



Center for Clinical Standards and Quality/Survey & Certification Group

Admin Info: 14-28-NH

DATE: July 3, 2014

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Survey of State Survey Agency (SA) and Regional Office (RO) Survey Managers and Surveyors on Dialysis Services in Nursing Homes (Skilled Nursing Facilities (SNF)/Nursing Facility (NF))

Memorandum Summary

- **Review and Revision:** The Centers for Medicare and Medicaid Services (CMS) is reviewing a prior Survey and Certification (S&C) Memorandum 04-24 “Clarification of Certification Requirements and Coordination of Care for Residents of Long-Term Care (LTC) Facilities Who Receive End Stage Renal Disease (ESRD) Services for additional information and guidance that may be needed.
- **Release of Dialysis Care Survey Questionnaire:** As part of our data-gathering effort, CMS is releasing a questionnaire for RO and SA nursing home surveyors, and their respective managers who review dialysis care for residents in a nursing home. CMS will use the results of the survey to develop policy and interpretive guidance related to the provision of dialysis; and to develop training for surveyors related to dialysis provided in nursing homes. The surveys will be open and available for completion until **July 30, 2014**.
- **Follow up call Planned:** CMS is in the process of planning a follow up call for RO and SA managers and surveyors to discuss the results of the survey. The date for this call will be provided at a later time.

The CMS Division of Nursing Homes (DNH) is conducting a survey intended to elicit information regarding surveying for the provision of home hemodialysis (HHD) and/or peritoneal dialysis provided in a nursing home (SNF/NF or NF) by End Stage Renal Disease (ESRD) trained nursing home staff or ESRD trained contracted staff.

Background

On March 19, 2004, CMS released Survey and Certification (S&C) Memorandum 04-24 regarding the “Clarification of Certification Requirements and Coordination of Care for Residents of Long-Term Care (LTC) Facilities Who Receive End Stage Renal Disease (ESRD) Services.” Since that time, the ESRD Conditions for Coverage (CfC) were revised in October of 2008. CMS is in the process of reviewing the provision and/or guidance related to home hemodialysis (HHD) and peritoneal dialysis provided in a nursing home setting. According to §494.10, “Home dialysis means dialysis performed at home by an ESRD patient or caregiver who

has completed an appropriate course of training as described in § 494.100(a) of this part.” The nursing home is considered the resident’s home for purposes of the home dialysis benefit.

Currently, if a nursing home has chosen to allow for the provision of onsite HHD, the treatments are provided in collaboration with a Medicare certified dialysis facility. If the nursing home allows the provision of HHD, the nursing home must, in collaboration with the dialysis facility, assure that the dialysis needs of the resident are met in a safe manner. Both the ESRD facility and the nursing home are accountable for the coordination and quality of dialysis services delivered to nursing home residents. In addition, the ESRD CfC located at 42 CFR §494.100 - V581, states that a dialysis facility that is certified to provide services to home patients must ensure through its interdisciplinary team, that home dialysis services are at least equivalent to those provided to in-facility patients and meet all applicable conditions of part 494.

At this time, for a nursing home resident who requires chronic dialysis treatments, there are several options that exist including:

- Being transported to and from the off-site ESRD facility for hemodialysis or peritoneal dialysis treatments; or
- Being transported to a location within the nursing home building which is dedicated for and separately certified as an ESRD facility (obtains and retains an outpatient ESRD certification number);

NOTE: In the two bulleted options above, the nursing home resident’s dialysis care/treatments are provided within the confines of a separately certified ESRD facility. All certified ESRD facilities must be in compliance with the requirements of the 2008 ESRD Conditions for Coverage (CfC), Interpretive Guidance, and are surveyed using the ESRD Core Survey processes.

- Receiving dialysis care/treatments (under the care of an offsite ESRD) in the residential area of the nursing home through home hemodialysis. The home hemodialysis treatments may be provided by:
 - Staff employed by the certified ESRD facility (Staff-assisted home dialysis); or
 - Staff employed by the nursing home who are trained by the ESRD facility.

For Medicare reimbursement of home hemodialysis, the patient or his or her caregiver must have completed a training program provided by a certified ESRD facility approved for home dialysis training and support.

Dialysis Care Survey Questionnaire

This survey is intended to elicit information from RO and SA nursing home surveyors and managers regarding the care of a resident who is receiving home hemodialysis or peritoneal dialysis in a nursing home (SNF/NF or NF) by ESRD trained nursing home staff or ESRD trained contracted staff. In addition, the survey will assist in the identification of nursing homes

that provide home hemodialysis, procedures/methods to track the provision of this service and review training needs of the survey staff regarding dialysis care.

Location and Deadline

These survey questionnaires are intended for RO and SA nursing home surveyors, and their respective managers. The surveys will be open and available for completion until **July 30, 2014**.

Questionnaire for SA Managers on Dialysis Services in Nursing Home

<https://www.surveymonkey.com/s/dialysissamanagers>

Questionnaire for RO Managers on Dialysis Services in Nursing Home

<https://www.surveymonkey.com/s/dialysisromanagers>

SA Surveyor Questionnaire for Dialysis Services in Nursing Homes (SNF/NF or NF)

<https://www.surveymonkey.com/s/dialysis-sa-surveyors>

RO Surveyor Questionnaire for Dialysis Services in Nursing Homes (SNF/NF or NF)

<https://www.surveymonkey.com/s/dialysis-ro-surveyors>

Results of the Survey

The survey results will be compiled and used to develop policy and interpretive guidance related to the provision of dialysis care in a nursing home and will also be used to identify and develop training for surveyors related to dialysis care provided in nursing homes.

In addition, CMS is planning a follow up call for RO and SA managers and surveyors to discuss the results of the survey. The date for this call will be provided at a later time.

Effective Date: Immediately. Surveys will be available for completion as of the release of this memorandum until July 30, 2014.

/s/

Thomas E. Hamilton

cc: Survey and Certification Regional Office Management