

MEMORANDUM

Department of Aging and Disability Services Regulatory Services Policy * Survey and Certification Clarification

TO: Regulatory Services
Regional Directors and State Office Managers

FROM: Veronda L. Durden
Assistant Commissioner
Regulatory Services

SUBJECT: **Life Safety Code (LSC) Surveys at In-patient Hospice Facilities-S&CC #05-12**

APPLIES TO: Home and Community Support Services Agencies (HCSSA) Program State and Regional Survey Staff

DATE: October 6, 2005

An in-patient hospice facility survey must be coordinated between the surveyor and the State Office Life Safety Code (LSC) unit. Surveyors have asked how they should coordinate this survey. The following responses address issues HCSSA surveyors and regional clerical staff have raised regarding the LSC portion of surveys at in-patient hospice facilities.

Who conducts the LSC survey of in-patient hospice facilities licensed and certified by the Regulatory Services HCSSA hospice section?

State Office LSC staff conduct LSC portions of state initial licensure surveys, initial certification surveys and recertification surveys at all in-patient hospice facilities, including alternate delivery sites, as applicable.

How is the LSC portion of the survey(s) scheduled?

Regulatory Services HCSSA regional staff monitor initial licensure, initial certification and recertification due dates and contact State Office LSC staff when a regional HCSSA hospice survey is about to be scheduled. State Office LSC staff need to be notified at least two weeks prior to the health survey date. Fred Worley, at 512-438-2311, is the current State Office LSC contact person. State Office LSC staff schedule initial licensure or certification surveys with the applicant. Recertification surveys should be coordinated with HCSSA regional staff to ensure State Office LSC staff enters the facility only after the beginning of the health survey.

Who data enters LSC survey findings?

State Office LSC staff enter findings in the Automated Survey Processing Environment (ASPEN) Central Office (Form CMS-2567; Form CMS-2786; Form CMS-670; and DADS Form 3724). State Office LSC staff e-mail Regulatory Services HCSSA regional staff when data entry is complete. Delinquent entry queries should be sent to State Office LSC survey staff for corrections or amendments.

Are LSC survey staff involved with hospice in-patient facility enforcement issues?

Regulatory Services HCSSA regional staff print and mail Form CMS-2567 (along with other notification letters) to the facility. Regulatory Services HCSSA regional staff review and accept the plan of corrections (PoC); however, State Office LSC staff must be consulted prior to accepting the PoC when deficiencies or violations have been documented. Revisit scheduling is also done collaboratively between Regulatory Services HCSSA regional staff and State Office LSC staff when deficiencies or violations have been documented.

How are LSC in-patient facility survey records maintained?

State Office LSC staff send a hard copy of survey forms and notes to the Regulatory Services HCSSA regional staff responsible for in-patient hospice facilities. Regional staff incorporate these forms with health survey forms for a complete certification and licensure packet, maintaining the file in the Regulatory Services HCSSA region.

For questions concerning this memorandum, please contact Mary Valente, Program Manager, Policy Development and Support, at (512) 438-2440.

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