

Center for Medicaid and State Operations/Survey and Certification Group

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Ref: S&C-07-09

**DATE:** December 21, 2006

**TO:** State Survey Agency Directors

**FROM:** Director  
Survey and Certification Group

**SUBJECT:** Solicitation of State Survey Agency Participation in Quality Indicator Survey (QIS) Implementation

**ACTION REQUIRED BY MARCH 1, 2007**

**Memorandum Summary**

We invite State survey agencies (SAs) that are not currently participating in the QIS demonstration to apply for selection for future statewide implementation of the Quality Indicator Survey (QIS).

This memo:

- Provides information to States regarding Centers for Medicare & Medicaid Services (CMS) support for QIS implementation so that States can make informed decisions about participation;
- Provides information so that States have an understanding of the resources required, time involved, and the equipment purchases necessary to implement the QIS statewide; and
- Requests detailed information from SAs so that the selection by CMS of States to implement QIS can be accomplished in the most successful manner.

All SA responses received by March 1, 2007 will be considered.

A conference call has been scheduled for Wednesday, January 24, 2007 at 1:00 PM ET to discuss this request with all SAs and CMS regional offices. The toll free number for the call is 1-888-316-9406; the pass code is "QIS;" the call leader's name is Katherine Lochary; and, each State is permitted two lines for the call.

**BACKGROUND**

The CMS recognized the need to improve the consistency and effectiveness of the nursing home standard survey process and awarded a contract in 1998 to develop improvements to that process. The contract was awarded to the Research Triangle Institute with the University of Colorado's Division of Health Care Policy and Research and the University of Wisconsin's Center for Health Systems Research and Analysis serving as primary subcontractors.

The multi-year developmental effort is now nearing completion. Improvements to the survey process are incorporated into a fundamentally revised survey called the Quality Indicator Survey (QIS).

The objectives of the QIS process include:

- Improve consistency and accuracy of quality of care and quality of life problem identification using a structured process;
- Comprehensively review a wide range of regulatory Care Areas within current survey resources;
- Enhance documentation by organizing survey findings through automation;
- Focus survey resources on facilities with the largest number of quality concerns; and
- Achieve all improvements to the survey process within the existing survey and certification budgeted resources.

The QIS was designed as a two-stage process for use by surveyors to (1) systematically and objectively review a wide range of regulatory areas and (2) subsequently focus on selected areas for further review. In brief:

- Stage I consists of both the collection of off site data (such as the Minimum Data Set (MDS)) as well as data collected on site. The information gathered is used to derive a set of Quality of Care Indicators (QCIs) that can be compared to national norms. These QCIs combine information gathered from observations, clinical record reviews, and resident, family, and staff interviews to identify a set of Care Areas, as well as residents in each of the Care Areas for investigation in Stage II.
- Stage II is a systematic investigation of areas flagged in Stage I. It is organized around Critical Element Pathways with investigative probes for the Care Areas that have been triggered.

The QIS relies on a substantially expanded resident sample that permits the ability to compare facility practice with national norms, and triggers potential areas of concern in a more objective manner than the current survey process. It also results in more time and intensity of review in those States which have more serious quality concerns compared to other nursing homes.

We wish to express our gratitude to the five States that participated with CMS in the development, testing, and evaluation of Phase I of the QIS demonstration process. These five States are: California, Connecticut, Kansas, Louisiana, and Ohio. Between October of 2005 and October of 2006, surveys of record were conducted in over 170 nursing homes by the five States. The States of Florida and Connecticut are assisting CMS in Phase II of the QIS demonstration process including development and refinement of a training model to support statewide implementation of the QIS process. The commitment and hard work of these States make it possible to now proceed to the initial phase of QIS implementation.

In August of 2006, the ADMIN INFO 06-19 included a budget note informing States that CMS plans to move forward with limited implementation of the QIS in FY2007 and FY2008 contingent upon acceptable findings from the evaluation of the demonstration. Previously, implementation of the QIS was discussed with SA Directors during the CMS Leadership Summit in April of 2006 and at the AHFSA annual conference in October of 2006.

Although we have not received final results from the evaluation of the QIS, the preliminary information received is very positive and indicates that it is time to strategically move forward with plans to implement the QIS process in an estimated eight to ten additional selected States.

The purpose of this communication is to formalize the State solicitation process by:

- Providing information to States regarding CMS support for QIS implementation so that States can make informed decisions about participation;
- Providing information so that States have an understanding of the resources required, time involved, and the equipment purchases necessary to implement the QIS statewide; and
- Requesting detailed information from SAs so that the selection by CMS of States to implement QIS can be accomplished in the most successful manner.

The QIS demonstration States have already received the requisite QIS training and will receive train-the-trainer instruction from the CMS contractor; therefore, the demonstration States are not included in this solicitation. CMS will select additional States to implement QIS based on an evaluation of the State's response to this solicitation and discussion of the State's application with the State's CMS regional office. CMS will consider all SA responses to this solicitation received by March 1, 2007. The capacity of a State to implement QIS fully in the State will depend on several factors including the resources to purchase equipment, the number of nursing home surveyors in the State, and the number of staff that a State can devote to learning the QIS process while meeting their survey workload within statutory requirements. At this time, CMS estimates that the expansion of the QIS process in selected States leading to full implementation in these States would commence in the fall of 2007.

Specific information and instructions for responding to this request are found in the attachments. Questions about this communication may be submitted to [QIS\\_Implementation@cms.hhs.gov](mailto:QIS_Implementation@cms.hhs.gov) or you may contact Kathy Lochary in the Division of Nursing Homes at (410) 786-6770. A conference call to discuss this solicitation with all States interested in participating and all CMS regional offices has been scheduled for Wednesday, January 24, 2007 at 1:00PM ET. The toll free number for the call is 1-888-316-9406; the pass code is "QIS;" the call leader's name is Katherine Lochary; and, each State is permitted two lines for the call.

/s/

Thomas E. Hamilton

Attachments:

- Attachment 1: CMS Commitment to Support QIS Implementation
- Attachment 2: Criteria for State Participation in QIS Implementation
- Attachment 3: Notice of Intent to Apply
- Attachment 4: Instructions for Completing the Application
- Attachment 5: Application Form

cc: Survey and Certification Regional Office Management (G-5)

## **CMS Commitment to Support QIS Implementation**

CMS will provide the following assistance to support States selected to participate in the expansion of the QIS process:

**Train Core Teams** - The starting point for training in each selected State will be the training of two core survey teams of four surveyors each. CMS, through its contractor, will provide training in the State to two core survey teams, a systems/technical person, and one or more supervisors/managers at one time. At this time, CMS expects that the training will follow an approach similar to the training that is taking place in the demonstration States.

1. **Classroom training** - Training within each State will begin with four-day classroom training, facilitated by a CMS contractor. The classroom training approach taught will incorporate a blended approach of Web-based presentations, lectures, exercises, computer tutorials, and discussions that will be developed by CMS contractors.
2. **Mock training survey** - Immediately following the QIS basic classroom training, each team will participate in a mock training survey (which is not a survey of record) using the QIS process and the QIS Data Collection Tool (DCT) software. During the mock training survey, two members of the contractor staff (one clinical expert and one technical expert) will be present in a training capacity to work with the teams and ensure that they understand and are using the QIS process correctly. An additional mock training survey will be conducted if it is determined that a team is not in compliance with the QIS process and requires additional training.
3. **Survey of record and compliance assessment** - Immediately following the successful completion of the mock training survey, the first survey of record will take place. During the first surveys of record, one contractor staff member will be present in a training capacity and another will be present to assess compliance with the QIS process using established compliance evaluation protocols. The contractor will conduct a minimum of two compliance assessments for each team. The first compliance assessment will be conducted during each team's first survey of record, and a second will be conducted following each team's completion of three surveys of record. If a team fails either compliance assessment, a third assessment will be conducted.

**Fund Cost and Certify QIS State Trainers** – Trainers will be selected from the two core teams. CMS will pay for the training of four trainers in a State. If the State decides that additional QIS trainers will be CMS-certified at this time, the State will be expected to bear all additional costs associated with the contractor's workload of training the additional trainers. The manner in which the training of trainers is structured makes it most efficient to train the trainers in groups of two. An estimated cost per each additional pair of trainers is approximately \$33,500 for the entire course, including all contractor costs of travel and training materials and the "train the trainer" modules. CMS contractor will provide specialized training (referred to as the QIS Training Certification) to prepare State trainees to facilitate the QIS training of the remaining surveyors in their respective State. The QIS Training Program, leading to CMS certification as a QIS State trainer, will consist of four steps:

1. A three-day train-the-trainer program (TTP), which will take place once the core teams have completed at least six QIS surveys of record and have developed sufficient comfort and expertise with the QIS process. In a classroom setting led by contractor staff, the TTP will provide specialized background information and knowledge of the QIS, including in-depth training on the QIS DCT and computer hardware, classroom and onsite facilitation techniques, optimal use of the QIS process; protocols for assessing on-site compliance with the QIS process, and preparation for addressing questions frequently asked by surveyors. The classroom training approach taught under the TTP program will incorporate a blended approach of Web-based presentations, lectures, exercises, computer tutorials, and discussions that will be developed by CMS contractors.
2. The QIS State trainers will facilitate a QIS basic classroom training session for surveyors within their State using a blended training approach and this training session will be observed by contractor staff.
3. The QIS State trainers will lead a mock survey within their State with a team of four surveyors. The QIS State trainers will be observed by contractor staff during the mock survey.
4. The QIS State trainers will assess compliance of the team of four surveyors during a survey of record in their State using an assessment instrument developed by CMS. The QIS State trainers will be observed by contractor staff conducting the assessment.

Upon successful completion of all four of these steps, participants in this training will become CMS-certified QIS State trainers and will then be qualified to conduct all training activities in their respective States.

The State will be provided written guidance, including a compliance process, to be used as each State takes over responsibility for surveyor training. The purpose of the compliance process is to assist in assuring consistency in implementation and aid the State in assuring surveyor competence in conducting the QIS.

**Provide Hardware for Two Survey Teams of Four Members Each** – CMS will provide 9 tablet PCs and 3 portable printers to each State selected to fully implement the QIS process in their State. This will equip the core group of surveyors (initial 8 surveyors) with a tablet PC, one printer per team, and provide one extra tablet PC and one printer as a backup. (Please refer to the Minimum Client Requirements: New Purchases discussed in the Admin Info 06-19, Fiscal Year (FY) 2007 State Survey & Certification Budget Letter.)

**Provide Information Technology (IT) Support** – CMS will provide ongoing IT support through a Helpline created by a CMS contractor.

**Support to Meet Survey Frequency Workload** - The purpose of the training is to develop survey proficiency using the QIS process and complete the additional required training activities to become a CMS-certified QIS State trainer. The necessary supervisory classroom and field work are resource intensive and must be accomplished while the State still meets the standard survey frequency requirements for nursing homes. As such, it may be difficult for a State to meet the QIS training requirements and the statutory and regulatory requirements related to the frequency of standard surveys of nursing home.

If Congress passes the Survey and Certification budget as proposed by the President, CMS will explore with the State the use of CMS contract surveyors to assist in meeting the nursing home survey frequency workload. (The Federal requirements specify that every nursing home must receive a standard survey no later than 15 months after the previous standard survey and the statewide average interval of standard surveys must be 12 months or less.) However, Congress is currently considering a continuing resolution for all of 2007 that would extend funding levels for most federal programs.

Therefore, States should make the decision to apply based on the assumptions that (a) no special federal help will be available to meet statutorily-required survey frequencies, but that (b) statewide phase-in of the QIS may be spread over 3 fiscal years.

**Learning from Demonstration States**

CMS will facilitate a process that provides opportunities for the States selected to participate in implementation of QIS process to discuss issues and concerns with the demonstration States.

## **Criteria for State Participation in QIS Implementation**

This section explains: The qualifications and expectations of the surveyors selected to survey and then to train additional surveyors; the type of management/supervisory expertise and oversight required; the technical staff abilities to assure competency; the equipment purchases necessary; and, the types of information that CMS expects to be included in a State's implementation plan that will assist CMS in the selection of States.

### **Eight Core Surveyors (Two teams of four each)**

The initial group of eight surveyors selected must:

- Have a minimum of two years of recent long term care (LTC) survey experience;
- Have received a passing score on the SMQT;
- Possess strong leadership ability and demonstrate an interest in and commitment to learning the QIS process;
- Understand that the State's QIS trainers will be selected from the eight core surveyors and understand that training involves leading classroom sessions and providing feedback and oversight to other surveyors;  
(Note: In selecting the individuals to comprise this initial group of eight surveyors, we hope States will consider those surveyors who may have prior experience as a trainer or teacher, preferably with respect to the LTC survey process. After the initial QIS training period, some of the core team member surveyors will be selected to participate in a Train-the-Trainer program. The goal of the Train-the-Trainer program will be to equip the selected surveyors with the necessary skills and knowledge to become lead QIS trainers in their State. The Train-the-Trainer instruction will target the optimal use of the QIS process, using the QIS software and hardware, and effective classroom and onsite facilitation techniques for adult learners.)
- Possess intermediate computer skills (e.g., file management and use of a flash drive) and be comfortable learning how to use new technology. (The QIS process involves the extensive use of tablet PCs to collect interview and observation data using handwriting recognition technology and to execute other survey tasks. Currently, tablet PCs are not commonly used by most surveyors; achieving proficiency using tablet PCs during the survey process will likely require time, patience, and practice.);
- Agree to participate in periodic calls with CMS and/or its contractor(s);
- Remain with the project during the implementation; and
- Be 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.

### **State QIS Trainers**

- As described above, the State's QIS trainers will be selected from the State's core team members and the SA will determine the number of core team members to receive additional training to become State QIS trainers;
- State QIS trainers are expected to participate in a Train-the-Trainer program to equip them with the necessary skills and knowledge to become lead QIS trainers in their State;
- Trainers will be expected to lead and facilitate classroom sessions, complete an evaluation of each surveyor, provide feedback and oversight to other surveyors during field work; and

- State trainers are expected to successfully complete CMS certified QIS State trainer requirements. (Note: The Train-the-Trainer instruction will target the optimal use of the QIS process, using the QIS software and hardware, and effective classroom and onsite facilitation techniques for adult learners.)

### **Management/Supervisory Oversight Expectations**

A strong and supportive first-line manager/supervisor is a key element of success. The QIS manager/supervisor must:

- Be in a position to make management decisions for the eight selected surveyors comprising the two core teams (four surveyors per team);
- Demonstrate a strong commitment to supporting 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, including the mock survey, compliance assessment during two surveys of record, and accompanying the QIS teams on a periodic basis;
- Achieve mastery of the QIS in order to review survey data at the State, provide oversight of survey teams, and manage potential challenges from nursing homes;
- Serve as a point of contact for the SA and generally consolidate information regarding the QIS implementation activities to discuss with CMS and/or its contractor(s) through periodic calls and other communications;
- Coordinate with the CMS and/or its contractor(s) on the resolution of questions/issues regarding the QIS; and
- Develop and participate in general presentations for stakeholders (provider and consumer organizations) explaining the QIS process and the manner in which the implementation will be conducted.

### **ASPEN Technical Staff Expectations**

The designated ASPEN technical staff member must:

- Possess the required skill to function as the first line of contact for surveyors to address and resolve any software issues using the QIS process, specifically the QIS Data Collection Tool (DCT);
- Successfully complete ASPEN Technical Training;
- Have experience and proficiency with the ASPEN suite of products, specifically ASE and ACO including:
  - Creating survey shells in ACO;
  - Assisting staff with uploading surveys from ASE to ACO;
- Participate directly in both classroom and onsite QIS training; and
- Be capable of training additional specialists in the technical aspects of the QIS process.

### **Equipment Expectations**

The SA agrees to equip, in a timely manner, all remaining surveyors with tablet PCs and portable printers consistent with equipment specifications contained in the Admin Info 06-19, Fiscal Year (FY) 2007 State Survey & Certification Budget Letter. At the time training begins for the State's QIS trainers, the State will need to have purchased the tablet PCs and portable printers for use by the first class of new surveyors receiving QIS training. The SA is responsible for providing supplies for the printer and maintenance for the equipment. The SA agrees to outline the specific plans for acquiring the equipment including the anticipated dates of budget submissions.

### **Detailed Plan and Timeline Expectations**

Implementation of the QIS process will occur over a period of time and include contractor support as outlined in Attachment 1 during the initial phases of implementation. States are requested to submit a descriptive plan documenting the major steps and the expected duration of each step of QIS implementation beginning with the contractor training of the two core teams and ending with the projected date of completion of the training of all nursing home surveyors in the State by the State's CMS-certified QIS State trainers. Regarding the initial training involving the CMS contractor, the State is responsible for all logistical arrangements related to training conducted by the contractor, such as securing a meeting location and providing materials for participants. After all of the State's surveyors are trained in the QIS process, all subsequent surveys of nursing homes will be conducted using the QIS process.

Determining the rate at which the training of all nursing home surveyors in the State can take place will depend on several factors including: the number of certified trainers (i.e., trainers who have successfully completed the QIS Training Certification Program in the State); the total number of nursing home surveyors to be trained in the State; and, the availability of hardware to equip the surveyors. The requisite training related activities that will need to be completed by the State's QIS trainers include classroom training, mock survey, and technical assistance during surveys of record. A State considers all of the relevant factors and training activities in determining its implementation plan. The State's process would replicate that described in Attachment 1 regarding the discussion of the CMS contractor training of two core State surveyor teams including the Train-the-Trainer activities.

At a minimum, the State survey agency's plan should include a timeline describing the key activities and the projected timeframe for the specific activity leading to statewide QIS implementation. The timeline should include dates and participants and/or responsible persons for key activities, including the following activities:

- Soliciting surveyor nominees
- Selecting surveyors
- Purchasing equipment
- Selecting nursing homes
- Training two core teams
  - Classroom training
  - Mock survey
  - Six surveys of record
- Selecting trainers
- Training of trainers
  - Classroom training
  - Assisting surveyors in a mock survey
  - Assessing compliance of a survey team during a survey of record
- CMS-certified QIS State Trainers train first group of additional surveyors
  - Classroom training
  - Mock survey
  - Conduct a compliance assessment during two of the six surveys of record
- CMS-certified QIS State Trainers train second group of additional surveyors
  - Classroom training
  - Mock survey
  - Conduct a compliance assessment during two of the six surveys of record

- CMS-certified QIS State Trainers train third group of additional surveyors
  - Classroom training
  - Mock survey
  - Conduct a compliance assessment during two of the six surveys of record(Training cycle would continue until all surveyors completed the QIS training.)

CMS expects that each State will provide in its response a discussion of how it will manage the survey workload responsibilities during the transition process to assure that standard surveys of nursing homes are conducted in accordance with statutory and regulatory requirements. Each State is expected to provide a description of possible contingency efforts it will consider to manage unplanned events, such as staff shortages, remedial training, provider resistance, etc.

**State support and commitment to QIS implementation**

CMS expects that the appointed official of the State agency in which the survey agency is located, (such as, the State Department of Health or the Department of Social Services) will sign a written agreement of support and commitment to full implementation of the QIS process. CMS would consider a written endorsement from the Governor's Office and/or the State legislature as further evidence of the State's commitment to the QIS process. CMS would consider a written endorsement from the provider and advocate organizations, including the State's ombudsman program as further evidence of the State's commitment to the QIS process.

**Notice of Intent to Apply**

Please complete and return this notice by February 1, 2007 to the resource mailbox - [OIS\\_Implementation@cms.hhs.gov](mailto:OIS_Implementation@cms.hhs.gov)

<b>Name of State:</b>
<b>Name of State Survey Agency :</b>
<b>Contact Name and Title:</b>
<b>Street:</b>
<b>City:</b>
<b>State:</b>
<b>Zip:</b>
<b>Telephone Number:</b>
<b>Fax:</b>
<b>E-mail address:</b>

## Instructions for Completing the Application

### **Format of the application:**

Submit your application using the following formats:

- The electronic copy must be in Microsoft Word format - Times New Roman, 12 point font, double spaced, with one-inch margins on all sides.
- The hard copy must be on white paper that is 8 1/2 by 11 inches in Times New Roman, 12 point font, double spaced.
- Total hard copy application package should not exceed 20 pages.

### **How to Submit the Application:**

The application must be submitted in two forms:

- An electronic copy should be submitted to the CMS Resource Mailbox – [QIS\\_Implementation@cms.hhs.gov](mailto:QIS_Implementation@cms.hhs.gov)
- A hard paper copy of the application, including signed letters of support, as described in the attached memo \_\_\_\_\_ should be submitted to:

Katherine Lochary  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Mail Stop S2-12-25  
Baltimore, Maryland 21244-1850

All hard copy applications postmarked by **March 1, 2007** will be considered in the selection of States to implement the QIS process.

**Application Form****SECTION I - IDENTIFYING INFORMATION**

State:		
Name of State agency in which the survey agency is located:		
Name of State survey agency:		
Address of State survey agency		
Street:		
City:	State:	Zip:
State survey agency director contact information		
Name:		
Street:		
City:	State:	Zip:
Telephone:	FAX:	
E-mail:		
Point of contact for QIS implementation		
Address:		
Street:		
City:	State:	Zip:
Telephone:	FAX:	
E-mail:		

**SECTION II – PERSONNEL QUALIFICATIONS**

Describe the qualifications or include the resume for each member of the core team, supervisor(s), and technical staff selected by the State for initial participation in QIS implementation.

**SECTION III – EQUIPMENT PURCHASE**

Provide documentation outlining the State’s plan to purchase all necessary hardware to implement the QIS process in accordance with the proposed implementation plan and timeline schedule. If necessary, please include the anticipated dates of budget submissions. The documentation must include a commitment to provide all nursing home surveyors with an appropriate tablet PC by the end of the statewide phase-in period.

**SECTION IV – IMPLEMENTATION PLAN**

Describe the State’s plan to implement the QIS process statewide. Include descriptions of the:

- implementation plan,
- the number of nursing home surveyors in the State - in total,
- the phase-in period to achieve statewideness (1-3 years),
- how the survey workload will be managed during the transition process to statewide implementation,

- any contingency efforts to manage unplanned events,
- an understanding of the intensity, duration, and sequence of training activities to assure timely QIS implementation in relation to the number of State surveyors, and
- an internal ongoing review or evaluation system to obtain valid information about progress.

**SECTION V – PROJECT PLAN**

Provide a timeline documenting the critical activities from start of QIS implementation to full statewide implementation.

**SECTION VI – SIGNATURES**

The undersigned have reviewed, approved and commit to support the State survey agency in full implementation of the QIS (Quality Indicator Survey) process.

Appointed official of the agency in which the State survey agency is located:

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Name	Title	Date
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State survey agency director:

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Name	Title	Date
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