



**Center for Clinical Standards and Quality/Survey & Certification Group**

**Ref: S&C 17-09-ALL**

**DATE:** November 18, 2016  
**TO:** State Survey Agency Directors  
**FROM:** Director  
Survey and Certification Group  
**SUBJECT:** Infection Control Pilot: 2017 Update

**Memorandum Summary**

- **Project Overview:** The Centers for Medicare & Medicaid Services (CMS) is in the second year of a three year pilot project to improve assessment of infection control and prevention regulations in Long Term Care (LTC) facilities, hospitals, and during transitions of care. All surveys during the pilot will be educational surveys (no citations will be issued) and will be conducted by a national contractor.
- **Second Year Activities:** Using draft surveyor Infection Control Worksheets (ICWS) based on the new Long Term Care regulation as well as a revised hospital surveyor ICWS, 40 hospital surveys will be paired with surveys of LTC facilities, in order to provide an opportunity to assess infection prevention during transitions of care. In addition, CMS will pilot technical assistance opportunities for facilities in efforts to improve their infection control programs to meet these new regulations. The draft ICWSs are attached to provide transparency of CMS pilot expectations.

**Background**

CMS is in the second year of a pilot project to meet survey priorities related to assessing the continuum of infection prevention efforts for, and between, hospitals and nursing homes. The proposed outcomes of the pilot include new surveyor infection control tools, and survey processes that can be used to optimize future assessment of new and proposed infection control regulations. The new LTC regulation has been finalized with phased implementation over the next three years.

In the first year of this pilot, a draft LTC surveyor ICWS was developed, in collaboration with the Centers for Disease Control and Prevention (CDC), and tested in 10 pilot surveys. In anticipation of the second year of this pilot, we also developed a draft revision of the current hospital surveyor ICWS.

**Scope of Work**

During Fiscal Year 2017, the following will occur:

- In October, 2016 a Technical Expert Panel (TEP), composed of multiple stakeholders, CMS and CDC, met to provide input to CMS on how best to assess infection prevention during the transitions of care. Based on TEP input, the ICWSs will include questions on this topic and then be finalized for use in pilot surveys.
- 40 hospitals and a single LTC facility associated with each hospital (based on admissions between each facility) will be surveyed using the ICWSs and assessed for infection prevention during transitions of care.
- Based on survey findings, action plans for improvement will be developed in conjunction with the national contractor, and technical assistance may be identified and offered to help with improvement.
- The ICWSs will be revised based on surveyor feedback after surveys have been completed.

There is no firm commitment to use an ICWS during hospital or LTC surveys in the future. We will use a revised version of the hospital ICWS and anticipate that there may be further changes based on feedback from the pilot surveys. The language on the LTC surveyor ICWS is subject to change based on surveyor or stakeholder feedback. Regardless of future changes to these draft ICWSs, they represent transparency for facilities.

CMS will use a national contractor to perform these educational pilot surveys. While no citations will be issued, if an Immediate Jeopardy deficiency is noted, a referral to the CMS Regional Office (RO) will be made. CMS Central Office staff will communicate details and updates regularly with ROs and State Survey Agencies throughout this pilot. The selection of the facilities to participate in this pilot will be communicated at a later time to the ROs. Additionally, CMS is releasing the draft ICWSs to provide transparency of CMS pilot expectations.

**Contact:** Please send all questions to Dr. Daniel Schwartz at [daniel.schwartz2@cms.hhs.gov](mailto:daniel.schwartz2@cms.hhs.gov).

**Effective Date:** Immediately. This policy 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 (s)

Attachment 1- Draft pilot surveyor LTC IWCS

Attachment 2- Draft pilot surveyor hospital IWCS

cc: Survey and Certification Regional Office Management

*The contents of this letter support activities or actions to improve patient or resident safety and increase quality and reliability of care for better outcomes.*