



Center for Clinical Standards and Quality /Survey & Certification Group

Admin Info: 13-20-Transplant

DATE: March 8, 2013

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Transplant Program Surveys Conducted by SA Surveyors

Memorandum Summary

Changes to Transplant Program Surveys – To increase efficiency, we are (a) revising the transplant center survey process, (b) shifting more continuous monitoring of patient survival and graft outcomes to CMS central office, and (c) adjusting the frequency of onsite recertification surveys.

Supplemental Funds for Transplant Surveys – To meet budget reductions pursuant to the so-called Sequester, supplemental funds for transplant surveys will no longer be available to States for transplant survey activities.

Transplant Survey Transitions- We will work with individual States to effect a transition to the new system.

A. Background

Transplant survey activities are currently divided between States that perform transplant surveys and the CMS National Contractor that performs transplant surveys for the other 26 States. In the States that perform transplant survey activities, many only perform only a few surveys each year. The Conditions of Participation (CoPs) for Transplant Programs are quite different from those of other programs. They require separate surveyor training courses and need for frequent updates. The specialty of transplant medicine is also highly complex and dynamic. Such complexities present a challenge for surveyors. In addition, we are challenged to identify methods that can promote the optimum efficiencies and effectiveness in the survey and enforcement processes.

B. Efficiency and Effectiveness

CMS is currently preparing changes in the transplant survey process to focus more attention on data and quality of care. A pilot will begin shortly using the CMS Contractor. Our goal is to improve survey efficiency and to make the process more effective in assessing quality of care and outcomes. With feedback and evaluation of the pilot, our hope is to better identify the areas of quality that cause non-compliance with the CoP requirements, and increase efficiency in the oversight endeavor. As part of this overall effort, we plan to transition 100% of the transplant center recertification surveys to the CMS National Contractor.

C. Sequester Effects

Budget reductions are required by the Sequester enacted by Congress. We are therefore discontinuing the supplemental financial allocations to States for the conduct of onsite surveys of solid organ transplant centers. We will provide such supplements to States for:

1. Surveys already conducted or scheduled to be conducted through April 2013, and
2. Surveys that will be conducted in the future (beyond April 2013), when such surveys are desirable in order to avoid negative impact on State surveyors who have been specially trained for transplant surveys and who would be adversely affected by any abrupt cessation of State-conducted surveys.

Your CMS Regional Office will be in touch with you in the next two weeks to discuss State-specific considerations.

D. Continuing State Transplant Responsibilities

1. States will still be responsible for
 - a. Receiving complaints,
 - b. Entering received complaints into the ACTS system,
 - c. Assisting the National Contractor in a complaint investigation in those limited number of cases when issues, related to the transplant center complaint, extend to the larger acute care hospital.

E. Request

For those States that are performing transplant center surveys, please inform your CMS Regional Office by March 20, 2013 with regard to:

- (a) Transplant center surveys that the State has conducted and will conduct through April 2013.
- (b) Transplant center surveys that the State would like to conduct:
 - (i) Between May 1 and September 20, 2013, and
 - (ii) After September 30, 2013, in order to avoid negative impact on State surveyors who have been specially trained for transplant surveys and who would be adversely affected by any abrupt cessation of State-conducted surveys.

Please address any questions or concerns to your CMS Regional Office. The Central Office contact for the Regional Offices is Michele Walton at Michele.walton@cms.hhs.gov.

/s/

Thomas E. Hamilton

cc: Dr. Daniel Schwartz
Survey and Certification Regional Office Management