

Moving Forward Coalition

Federal Policy Recommendations

Work Smarter Not Harder *Getting the Risk-Based Survey Right*

The Issue:

The federal government, through state survey agencies, conducts a recertification survey of all nursing homes every nine to 15 months to ensure the safety and well-being of residents. Though prior to 2020, many state agencies were behind in standard certification and complaint surveys, the COVID pandemic (in conjunction with a flat-lined federal oversight budget) has deepened that hole considerably. According to a [Senate Special Committee on Aging report](#), nearly one in nine nursing homes have not had a survey in two years. These delays threaten residents' safety, dignity, and quality of life.

“ NASEM Recommendation 5B:

The Centers for Medicare & Medicaid Services (CMS) should develop and evaluate strategies (including the evaluation of potential unintended consequences) that make nursing home quality assurance efforts more effective, efficient, and responsive, including potential longer-term reforms such as...enhanced data monitoring (using prior survey performance in combination with real-time quality metrics) to track performance and triage on-site inspections of facilities.

The Federal Policy Landscape:

After a preliminary notice in [December 2023](#), CMS officially announced in [April 2024](#) that it “is testing a risk-based survey (RBS) approach that allows consistently higher-quality facilities to receive a more focused survey that takes less time and resources than the traditional standard recertification survey, while ensuring compliance with health and safety standards.” Since then, CMS has begun to [notify individual state agencies](#) of their participation. Piloting a well-designed RBS could be a useful step toward helping survey agencies catch up and keep up.

Coalition Action:

Between April and October 2023, members of the Coalition met with state survey agency staff and directors to learn how they thought the recertification survey could be made more efficient for high-performing nursing homes, while relieving surveyors of burdensome tasks. They documented those ideas and shared their recommendations with CMS's Division of Nursing Homes.

Proposed Solution:

We believe CMS should explore four areas for efficiency in the RBS, designated for high-performing facilities.

1. Reduce the survey process to two-days – focusing the first day on a smaller number of resident interviews (with enhanced focus on individual goals, preferences, and priorities) and the second day on recording reviews related to highest risk areas.

2. Eliminate redundant activities within the survey process. Surveys include 40 independently constructed critical element pathways. All of them are important, but some have redundancies that may not be a good use of surveyors' time. For example, the "Nutrition" and "Hydration" evaluation pathways, as well as the "Urinary Catheter" and "Urinary Tract Infection" pathways, have substantial overlap and could be combined into a single pathway, respectively.
3. Eliminate redundancies across quality assurance agencies. For example, kitchen safety inspections are performed in many states by local departments of health.
4. Narrow the focus on the entrance conference. The entrance conference is when surveyors meet nursing home leaders at the start of the unannounced survey and collect a lot of data, not all of which may be used during the survey. Where possible, data collection could take place off-site in advance of the survey or when data becomes relevant during the survey (irrelevant items could be removed entirely within an individual RBS).

As CMS pursues this promising approach to survey efficiency, we hope they reach out to stakeholders for feedback, rigorously evaluate the effectiveness of the new approach in diverse nursing homes, and continue to make changes to improve the RBS over time.

In its 2022 report, [The National Imperative to Improve Nursing Home Quality](#), the National Academies of Sciences, Engineering & Medicine made a set of bold recommendations for federal policies to improve nursing home quality. Picking up where they left off, members of the Moving Forward Coalition prioritized three of these recommendations and worked together to develop the consensus and specificity to make them actionable for federal policymakers.

This one-page brief presents Moving Forward-backed steps CMS can take to make nursing home quality assurance more efficient. We hope you will share it with your representatives, policymakers, and community leaders to spur dialogue about actionable opportunities to improve nursing home quality for all residents, care partners, and staff members.

Together, we can move from action plans to action.