



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Aging and Long-Term Support Administration
PO Box 45600, Olympia, WA 98504-5600

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ALTSA: ICF/IID #2015-003

DRAFT REVISION OF ICF/IID STATE OPERATIONS MANUAL (SOM), APPENDIX J

Dear ICF/IID Superintendent/Administrator:

The Centers for Medicare and Medicaid Services (CMS) recently issued S&C Memo 15-20-ICF/IID, including draft revisions to the ICF/IID SOM Appendix J - Interpretive Guidelines (IGs).

The purpose of the revisions is to clarify the intent of the Conditions of Participation (CoPs) as well as represent current standards of practice in the field. The format of the IGs will also change to include removing probes and procedures from the IGs and placing them into a separate Exhibit in the SOM.

- State ICF/IID Complaint Investigators, Survey/Certification Staff reference the SOM - Appendix J and IGs during complaint investigations and surveys and assess a facility's compliance with these regulations, including whether individuals are receiving needed active treatment services.
- This is the first change to the IGs in over 20 years.
- The federal regulations remain unchanged. However this revision has provided a more concise clarification of the regulation intent and represents current standards of practice in the field of ICF/IID. Therefore, the ICF/IID Complaint Investigators and Survey/Certification Staff will evaluate a facility's compliance based on the new Interpretive Guidelines – this could present a different expectation for compliance than the previous guidelines.
- CMS has not reported when final documents will be officially published in the SOM but have indicated there may be some slight changes to these new revisions once published.
- ICF/IID Complaint Investigators and Survey/Certification Staff will continue to follow the old IGs until the final documents are published.
- Once the IGs are published in the SOM, State ICF/IID Complaint Investigators and the Survey/Certification Staff will immediately reference the new IGs when investigating complaints and performing surveys.
- We recommend the ICF/IID providers become familiar with the new IGs.
- An advanced copy of the IGs revisions is available on the CMS website:
<http://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-15-20.pdf>

For more information, contact Penny Rarick, Policy Program Manager, at (360) 725-3210.

Sincerely,


Carl I. Walters II., Director
Residential Care Services

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