

Nursing Home Quality Assurance & Program Improvement

Background

The Centers for Medicare & Medicaid Services (CMS) is undertaking a bold initiative to broaden quality assurance and performance improvement activities (QAPI) in nursing homes. The existing Quality Assessment and Assurance (QAA) provision at 42 CFR, Part 483.75(o) specifies the QAA committee composition and frequency of meetings in nursing facilities and requires facilities to develop and implement appropriate plans of action to correct identified quality deficiencies. This provision provides a rule but not the details as to the means and methods taken to implement the QAA regulations. CMS is now reinforcing the critical importance of how nursing facilities establish and maintain accountability for QAPI processes in order to sustain quality of care and quality of life for nursing home residents.

In March 2010, Congress passed the Affordable Care Act. The Provisions set forth at Section 6102 (c) of the Affordable Act provide the opportunity for CMS to mobilize some of the best practices in nursing home QAPI and to identify technical assistance needs in advance of a new QAPI regulation. The provision states that the Secretary (delegated to CMS) shall establish and implement a QAPI program for facilities that includes development of standards (regulations) and provision of technical assistance on the development of best practices in order to meet such standards. This new provision significantly expands the level and scope of required QAPI activities to ensure that facilities continuously identify and correct quality deficiencies as well as sustain performance improvement.

Beginning in September 2011, CMS launched a prototype QAPI program for testing of QAPI tools and resources in a small number of homes. The results of this demonstration, as well as consumer, provider and stakeholder feedback, was used to establish a QAPI tools and resources geared towards helping facilities to upgrade their current quality programs using a best practices approach.

Section 6102 (c) of the Affordable Care Act also requires CMS to promulgate a new QAPI regulation. The new QAPI regulation will include the requirement that all homes must submit to the Secretary a plan for the facility to meet QAPI standards and implement QAPI best practices, including how to coordinate the implementation of a QAPI plan with QAA activities conducted under existing regulations.