DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicaid Services 7500 Security Boulevard, Mail Stop C2-21-16 Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality/Survey & Certification Group

Ref: S&C: 15-50-NH

DATE: August 28, 2015

TO: State Survey Agency Directors

FROM: Director

Survey and Certification Group

SUBJECT: Revised Quality Indicator Survey (QIS) Training Process and Clarification of

Trainer Roles and Responsibilities

Memorandum Summary

Revisions to the QIS Training Process – The Centers for Medicare & Medicaid Services (CMS) has revised the training procedures for State Survey Agencies (SA) and Regional Offices (ROs) utilizing the QIS to:

- Eliminate the mock survey and replace it with a survey of record;
- Eliminate the T3.5 process formerly called "The Trainer Instructor Training";
- Update the compliance process and associated tool used for evaluating surveyors; and,
- Clarify the role of Certified Trainers.

This revised QIS training protocol does not replace the structured training program each SA and RO is required to have as outlined in Exhibit 42 of the State Operations Manual (SOM).

The CMS has updated all aspects of the QIS training protocols, including the software portion to more accurately reflect current SA and RO needs, for those SAs that have completed the process of implementing the QIS. These changes have been made in conjunction with survey specific modifications in an effort to assist SAs and ROs with survey efficiency. This revised QIS training protocol does not replace the structured training program each SA and RO is required to have as outlined in Exhibit 42 of the SOM.

Orientation of Newly Employed Surveyors in States that have Implemented the QIS

Orientation of a newly hired surveyor generally takes between six and nine months. Section 4009C of Chapter 4 and Exhibit 42 of the SOM, describes the prerequisites for the newly employed Healthcare Facility Surveyor and Federal minimum qualification standards for surveyors of Long-Term Care (LTC) facilities. Section 4003.2A of Chapter 4 of the SOM requires that all Healthcare Facility Surveyors successfully complete the Basic Long Term Care Healthcare Facility Surveyor Training Course (BLTCC) within the first year of employment.

The Surveyor Minimum Qualifications Test (SMQT) addresses the knowledge, skills and abilities needed to conduct surveys in LTC facilities, and implements Sections 1819(g)(2) and 1919 (g)(2) of the Social Security Act, which require surveyors to meet minimum qualifications. Newly hired surveyors do not need be SMQT qualified prior to participating in QIS training components.

Newly-hired surveyors in QIS States or Regions should:

- Receive training in basic computer skills (including data management, using folders, word processing, and import/export functions for Automated Survey Processing Environment (ASPEN) Software);
- Observe three or more QIS surveys exposing the surveyor to the QIS process in a manner that does not require performing data entry or other survey related tasks;
- Complete QIS survey tasks under the direct supervision of a preceptor; and,
- Complete the CMS approved QIS training as provided by a Certified QIS trainer and State Training Coordinator as discussed below.

The QIS training does not replace the requirements that a newly employed surveyor must be oriented to the nursing home survey process, successfully complete the BLTCC, and receive a passing score on the SMQT. However, Section 4009F of Chapter 4 of the SOM does not apply to States that have fully implemented the QIS, since the guidance is specific to those SA's that are in the process of implementing QIS.

For those States that are still engaged in the implementation of QIS, collaboration with the RO and Central Office (CO) is required in order for training goals to be reviewed and approved.

QIS Training Requirements

1. CMS Approved QIS training

All Healthcare Facility Surveyors in States where the QIS is used are required to complete the CMS approved, State/Region-conducted QIS training as part of the SA's/RO's new surveyor orientation program. The training must be conducted by a certified QIS Trainer using only CMS-approved QIS Surveyor Training course material. The QIS training materials can be found at:

 $\frac{http://www.ucdenver.edu/academics/colleges/medicalschool/departments/medicine/hcpr/qis/qistraining-info/Pages/default.aspx\ .$

2. OIS Training Survey of Record

After completing the CMS-approved, QIS training the new QIS Surveyor must participate in a training Survey of Record. This training survey will formally replace the 'mock survey'. The Survey of Record is intended to allow the Certified QIS Trainer to assist newly-trained QIS surveyors to apply skills and knowledge gained from the CMS-approved QIS training. No more than two newly-trained QIS Surveyors should accompany one certified QIS Trainer on the Survey of Record.

Additionally, two Registered QIS Surveyors must be a part of the Survey of Record team. As surveyors that are supplementing the workload there is no requirement that these Registered QIS Surveyors be Certified QIS Trainers.

The newly trained QIS Surveyor(s) must receive a reduced assignment during Stage 1 on the QIS training Survey of Record when compared to the assignments given to the registered QIS Surveyors on the team. The newly-trained QIS Surveyor should also be given a reduced assignment in Stage 2. The QIS trainer will determine the assignment based on individual needs and abilities of the surveyor(s) in training.

The table below is an example of how Stage 1 assignments could be shared between new surveyors and Registered QIS Surveyors.

Surveyor	Stage 1 assignment
Trainee A	4 CS/4 AS
Trainee B	4 CS/4 AS
Trainee C	4 CS/4 AS
Trainee D	4 CS/4 AS
Registered QIS Surveyor	12 CS/ 7 AS
Registered QIS Surveyor	12 CS/7 AS

CS=Census Sample **AS**=Admission Sample

3. Skills Assessment

The CMS has developed a Skills Assessment procedure to replace the previously used QIS compliance process. The Skills Assessment was developed in conjunction with CMS ROs and SAs as an updated tool to assist with the determination of the newly-trained QIS Surveyor's understanding of the QIS process fundamentals. The newly trained surveyor must meet all requirements on the Skills Assessment as determined by the Certified QIS Trainer in order to become a registered QIS Surveyor. New QIS Surveyors can participate in an unlimited number of surveys to demonstrate he/she has met these requirements. If the surveyor will be acting as the Team Coordinator (TC) on a consistent or frequent basis, that surveyor must demonstrate and meet all TC requirements of the Skills Assessment. Documentation of Skills Assessment competency must be completed by a QIS Certified Trainer. Information regarding the Skills Assessment can be found at:

 $\frac{http://www.ucdenver.edu/academics/colleges/medicalschool/departments/medicine/hcpr/qis/Pag}{es/QIS-Compliance.aspx}$

While it is not required, CMS strongly recommends new surveyors complete the above steps before attending the QIS BLTCC.

4. Certified QIS Trainers

Certified QIS Trainers provide QIS training to the SAs and ROs surveyors. Ideally, Certified QIS Trainers function as a training team of two people. The CMS expects that each State and Region will have as many Certified QIS Trainers as necessary to sustain the training needs of the SA and RO.

To be considered for a Certified QIS Trainer the surveyor must:

- Have successfully completed the SMQT;
- Meet the requirements to be a registered QIS Surveyor;
- Have participated in at least six QIS Surveys of Record;
- Routinely participate in at least one complete QIS survey per quarter;
- Demonstrate sufficient mastery of the QIS process to serve as a trainer and/or trainer instructor; and,
- Demonstrate and maintain an understanding of the regulations and interpretive guidance.

To become a Certified QIS Trainer, Registered QIS Surveyors must participate and successfully complete the CMS-approved training for trainers that will be offered on a quarterly basis by the University of Colorado as discussed in this memo. It is expected this training will be no more than four hours in duration.

Certified QIS Trainer will be expected to:

- Deliver components of the CMS-approved QIS training to surveyors;
- Assist newly trained QIS Surveyors on a training Survey of Record; and,
- Complete a skills assessment on the newly trained QIS Surveyors.

5. Live Webinar Trainings for QIS

CMS in conjunction with, the University of Colorado will offer live QIS webinar trainings on a quarterly basis. The trainings will be based on needs of the SAs and ROs. The following courses will routinely be offered and will include:

- QIS Trainer training (formerly known as T3 training);
- Desk Audit Report (DAR) refresher training;
- QIS Revisit training;
- QIS Comparative training; and,
- Federal Oversight Quality Indicator Survey (FOQIS) training.

Each SA and RO will receive notice of the scheduled trainings and how to register. Each course will have a limited number of participants allowed, as well as a minimum number of participants required to conduct the training. Course materials will be made available electronically and will be the responsibility of the participant to print.

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The email resource for training notification, communication & registration will be: QIStraining@UCDenver.edu

Contact: Please contact Bonnie Reed at <u>bonnie.reed@cms.hhs.gov</u> with any questions regarding orientation and QIS training for new surveyors or Sheila Hanns for any questions related to the Basic Long-term Care Course at <u>sheila.hanns@cms.hhs.gov</u>.

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/ Thomas E. Hamilton

cc: Survey and Certification Regional Office Management