

Coronavirus (COVID-19): Impact on Site Surveys

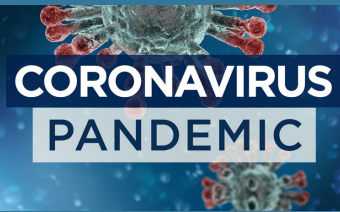
Transplantation is one of the most highly regulated fields in the medical industry, however, conducting site surveys in the midst of a pandemic puts us in unprecedented and uncharted territory. Highlights of changes to CMS and OPTN|UNOS site surveys during the COVID-19 pandemic are outlined below.

Impact on CMS Site Surveys

- To date CMS has issued two QSO Memorandums with regards to CMS surveys during the COVID-19 pandemic:
 - QSO-20-12 was issued March 4
 - QSO-20-20 was issued March 23
- Based upon these QSO Memorandums, CMS site surveys will be limited to the following types of surveys:
 - Complaint/facility-reported incident surveys
 - Targeted infection control surveys
 - » A streamlined review checklist will be utilized to minimize the impact on provider activities, while ensuring providers are implementing actions to protect the health and safety of individuals to respond to the COVID-19 pandemic.
 - » Hospitals and transplant programs can use this infection control survey checklist to perform a self-assessment of their infection control plan and protections.
 - Initial certification surveys in accordance to current guidance and prioritization.
- Key Focus Areas for COVID-19 Related CMS Surveys:
 - Improper transmission precautions procedures
 - Lack of staff knowledge of transmission precautions
 - Improper staff use of PPE and/or inadequate hand hygiene
 - High-risk, significant environmental cleaning issues
 - Ineffective and/or improper laundering of linens
 - Possible Infection Control (IC) surveillance program issues - also consider how influenza & pneumococcal programs are managed
- Standard Surveys **NOT BEING CONDUCTED** during the COVID-19 Prioritization Period:
 - Hospitals
 - Long term care facilities (nursing homes)
 - Home health agencies (HHAs)
 - Intermediate care facilities for individuals with intellectual disabilities (ICF/IIDs)

Impact on OPTN Transplant Site Surveys

- Site surveys will be conducted virtually at least through the end of June.
- Members will receive a phone call from Member Quality six to eight weeks before their scheduled site survey to see if it is a good time for the survey to take place.
- If it is not a good time, members can request a delay when they receive the phone call or they can pre-emptively submit a delay request by emailing MQFeedback@UNOS.org.
 - Include the following information: Name, Position, Contact Information, Organization/Code, Circumstances that make survey delay necessary
 - Member Quality will reach out to postponed programs every four to six weeks to see if it is a good time yet for the survey to be conducted. If not, the survey will be delayed for another four to six weeks. This process will be repeated until the survey can be scheduled.
- Virtual surveys can be conducted using secure Go To Meeting platform.
- Medical records reviews can be done virtually via SFTP drop box (secure file share), screen sharing, or secure email.
- Member Quality is closely monitoring the COVID-19 impact on members and adjusting survey schedules and processes accordingly.
 - For up to date information go to <https://unos.org/covid/> or email MQFeedback@UNOS.org.



The information presented in this issue is current as of April 2020. We recommend checking the UNOS and CDC sites regularly for updates and new developments.

Resources

CMS QSO Memorandums

- <https://www.cms.gov/files/document/qso-20-12-all.pdf>
- <https://www.cms.gov/files/document/qso-20-20-all.pdf>

CMS Surveyor Training Materials - Non-LTC

- <https://qsep.cms.gov/data/275/COVID-19FocusedSurvey-InfectionControlSurveyToolforNon-LTC.pdf>
- <https://qsep.cms.gov/data/275/COVID-19Focused%20Survey%20SummaryTableforNon-LTC.pdf>
- <https://qsep.cms.gov/data/275/COVID-19FocusedSurvey-TrainingSlidesforNon-LTC.pdf>

CMS COVID-19 FAQ's

- <https://www.cms.gov/medicare/quality-safety-oversight-general-information/coronavirus>

OPTN|UNOS COVID-19 Information

- <https://optn.transplant.hrsa.gov/news/information-for-transplant-programs-and-opos-regarding-2019-novel-coronavirus/>
- <https://unos.org/covid/>

CDC COVID-19 Infection-Control

- <https://www.cdc.gov/coronavirus/2019-ncov/index.html>