The Accreditation Option for Deemed Medicare Status

The Center for Medicaid and Medicare Services (CMS) directed State Survey Agencies (SSAs) in its November 5, 2007 Survey and Certification Letter (S&C-08-03) to reprioritize their Medicare survey activities. CMS assigned initial certification surveys to the lowest tier (4) of its four-tiered survey priority matrix. It specifically instructed SSAs to make complaint investigations, recertification surveys, and other infrastructure work for existing Medicare providers a higher priority compared with certification of new Medicare providers.

The operational implications of this mandate are significant for the OLC, as well as for providers seeking CMS certified provider status. The OLC will not conduct initial certification surveys until it has first completed all of its higher priority survey activities. Providers seeking an initial certification survey are advised that there may be a considerable delay before OLC is able to schedule these surveys.

Many providers have the option of attaining accreditation that conveys deemed Medicare status by participating in an initial survey conducted by a CMS-approved accreditation organization (AO) in lieu of a Medicare survey conducted by a SSA or by CMS. This deemed-status accreditation is likely to be the fastest route to certification. While there is no cost associated with a CMS or SSA survey, resource limitations and CMS’ affirmation of its survey priorities severely limits the number of initial certification surveys that will be conducted nationally, as well as in Virginia. Many provider applicants have concluded that the benefits of an AO survey are worth the expense, particularly the expense of waiting for a no-cost SSA or CMS survey.

CMS has identified three AOs whose accreditation it has deemed for Medicare certification purposes. The contact information for these AOs is below:

Community Health Accreditation Program (CHAP)
1300 19th Street NW
Suite 150
Washington, D.C. 20036
Contact Person: Gail Surrency
202-862-3413
800-656-9656, ext.12
gsurrency@chapinc.org

Joint Commission for Accreditation of Health Care Organizations (JCAHO)
601 13th Street NW
Suite 1150N
Washington, D.C. 20005
Contact Person: Trisha Kurtz
202-783-6655
pkurtz@jcaho.org
Providers must complete their OASIS Test prior to their initial survey. In addition, they must have admitted a minimum of 10 skilled care patients prior to the survey. At least seven of those patients must be actively receiving services on the day of the survey. The initial certification survey will be immediately terminated should the OLC learn that the provider has not admitted the required minimum number of Medicare patients.