 is sent to the facility).
- Time spent during general communications with a facility responding to inquiries concerning the survey, the follow-up, deficiencies and corrective actions.

REVISION TO POLICY REGARDING VERY BRIEF FOLLOW-UPS

A 02/25/94 memorandum addressed to CLIA personnel contained the following rule: Only report follow-up activities that take 15 minutes or longer on the HCFA-670. This rule was implemented in light of the fact that the OSCAR system was programmed to allow the input of time only in quarter hour (15 minute) increments. This was done in order to capture time periods small enough to allow accurate reports, yet large enough to be easily divisible for recording purposes.

However, it is now recognized that it is important to record every follow-up,

including the few that might consist of activities that are very brief. Consequently, the above rule is rescinded and the new rule is as follows:

> **"Complete a HCFA-670 for every follow-up. If any follow-up activity takes less than one quarter hour, round up to one quarter hour for that activity."**

<u>CLIA FOLLOW-UP AND ADDITION OF SPECIALTY/SUBSPECIALTY-ONLY SURVEY CLARIFICATIONS:</u>

<u>CLIA BILLING OF FOLLOW-UPS:</u>

All on-site follow-up (revisit_ activity will be billed to the laboratory. Off-site follow-up time related to an on-site follow-up will also be billed to the laboratory (e.g., travel, presurvey preparation, and off-site report preparation).

Off-site follow-up activity will not be billed to the laboratory if no on-site follow-up took place. However, the time expended on these survey activities should be recorded on the HCFA-670.

<u>CLIA ADDITION OF SPECIALTY/SUBSPECIALTY-ONLY SURVEYS</u>:

A survey completed only for the addition of a specialty(ies) should be entered on the HCFA-670 as a revisit or follow-up survey for purposes of capturing this information in the system. Reporting of time for these surveys should be consistent with the instructions for revisit/follow-up surveys for both on-site an doff-site (mail/phone) specialty/subspecialty addition-only surveys.

CLIA specialty/subspecialty addition-only surveys follow the CLIA billing guidelines for follow-up (revisit surveys, as stated above.

VI.   **<u>COMPLAINT SURVEYS</u>**

Multiple complaints against a facility investigated at one time should all be reported on <u>one</u> HCFA-670. OSCAR does not accept more than one complaint per survey date per facility. **These complaints should <u>not</u> be entered on separate HCFA-670s, entered under consecutive days, as stated in interim guidance packages distributed within some regions.**

If a complaint allegation is investigated while a surveyor is on-site conducting a follow-up survey, two HCFA-670s should be completed; one for the follow-up and one for the complaint. <u>Time that cannot be specifically attributed to one survey or the other should be divided equally between the two surveys.</u>

In-office complaint review should be recorded on the HCFA-670 as pre-survey preparation time ONLY by a surveyor preparing for a visit to a facility. Routine in-office screening and review of incoming complaints should not be recorded on the HCFA-670. If a complaint does not warrant a survey,(e.g., the complaint is handled over the telephone), completion of the HCFA-670 is not required.

NOTE: A HCFA-670 is <u>NOT completed/revised</u> to record time expended in calls regarding the status/results of complaints, calls disputing findings of the investigation and/or calls from the complainant raising additional issues after the complaint survey has been completed.

HHA Hotline Calls/Complaints: Time spent receiving, recording and logging HHA Hotline calls <u>IS NOT</u> recorded on the HCFA-670. Complete a HCFA-670 only to record survey preparation activities by the surveyor who conducts an on-site survey resulting from a home health agency hotline call/complaint.

VII.   **<u>LICENSURE SURVEYS</u>**

On a combined Federal certification/State licensure survey, one HCFA-670 is required. Enter the total (Federal plus licensure) time expended on the various phases of the survey (e.g., preparation, on-site, etc.).

VIII.**<u>MANDATORY SECTIONS</u>**

Two circumstances exist under which completion of the HCFA-670 is required. These circumstances include: completion of the form for **ON-SITE SURVEYS** and completion of the form for **MAIL/PHONE FOLLOW-UP SURVEYS.** The mandatory sections of the form differ for each circumstance.

A.   **<u>ON-SITE SURVEYS - MANDATORY SECTIONS</u>**

The following fields are mandatory for <u>each team member</u>:

- Surveyor ID Number
- First Date Arrived
- Last Date Departed
- On-Site Hours (in at least one of the categories)

The following fields are mandatory for <u>at least one team member</u>:

- Pre-Survey Preparation (minimum of .25 hrs.)
- Off-Site Report Preparation (minimum of .25 hrs.)

B. **MAIL/PHONE FOLLOW-UP SURVEYS - MANDATORY SECTIONS**

The following fields are mandatory for <u>at least one team member:</u>

- Pre-Survey Preparation; this would include writing the letter to the facility and/or making the phone call.
- Off-Site Report Preparation

Allow the "On-Site", "Travel Hours", "First Date Arrived" and "Last Date Departed" fields to remain blank. The supervisory and clerical fields may be completed, if time was spent by these persons.

IX. **OSCAR SYSTEM CORRECTIONS AND REPORT SUMMARY**

A. **OSCAR SYSTEM CORRECTIONS**

If, after data entry is completed, errors are detected on the HCFA-670 or any of the survey documentation or in regard to data entry, changes should be made (hours added, subtracted or changed) by using the "Update" function.

If any OSCAR system problems regarding the HCFA-670 are found, please report these to the OSCAR Action Desk at 1-800-624-4113.

B. **SUMMARY OF OSCAR REPORT 25**

OSCAR standard Report 25 gives a count of the number of initial and recertification surveys and follow-up surveys performed during a particular quarter or year and entered into the selected subsystem. The detail report includes a breakout of surveys included in the summary report.

OSCAR standard Report 25 requires the selection of the complaint subsystem for a count of the number of complaint surveys and selection of the FMS subsystem for a count of the number of FMS surveys performed during a particular quarter or year.

X. **ACCOUNTING FOR TIME NOT CAPTURED ON THE HCFA-670**

The HCFA-670 was designed to capture DIRECT survey and travel time and the related time necessary to prepare for the survey and complete the report of the survey. HCFA recognizes the existence of various indirect support activities that must be accounted for in determining the most effective budget allocations among the States.

The data arising from HCFA-670 completion must be uniform and accurate for it to be useful and fair for everyone. Only when our data is reliable can it be used for honest analysis, comparison, evaluation and projection.

We recognize the following as indirect time that is not captured by the HCFA-670 (and not intended to be):

1.   General administrative time (e.g., time spent logging on to the computer, time spent trouble-shooting)

2.   Certification-related administrative activities (e.g., telephone requests for technical assistance, applications and CHOW materials)

3.   Orientations, developing programs, training, etc.

4.   Quality assurance activities

5.   Log maintenance (e.g., HHA Hotline, complaints, adverse actions, initial applicants, etc.)

6.   Facility consultation

7.   Mail/telephone provider/supplier/public inquiries

8.   Scheduling

9.   Staff meetings/coordination activities

We recognize the following as indirect time that is not captured by the HCFA-670 (and not intended to be):

10.   Management meetings/coordination activities/time spent on surveys by non-surveyor, supervisory personnel

11.   Processing packets for change in beds, change in services, change in ownerships, etc.

12. Clerical time: filing, updating manuals, handling mail, telephone, receptionist, copying, travel arrangements, requisitioning supplies/ordering forms, quarterly reports, processing timesheets, typing reports

13. Licensing activities when separate from the Federal certification survey

14. Time spent on facility adverse actions and terminations from the program, hearing and appeal activities, lawyer consultations, regional office, facility and press consultations

15. Time spent on surveys which are not entered into OSCAR: PTIPS, PPS, etc.

16. Budgeting activities

XI. **CONCLUSION**

This guide is issued as an ongoing educational effort designed to enhance the accuracy of HCFA-670 reporting practices. If you have any additional questions regarding this guidance or any aspect of the HCFA-670, please call LaDonna Calleia at (214) 767-4417 or your State Representative.