



2023 The CMS Hospital Conditions of Participation (CoPs)

Laura A. Dixon, BS, JD, RN, CPHRM
303-955-8104

This five-part online seminar series will cover the entire CMS Hospital CoP manual – Appendix A. It is a fantastic way to educate everyone in your hospital on all the sections of the CMS hospital manual, especially ones that apply to their department. This program will discuss the most problematic standards and how the hospital can do a gap analysis to assist in compliance with the CoPs.

Every hospital that accepts payment for Medicare and Medicaid patients must comply with the Centers for Medicare & Medicaid Services Conditions of Participation. The manual has interpretive guidelines that must be followed for all patients treated in the hospital or hospital owned departments. Facilities with deemed status accredited by the Joint Commission (TJC), HFAP, CIHQ, and DNV Healthcare must follow these regulations.

Sections addressed include medical record services, dietary, utilization review, emergency department, surgical services, anesthesia, PACU, medical staff, nursing services, lab, outpatient department, rehabilitation, radiology, respiratory, physical environment, pharmacy, infection control, organ and tissue, patient rights, and discharge planning.

The interpretive guidelines serve as the basis for determining hospital compliance and though some changes from 2020 continue to have interpretive guidelines and survey procedures pending, hospitals are still expected to comply with the regulations. This program will include the 2020 changes, where the gaps continue – absence of interpretive guidelines and survey procedures, and any recent updates.

CMS developed worksheets for assessing compliance with the QAPI, discharge planning standards and infection control. Though no longer utilized by State and Federal surveyors, the worksheets are available as excellent self-assessment tools for hospitals. These three worksheets will be covered.

Part Two of Five: Patient Rights: Advance Directives, Consent, Interpreters, Grievances, Exercise of Patient Rights, Disclosures, Privacy, Safety, Ligature Risks, Abuse and Neglect, Confidentiality, Restraints and Visitation



Objectives:

- Recall that CMS has restraint standards that hospitals must follow
- Describe that a hospital must have a grievance policy and procedure in place
- Recall that interpreters should be provided for patients with limited English proficiency and hearing impairment
- Describe how non-physician practitioners – PA, NPs – can order restraints

Agenda

1. Patient Rights
 - a. Final changes
 - b. Patients timely access to their medical records
 - c. Notice of rights to be provided
 - d. Designation of representative
 - e. IM notice – Medicare patients
 - f. OCR Section 1557
 - g. Interpreters
 - h. Low health literacy
 - i. Grievances and procedure
 - j. “7-Day” rule
 - k. Understanding of patient advocate/support person
 - l. Advance directives
 - m. Informed consent
 - n. Patient representative
 - o. Family member and doctor notification
 - p. Privacy and confidential
 - q. Care in a safe setting
 - r. Safety of behavioral health patients
 - s. Ligature risks
 - t. Freedom from abuse and neglect
 - u. Criminal background checks
 - v. Access to medical records
 - w. Privacy and confidentiality memo
 - x. PA ordering restraints
 - y. Restraint and seclusion- types and requirements
 - z. Less restrictive methods and alternatives
 - aa. Plan of care
 - bb. Documentation
 - cc. One-Hour rule
 - dd. Staff education
 - ee. Visitation rights



Continuing Education:

The Kentucky Hospital Research and Education Foundation is an approved Kentucky Board of Nursing continuing education provider. This offering number 5-0023-12-23-0-20 is approved for 2.4 contact hours. Participants must attend the entire session, complete the post-session evaluation, and provide nursing license number in order to receive contact hours and be awarded a certificate. No partial credit will be given. The Kentucky Board of Nursing Approval does not constitute endorsement of program content.

Registration:

KHA is pleased to offer this webinar to all member hospitals at a single charge per facility rate. Register for your hospital and share the login information with your whole team to ensure your staff receives necessary continuing education!

Member Rate: \$225.00

Contact [Tammy Wells](#) for more information or assistance registering.