

# Advisory Notice Notice No: 2023-HC08

#### DNV Healthcare USA Inc.

Advisory Notices are designed to provide official information relative to Hospital Accreditation and Certification activities. Should you have any questions about the content of this notice, please e-mail <a href="mailto:dnvclientdropbox@dnv.com">dnvclientdropbox@dnv.com</a>.

Date: June 29, 2023

Subject: Accreditation Process Changes - Unannounced Surveys, Exclusion Dates, and Complaint

Investigations

Distribution: All DNV Accredited or Certified Hospitals, Applicant Hospitals, DNV Employees, and Interested

**Parties** 

Approved By: DNV Healthcare Standards Application and Interpretation (SAI) Team / Troy D. McCann, Director,

**DNV Healthcare Regulatory Affairs** 

On Friday, June 16, 2023, CMS Center for Clinical Standards and Quality/ Quality, Safety & Oversight Group released a letter with guidance to all Accreditation Organizations (AOs) addressing inconsistencies between AOs and State Agencies (SAs) related to unannounced surveys and the use of advance notifications, announcements, blackout dates (exclusion dates), as well as contact with facilities prior to onsite complaint investigations.

CMS provided this guidance to ensure consistency to the survey process and to improve patient health and safety. As a result of this guidance, DNV Healthcare anticipates changes to exclusion date policies, certain planning communications related to deemed accreditation surveys, and complaint investigation procedures. CMS requires us to submit program changes for review by July 14, and effective dates for most changes will be driven by CMS approvals. Watch for additional Advisory Notices from DNV Healthcare.

## **Unannounced Surveys**

CMS is aware that some AOs are notifying facilities of the AO survey team arrival prior to arriving onsite. DNV Healthcare deemed accreditation surveys have always been unannounced and the DNV accreditation process does not include a provision for advance notification, except for certain remote survey activities conducted during HHS Public Health Emergency situations.

DNV Healthcare specialty certifications, training courses, and other non-accreditation-related activities may be announced and will continue to be scheduled in collaboration with our customers.

## **Exclusion Dates**

CMS has stated that allowing facilities to request dates when they wish not to be surveyed is not consistent with CMS' survey expectations. While current DNV exclusion date policies are clear that the wishes of the facility may not be guaranteed, CMS believes this practice is inconsistent with unannounced surveys and the expectation that a provider/supplier must be "survey-ready" at all times.

Due to the forward-looking nature of survey exclusion requests and our scheduling lead time of 90 days, DNV will no longer accept or acknowledge updates to survey exclusion weeks, effective with this Advisory Notice. This applies to the DNV Healthcare facility profile on dnvhealthcare.com or dnvhealthcareportal.com, or through any other communication channels. Exclusion requests that have already been submitted are subject to reconsideration or removal.

### **Complaint Investigations**

CMS has determined that administrative reviews or offsite complaint investigations are inconsistent with CMS survey processes. DNV Healthcare is reviewing our complaint investigation procedures to determine any changes we may need to submit to CMS. We will publish a new Advisory Notice when those changes are approved by CMS.

Any questions or comments can be forwarded to the Healthcare Client Drop Box: dnvclientdropbox@dnv.com.

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Regards, For DNV Healthcare USA Inc.

**Standards Application and Interpretation (SAI) Team** DNV Healthcare Regulatory Affairs

#### **REFERENCES:**

QSO Policy Memorandum 09-41 CMS.gov Policy Memorandum SC Letter 09\_41 CMS Letter Issued to All AOs on June 16, 2023 CMS Letter to All AOs June 16, 2023