DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-12-25
Baltimore, Maryland 21244-1850

CMS/
CENTERS for MEDICARE & MEDICAID SERVICES

Center for Medicaid and State Operations/Survey & Certification Group

Ref: S&C-08-14

DATE: **March 21, 2008**

TO: State Survey Agency Directors

FROM: Director
                 Survey and Certification Group

SUBJECT: Federal Minimum Qualification Standards for Long Term Care (LTC) Registered
                 Quality Indicator Survey (QIS) Surveyors and CMS-Certified QIS Trainers for
                 States Implementing the QIS Process

Memorandum Summary

- **Standards for Training QIS Surveyors:** Attached are Federal minimum standards for
  training surveyors and trainers in the QIS. These standards are intended to assure effective
  and consistent QIS implementation for the training of State and Federal surveyors and their
  trainers in the Federal QIS process.

- **Applicable to States Implementing QIS:** The QIS training standards apply to all State
  Survey Agencies (SAs) implementing the QIS and their respective CMS Regional Offices
  (ROs).

CMS developed and tested a revised nursing home survey process as one measure to improve the
quality of care that our Nation's nursing home residents receive. The revised nursing home
survey process, the "Quality Indicator Survey" (QIS) is a computer assisted survey process that
is intended to focus survey resources to better achieve a more comprehensive and consistent
survey process for nursing homes.

We appreciate the participation of the SA managers and QIS surveyors in Connecticut, Kansas,
Louisiana, Ohio, and California in the development, testing, and evaluation of the QIS during the
demonstration process. We also appreciate the ongoing efforts of the SA managers and QIS
surveyors in Florida and Connecticut for assisting CMS in the development and refinement of a
training model to support statewide implementation of the QIS process. The commitment and
hard work of these States have made it possible to proceed to the next phase of national QIS
implementation.

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As previously communicated to all SAs and ROs, CMS is implementing the QIS process statewide in selected States. In addition to conducting Train-the-Trainer activities in the remaining demonstration States, Minnesota, recently began QIS training. The future rate of QIS implementation in additional States depends on the availability of CMS resources.

The Federal standards outlined in the attachment to this memo apply to all SAs implementing the QIS and their CMS ROs. We are distributing this memo to all remaining States at this time for informational purposes.

Effective Date: Immediately. Please ensure that all appropriate staff are fully informed within 30 days of the date of this memorandum.

Training: The information must be shared with all survey and certification staff, surveyors, managers, and the State and CMS regional office training coordinators.

/s/
Thomas E. Hamilton

cc: Survey and Certification Regional Office Management

Attachment

Federal Minimum Qualification Standards for Long Term Care (LTC) Registered Quality Indicator Survey (QIS) Surveyors and CMS-Certified QIS Trainers for States Implementing the QIS Process[1]

The QIS is a new federally approved process for surveying nursing homes. It includes the use of computer technology that is not utilized in the traditional survey process. The standards outlined in the information that follows are intended to assure effective and consistent QIS implementation for the training of State and Federal surveyors and their trainers in the Federal QIS process. These standards apply to all State Survey Agencies (SAs) implementing the QIS and their respective CMS Regional Offices (ROs).

I.   Orientation of Newly Employed Surveyors in a State Implementing the QIS

Section 4009C of Chapter 4 of the State Operations Manual (SOM), including Exhibit 42, describes the prerequisites for the newly employed health facility surveyor and Federal minimum qualification standards for surveyors of LTC facilities. Each QIS State determines if a newly hired surveyor will be trained in the QIS process or the traditional survey process and this determination will be based on the manner in which a QIS State is implementing the QIS.

Implementation of the QIS process in a State does not replace or alter the requirements that a newly employed surveyor must be oriented to the nursing home survey process, successfully complete the Basic Long Term Care Health Facility Surveyor Training Course (BLTCC), and receive a passing score on the Surveyor Minimum Qualifications Test (SMQT).

In a QIS State, if a newly hired surveyor is being oriented to the QIS process, the preceptor assigned to this surveyor is both SMQT qualified and a Registered QIS Surveyor. The preceptor performs the same responsibilities as a preceptor of a newly hired surveyor in a State using the traditional survey process.

As part of the field experience in the State's orientation of a newly hired surveyor to the QIS process and prior to attending the formal QIS classroom training, the newly hired surveyor in a QIS State should:

1. Receive training in basic computer skills (including data management using Folders, Import/Export functions and Microsoft Word);

2. Observe one or more QIS surveys, including exposure to the QIS process;

3. Complete QIS survey tasks under the direct supervision of the preceptor to the extent that the preceptor is confident that the newly employed surveyor understands the process; and

4. Attend the formal QIS training at the point in time that the State determines the newly employed surveyor is prepared to begin QIS training.

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[1] State Survey Agencies approved by CMS to implement the QIS process for nursing home surveys will be referred to as "QIS States" in this memorandum.

The QIS training includes several required components and these are: QIS classroom training, participation in a mock (simulated) survey, and participation in surveys of record including successfully completing two compliance assessments. These components are further described in this memorandum. Successful completion of all QIS training components will culminate in the student becoming a Registered QIS Surveyor. The designation as "Registered QIS Surveyor" indicates that the newly hired surveyor successfully completed the QIS training and is registered in the CMS Survey & Certification Learning Management System (LMS). The newly hired Registered QIS Surveyor continues to work as part of the team under an SMQT qualified and Registered QIS Surveyor preceptor. The newly hired surveyor who is a Registered QIS Surveyor must attend the BLTCC and receive a passing score on the SMQT to independently (that is, without supervision of an SMQT qualified surveyor) survey nursing homes to determine compliance with the requirements of participation.

II.   Basic Long Term Care Health Facility Surveyor Training Course

Chapter 4 of the SOM requires that all health facility surveyors employed in the Medicare and Medicaid programs successfully complete the BLTCC within the first year of employment. This requirement remains in effect with the implementation of the QIS process. As discussed above, the orientation of a newly hired surveyor generally takes about four months. If the State determines that the newly hired surveyor would be oriented to the QIS process and not the traditional survey process, it is expected that newly employed surveyors in a QIS State would complete the requirements and become Registered QIS Surveyors before attending the BLTCC.

III.   The Surveyor Minimum Qualifications Test (SMQT)

All nursing home surveyors are required to successfully complete the SMQT.

The SMQT addresses the knowledge, skills, and abilities needed to conduct surveys in nursing homes, and implements Sections 1819(g)(2) and 1919(g)(2) of the Social Security Act, which requires surveyors to meet minimum qualifications. The requirement for successful completion of the SMQT remains in effect with the implementation of the QIS process. It is not a requirement that the newly hired surveyor be SMQT qualified prior to participating in QIS training components.

(CMS Central Office staff are monitoring the SMQT to ensure that questions are applicable to survey investigations and decision making and not specific to the details of particular tasks of either the traditional survey process or the QIS process.)

IV.   CMS-Approved QIS Training Course Material

Only CMS-approved QIS surveyor training course material will be used to train surveyors and trainers. The CMS-approved QIS training materials (with CMS logo) include the procedures, processes, and forms that are used to support the QIS process.

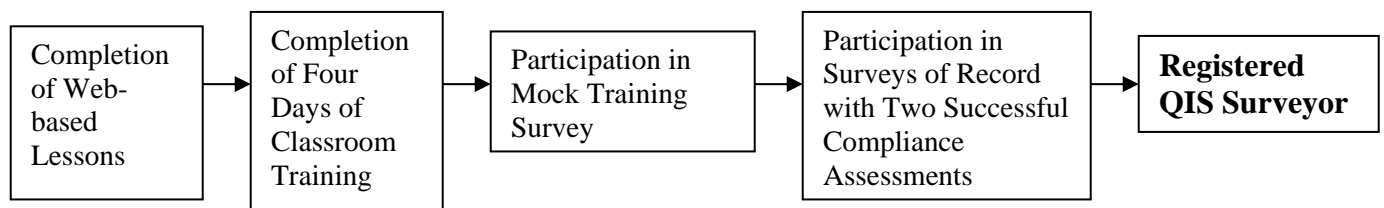## V.   CMS-Approved Training for Registered QIS Surveyors and Certified QIS Trainers

CMS has authorized Nursing Home Quality LLC (NHQ) to conduct the initial QIS training of selected State and CMS RO surveyors and the subsequent training of a State's designated QIS trainers. The training is intended to support the implementation of the QIS, which is a federally approved nursing home survey process, and as such, must be delivered in a uniform and consistent manner to achieve greater standardization. At this time, NHQ is the only CMS-approved QIS training entity and will be referred to as the CMS training entity in this document. Successful completion of all of the CMS QIS training components will result in CMS-approved QIS surveyors and trainers, as noted:

- Surveyors who successfully complete all QIS training components will be recognized as "Registered QIS Surveyors."

- From the pool of initial Registered QIS Surveyors who have successfully completed at least six QIS surveys of record, individuals will be selected by the SA to receive additional training to become "CMS Certified QIS Trainers." (The CMS training entity certifies to CMS that these individuals have met the requirements to train surveyors on the QIS process.)

NOTE: Surveyors trained by the University of Colorado during the QIS demonstration are recognized by CMS as Registered QIS Surveyors.

VI.   Training Process: Registered QIS Surveyor

CMS established the requirements for Registered QIS Surveyors that must be successfully completed. The training of surveyors in the QIS process is structured as described below:

Every SA or CMS RO surveyor must successfully complete prescribed training components to be considered a Registered QIS Surveyor whether the training is provided initially by CMS training entity or subsequently by a CMS Certified QIS Trainer. In addition to the data entered into LMS, States, and CMS ROs are required to maintain a paper record documenting the successful completion date of each of the discreet training components, including any necessary remediation training. The training of surveyors in the QIS process includes the following components:

- Web-based Lessons

Surveyors will initially complete a short series of Web-based learning modules prior to participation in the classroom training. The designated Web-based modules provide background information, a general overview of the QIS process, and an introduction to the software.

- Classroom Training

The classroom training uses the CMS-approved QIS surveyor training course manual, which incorporates various media presentations, lectures, exercises, computer tutorials, and discussions.

Generally, each class will be comprised of eight surveyors (two teams of four surveyors each). In the case that a SA wishes to have more than eight surveyors in one class at a time, consideration should be given to constructing teams of four surveyors each to assure there are a sufficient number of instructors to accompany each team on its mock survey and surveys of record. Class size will be determined by the State in consultation with the CMS training entity. If the State wishes to train additional survey teams, the State is expected to bear the expense and to make arrangements with the CMS training entity.

During the initial round of QIS training of core surveyors in a State, the State will assure that at least one first-line supervisor/manager with responsibility for QIS surveys and an informational technology (IT) staff person receives training in the QIS training process. The training for the IT staff member will include special breakout training sessions on IT support.

- Mock Training Survey

Immediately upon completion of the QIS classroom training portion, surveyors will be organized into two survey teams (of about four surveyors each) and each team will participate in a mock, or simulated, survey in a nursing home using the QIS process.

> **NOTE:** The QIS utilizes the QIS Data Collection Tool (DCT) software. Therefore, it is essential that the SA's IT staff be available immediately either on site at the nursing home or by telephone to support the training activities conducted in the field. In addition, the CMS-Certified QIS Trainer must be able to assist students in resolving technical issues.

The mock training survey is a learning opportunity and <u>not</u> a survey of record. During the mock training survey, two trainers (the trainers may be CMS-Certified QIS Trainers or the CMS-approved training entity) are present and working with the survey teams to assure that the surveyors understand and implement the QIS process correctly. The trainers will identify problems, if any, in the surveyors' adherence to the procedures and correct any problems identified. If there is a concern with the implementation of the QIS process by the surveyors, an additional mock survey would be conducted. A surveyor would not conduct surveys of record until instructor staffs are satisfied that the surveyor can independently conduct survey activities using the QIS. If necessary, additional classroom training or mock surveys would be conducted as a remediation activity before conducting surveys of record using the QIS process. The SA bears the expense of any further remediation activities required beyond the one remediation visit provided in the CMS contract with the CMS training entity.

- Surveys of Record with Compliance Assessments

Surveys of record will be conducted following the successful completion of the mock survey(s). During the first survey of record, two trainers are present to assess the surveyors' compliance with the QIS process and evaluate the extent to which surveyors are adhering to QIS procedures.

The first compliance assessment will be conducted during each surveyor's first survey of record. The second compliance assessment will be conducted usually during the second survey of record or, after one intervening survey (that is, during the third survey of record).

There should be no more than one intervening survey of record between the first and second compliance assessment. Surveyors must have two consecutive successes on their compliance assessments to become Registered QIS Surveyors. If a surveyor fails either of the two compliance assessments, additional compliance assessments will be conducted until there are two successful consecutive assessments. If additional compliance assessments are conducted by the CMS contractor, the State will bear the additional expense of this activity.

> **NOTE:** The rate of a State's QIS implementation and the availability of State resources may allow a State the ability to provide its experienced and SMQT qualified surveyors an opportunity to observe a QIS survey before attending the required QIS training.
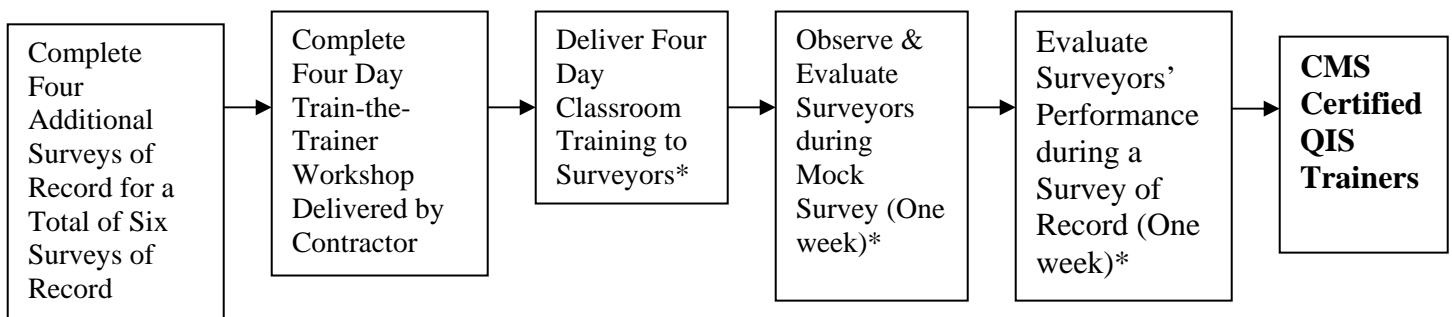
VII. Training Process: CMS-Certified QIS Trainer

CMS-Certified QIS Trainers provide QIS training to the State's surveyors. The CMS-Certified QIS Trainers function as a training team of two persons. CMS expects that each State will have a minimum of two teams of CMS-Certified QIS Trainers. If a State wishes to have more than the initial four trainers, the State bears the expense of training the additional two person teams as QIS trainers for the State. The State is expected to make arrangements with the CMS training entity regarding the cost of certifying additional or replacement QIS trainers.

Those selected to become CMS-Certified QIS Trainers must:

- Be Registered QIS Surveyors;
- Have participated in at least six QIS surveys of record; and
- Developed sufficient mastery of the QIS process to serve as an instructor/trainer.

To become a CMS-Certified QIS Trainer, Registered QIS Surveyors must successfully complete the following training components, under the tutelage of the CMS training contractor:

Complete Four Additional Surveys of Record for a Total of Six Surveys of Record → Complete Four Day Train-the-Trainer Workshop Delivered by Contractor → Deliver Four Day Classroom Training to Surveyors* → Observe & Evaluate Surveyors during Mock Survey (One week)* → Evaluate Surveyors' Performance during a Survey of Record (One week)* → **CMS Certified QIS Trainers**

* CMS training entity observes, instructs, monitors, and evaluates trainers-in-training delivering classroom training, observing, monitoring and evaluating the mock survey, and conducting the first compliance assessment of surveyor students.

Each trainer-candidate will have CMS training entity staff assigned to evaluate performance including the provision of individual debriefing sessions with the survey team after each of the training components. The CMS training entity staff will provide a performance rating on a Pass/Fail basis for each of the training components and notify the State of the trainer-candidate's performance.

Successful completion of the following training components is required to become a CMS Certified QIS Trainer:

Train-the-Trainer Workshop

Trainer-candidates will participate in a four-day train-the-trainer workshop, which will be held in a classroom setting in the State. Led by the CMS-approved training entity, this workshop will provide trainer-candidates specialized background information and knowledge of the QIS, including in-depth training on the QIS Data Collection Tool (DCT), classroom and onsite facilitation techniques, optimal use of the QIS process, protocols for assessing onsite compliance with the QIS process, and preparation for questions frequently asked by surveyors.

Instruct One Class of Surveyor-Students

Generally, four trainer-candidates will provide classroom training to a class of approximately eight surveyor-students with CMS training entity staff observer(s) participating at the classroom session. The class size may vary; however, the number of surveyors trained in the QIS is dependent on the trainers' ability to perform all of the training steps in a timely manner. The training components include classroom instruction, mock survey, two successful compliance assessments, and remediation training, if necessary.

The QIS classroom training session will be conducted as follows:

- The trainer-candidates rotate the presentation and instruction to provide the CMS training entity staff multiple opportunities for observation and evaluation of the trainer-candidates' delivery of the QIS training to surveyor-students.

- The CMS training entity staff will rate each trainer-candidate's performance during the classroom training on four components:
    - Knowledge of the QIS,
    - QIS computer skills,
    - Ability to articulate QIS concepts to the group, and
    - Ability to answer questions from the class.

- Each of the eight surveyor-students will evaluate the trainer-candidates. These evaluations will be considered in addition to the CMS training entity's evaluation of each trainer-candidate.

- Each of the four components of performance will be rated on a Pass/Fail basis. If a trainer-candidate fails any one of the four topic areas, he/she fails the classroom training component of the trainer certification process.

Evaluations of Surveyor-Students during Mock Surveys

There will be two trainer-candidates and four surveyor-students (generally), accompanied by the CMS training entity staff at each mock survey.

- Each trainer candidate will be evaluated by the CMS training entity on:
    - QIS knowledge,
    - QIS computer skills,
    - Ability to answer individual questions, and
    - Organizational skills.

- Evaluations will be rated on a Pass/Fail basis; and failure of any of the four components will result in failure on the mock survey training component of the trainer certification process.

Oversight of First Survey of Record with Compliance Assessment

There will be two trainer-candidates, usually four surveyor-students, and one or two CMS training entity staff at the first survey of record.

- Each trainer-candidate will be evaluated by the CMS training entity based on:
    - Individual QIS knowledge,
    - QIS computer skills, and
    - Ability to apply the CMS-approved compliance assessment and use of forms to conduct the first compliance assessment of surveyor-students.

- Evaluations of the trainer-candidates will be rated on a Pass/Fail basis, and failure on any of the three components will result in failure on the survey of record component of the trainer certification process.

VIII.   Roles of Trainer-Candidates and Surveyor-Students

As described above, the training approach developed for QIS requires surveyors in each State to first master the QIS process and become Registered QIS Surveyors. The trainer-candidates have conducted QIS surveys of record and achieved proficiency with the QIS. The trainer-candidates have completed an intensive train-the-trainer workshop. Through these processes, the States' trainer-candidates have developed a unique body of knowledge and achieved a level of expertise that they will pass on to surveyor-students in the classroom and in the other training components.

Many QIS surveyor-students participating in the training are seasoned SMQT-qualified surveyors, supervisors, or RO staff, all with proven proficiency in the traditional survey process.

However, in the QIS classroom training, mock survey, and survey of record with compliance assessment, the QIS surveyor-students are the learners. To optimize the learning experience, it is essential that the surveyor-students be open-minded about the QIS process and respect the leadership and expertise of the CMS-Certified QIS Trainers and QIS trainer-candidates. The training process includes the requirement that the QIS trainer-candidates conduct evaluations of the surveyor-students' use of the QIS process. These evaluations are not intended to critique the surveyor-students skills; rather, the intent is to ensure the consistent and accurate implementation of the QIS process as approved by CMS.

IX.   Failure to Complete Required Training Criteria

In the event that a trainer-candidate fails any component of the training, the costs associated with remediation training for QIS trainer-candidates are the responsibility of the SA.

X.   Certification of Additional or Replacement QIS Trainers

The QIS is a computer-assisted nursing home survey process. It requires the surveyor to learn a new survey process and use technology to an extent not required with the traditional nursing home survey process. It is important that the QIS trainers successfully complete all components of the training and the approved training entity certifies to CMS that trainers in the QIS have mastered the process and are able to effectively instruct surveyors in the new process. This certification process for QIS trainers does not presently extend to CMS-Certified QIS Trainers being qualified to train other trainers. CMS intends to re-examine the processes for training CMS-Certified QIS Trainers as additional experience is gained with the implementation of the QIS.

The trainer certification status awarded to each individual who has successfully completed the QIS trainer program remains in effect as long as the individual is actively involved in the QIS process. To be considered actively involved, the CMS-Certified QIS Trainer is expected to conduct a minimum of two SA QIS trainings of all components (classroom, mock, compliance assessments) per year or participate as a survey team member in at least one QIS survey per quarter. A trainer's name will be removed from the LMS as a "CMS-Certified QIS Trainer" if the individual is not actively involved.

XI.   Documentation of Successful Completion of Training

The CMS Survey and Certification Learning Management System (LMS) records the successful completion of training as "Registered QIS Surveyors" and the successful completion of training as "CMS-Certified QIS Trainers." The Training Staff in the Survey and Certification Group in Central Office issued instructions to the State Training Coordinators (STCs) in the QIS States and the corresponding Regional Training Administrators (RTAs) regarding documentation of the QIS training information in the LMS. Completion of the QIS training requirements for surveyors and trainers must be documented timely in the LMS as previously instructed by CMS so that surveyors can conduct QIS surveys.

In addition to the data entered into LMS, States and CMS ROs are required to maintain a paper record documenting the successful completion dates for each discreet training component, including any necessary remediation training.

XII.   CMS RO Staff Participation in QIS Training

Two RO SMQT-qualified long term care surveyors are expected to participate as students in a State's QIS training; however, the two RO surveyors need not participate at the same QIS training session. The selected RO surveyor(s) will travel to the State within their region that is conducting the QIS training. The RO participation during the first cycle of QIS training that is conducted by the State's trainer-candidates is an opportune time as this first cycle of QIS training will be observed by the CMS-approved training contractor.

The RO surveyors nominated to complete QIS training to become Registered QIS Surveyors should have:
- Recent long term care survey experience,
- Intermediate computer skills (e.g., use of a flash drive, data management using Folders, Import/Export functions, and Microsoft Word processing),
- Ability to master new technology,
- Excellent communication skills, and
- Leadership ability, including any prior experience as a trainer or instructor (as these individuals will be the RO's future CMS-Certified QIS Trainers).

The RO surveyors are students in this learning experience and the State's QIS trainer-candidates are the instructors. The RO surveyors participate in all aspects of the QIS training including classroom, mock survey, compliance assessments, and six surveys of record (conducted consecutively if possible, to maximize learning and minimize disruption). The two compliance assessments of the RO surveyors will be conducted by the State's QIS trainer-candidates. It is expected that the two RO surveyors will each be embedded with a different State survey team (one RO surveyor per State QIS team). By being embedded, the RO surveyor will participate as a member of the team, receiving survey assignments and carrying out the same survey functions as other members of the team. The RO surveyor who is learning the QIS process will also need to become proficient performing some of the team coordinator functions such as, using the primary laptop. The RO surveyors will receive the same QIS training as SA surveyors to become Registered QIS Surveyors.

In the future, in order for an RO's Registered QIS Surveyors to become CMS-Certified QIS Trainers, the RO's Registered QIS Surveyors must complete the same QIS training process as the States' Registered QIS Surveyors to become CMS-Certified QIS Trainers. A CMS consortium may decide to develop a blended training team consisting of two RO Registered QIS Surveyors from different ROs within the consortium to receive training to be CMS-Certified QIS Trainers. We expect that this next phase of training the ROs' Registered QIS Surveyors to become the ROs' Certified QIS Trainers of the QIS process would not begin until about FY 2009 because until that time there would not be sufficient QIS survey volume to warrant the RO training additional RO surveyors in the QIS process.

As the CMS training entity instructs initial core teams of surveyors, supervisors, and IT staff in new States, a CMS RO informational technology (IT) expert should participate with the State's IT experts in receiving the specialized QIS IT training.

XIII. CMS RO Oversight of the QIS Process in an SA

The QIS surveys of record that include RO surveyor participation will be counted toward the statutory five percent (5 %) survey workload. CMS Central Office provided instruction to the CMS ROs of States implementing the QIS process. These instructions, *Procedure for Regional Office Quality Indicator Survey Documentation,* must be followed to assure successful documentation in the Federal Oversight/Support Survey (FOSS) Database of survey data.