

STATE VETERANS HOME PROGRAM

A COMPARISON BETWEEN THE CMS SURVEY & VA SURVEY FOR SKILLED NURSING FACILITIES



This document represents a comparison between the current CMS inspection survey and the VA inspection survey for State Veterans Homes.

1. Pages 2 – 6 represent an overview of the Clinical Standards being reviewed during an inspection survey.

It should be noted that there are over 200 clinical standards reviewed. All standards are addressed by the CMS and VA surveys.

2. Pages 7-8 represent an overview of the Fire & Life Safety Standards being reviewed during an inspection survey.

The CMS & VA inspection survey follow the same standards as outlined in the National Fire Protection Association (NFPA) Life Safety Codes and Standards.

3. Pages 9-16 represent an overview of the Financial Review.

A Fiscal Audit is only conducted during the VA inspection survey. There are no equivalent standards within the CMS inspection survey.

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A Comparison Between The CMS Survey & VA Survey For Skilled Nursing Facilities

**CMS
F-Tag**

**Survey Testing
Performed by CMS**

**Cross Reference of Coverage on VA Survey
(Per Subpart D)**

483.10 Resident Rights		CFR Section 51.70	
F550	Resident Rights/Exercise of Rights	CFR Section 51.70	a
F551	Rights Exercised by Representative	CFR Section 51.70	b(2)
F552	Right to be Informed/Make Treatment Decisions	CFR Section 51.70	b(4)
F553	Right to Participate in Planning Care	CFR Section 51.70	d(2)
F554	Resident Self-Admin Meds-Clinically Appropriate	CFR Section 51.70	d(2); n
F555	Right to Choose/Be Informed of Attending Physician	CFR Section 51.70	d(2); j(1)(iii)
F557	Respect, Dignity/Right to have Personal Property	CFR Section 51.70	c
F558	Reasonable Accommodations of Needs/Preferences	CFR Section 51.70	d
F559	Choose/Be Notified of Room/Roommate Change	CFR Section 51.70	b(9)(D)(ii)(A)
F560	Right to Refuse Certain Transfers	CFR Section 51.70	e(3)(i)
F561	Self Determination	CFR Section 51.70	d
F562	Immediate Access to Resident	CFR Section 51.70	j
F563	Right to Receive/Deny Visitors	CFR Section 51.70	j(1)(v)
F564	Inform of Visitation Rights/Equal Visitation Privileges	CFR Section 51.70	j
F565	Resident/Family Group and Response	CFR Section 51.70	f(1); f(2)
F566	Right to Perform Facility Services or Refuse	CFR Section 51.70	h(1); h(2)
F567	Protection/Management of Personal Funds	CFR Section 51.70	c(1); c(2)
F568	Accounting and Records of Personal Funds	CFR Section 51.70	c(4)
F569	Notice and Conveyance of Personal Funds	CFR Section 51.70	c(3); c(5)
F570	Surety Bond - Security of Personal Funds	CFR Section 51.70	c(6)
F571	Limitations on Charges to Personal Funds	CFR Section 51.70	c
F572	Notice of Rights and Rules	CFR Section 51.70	b
F573	Right to Access/Purchase Copies of Records	CFR Section 51.70	b(2)(i); b(2)(ii)
F574	Required Notices and Contact Information	CFR Section 51.70	b(1)
F575	Required Postings	CFR Section 51.70	b(6)
F576	Right to Forms of Communication with Privacy	CFR Section 51.70	e(1)
F577	Right to Survey Results/Advocate Agency Info	CFR Section 51.70	g(1)
F578	Request/Refuse/Discontinue Treatment; Formulate Advance Directives	CFR Section 51.70	b(4)
F579	Posting/Notice of Medicare/Medicaid on Admission		Not Required by VA. State Veterans' Homes will continue to adhere to this CMS standard.
F580	Notify of Changes (Injury/Decline/Room, Etc.)	CFR Section 51.70	b(9)
F582	Medicaid/Medicare Coverage/Liability Notice		Not Required by VA. State Veterans' Homes will continue to adhere to this CMS standard.
F583	Personal Privacy/Confidentiality of Records	CFR Section 51.70	e(1); e(2)
F584	Safe/Clean/Comfortable/Homelike Environment	Different Section	CFR Section 51.100 i(1)
F585	Grievances	CFR Section 51.70	f(1); f(2)
F586	Resident Contact with External Entities	CFR Section 51.70	k

483.12 Freedom from Abuse Neglect, and Exploitation		CFR Section 51.90	
F600	Free from Abuse and Neglect	CFR Section 51.90	b
F602	Free from Misappropriation/Exploitation	Two Sections	CFR Section 51.90 b; CFR Section 51.700 c(2)
F603	Free from Involuntary Seclusion	CFR Section 51.90	b(5)
F604	Right to be Free from Physical Restraints	CFR Section 51.90	a(1)(ii)
F605	Right to be Free from Chemical Restraints	CFR Section 51.90	a(1)(i)
F606	Not Employ/Engage Staff with Adverse Actions	CFR Section 51.90	c(1)(i)(A)
F607	Develop/Implement Abuse/Neglect, etc. Policies	CFR Section 51.90	b
F608	Reporting of Reasonable Suspicion of a Crime	CFR Section 51.90	c(4)
F609	Reporting of Alleged Violations	CFR Section 51.90	c(3)
F610	Investigate/Prevent/Correct Alleged Violation	CFR Section 51.90	c(3)

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CMS F-Tag	Survey Testing Performed by CMS	Cross Reference of Coverage on VA Survey (Per Subpart D)
483.15 Admission, Transfer, and Discharge		CFR Section 51.80
F620	Admissions Policy	CFR Section 51.80 d
F621	Equal Practices Regardless of Payment Source	CFR Section 51.80 c
F622	Transfer and Discharge Requirements	CFR Section 51.80 b
F623	Notice Requirements Before Transfer/Discharge	CFR Section 51.80 a(2)
F624	Preparation for Safe/Orderly Transfer/Discharge	CFR Section 51.80 b(5)
F625	Notice of Bed Hold Policy Before/Upon Transfer	CFR Section 51.80 b(2); b(3)
F626	Permitting Residents to Return to Facility	CFR Section 51.80 b(3)
483.20 Resident Assessments		CFR Section 51.110
F635	Admission Physician Orders for Immediate Care	CFR Section 51.110 a
F636	Comprehensive Assessments & Timing	CFR Section 51.110 b(2)
F637	Comprehensive Assmt After Significant Change	CFR Section 51.110 b(2)(ii)
F638	Quarterly Assessment At Least Every 3 Months	CFR Section 51.110 b(3)
F639	Maintain 15 Months of Resident Assessments	Different Section CFR Section 51.210 o(1) thru o(5)
F640	Encoding/Transmitting Resident Assessment	CFR Section 51.110 d
F641	Accuracy of Assessments	CFR Section 51.110 c
F642	Coordination/Certification of Assessment	CFR Section 51.110 c(1)(ii)
F644	Coordination of PASARR and Assessments	State Veterans' Homes will continue to adhere to this CMS standard.
F645	PASARR Screening for MD & ID	State Veterans' Homes will continue to adhere to this CMS standard.
F646	MD/ID Significant Change Notification	State Veterans' Homes will continue to adhere to this CMS standard.
483.21 Comprehensive Resident Centered Care Plans		CFR Section 51.110
F655	Baseline Care Plan	CFR Section 51.110 a
F656	Develop/Implement Comprehensive Care Plan	CFR Section 51.110 e
F657	Care Plan Timing and Revision	CFR Section 51.110 e(2)(i)
F658	Services Provided Meet Professional Standards	CFR Section 51.110 e(2)(i)
F659	Qualified Persons	CFR Section 51.110 e(2)(ii)
F660	Discharge Planning Process	CFR Section 51.110 51.80 a
F661	Discharge Summary	CFR Section 51.110 a(6)
483.24 Quality of Life		CFR Section 51.100
F675	Quality of Life	CFR Section 51.100 a
F676	Activities of Daily Living (ADLs)/ Maintain Abilities	CFR Section 51.100 b
F677	ADL Care Provided for Dependent Residents	CFR Section 51.100 b
F678	Cardio-Pulmonary Resuscitation (CPR)	Different Section CFR Section 51.70 b(7)
F679	Activities Meet Interest/Needs of Each Resident	CFR Section 51.100 b(1)
F680	Qualifications of Activity Professional	CFR Section 51.100 g(2)
483.25 Quality of Care		CFR Section 51.120
F684	Quality of Care	CFR Section 51.120
F685	Treatment/Devices to Maintain Hearing/Vision	CFR Section 51.120 c
F686	Treatment/Svcs to Prevent/Heal Pressure Ulcers	CFR Section 51.120 d
F687	Foot Care	CFR Section 51.120 l(7)
F688	Increase/Prevent Decrease in ROM/Mobility	CFR Section 51.120 f
F689	Free of Accident Hazards/Supervision/Devices	CFR Section 51.120 i
F690	Bowel/Bladder Incontinence, Catheter, UTI	CFR Section 51.120 e
F691	Colostomy, Urostomy, or Ileostomy Care	CFR Section 51.120 l(3)

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<u>CMS F-Tag</u>	<u>Survey Testing Performed by CMS</u>	<u>Cross Reference of Coverage on VA Survey (Per Subpart D)</u>	
F692	Nutrition/Hydration Status Maintenance	CFR Section 51.120	j; k
F693	Tube Feeding Management/Restore Eating Skills	CFR Section 51.120	h
F694	Parenteral/IV Fluids	CFR Section 51.120	m
F695	Respiratory/Tracheostomy Care and Suctioning	CFR Section 51.120	l(4); l(5)
F696	Prostheses	CFR Section 51.120	l(8)
F697	Pain Management	CFR Section 51.120	51.11
F698	Dialysis	CFR Section 51.120	e(1)(i)
F699	{PHASE-3} Trauma Informed Care	VA will review as per the State Veterans' Home policy and procedures.	
F700	Bedrails	Different Section	CFR Section 51.90 a
483.30 Physician Services		CFR Section 51.150	
F710	Resident's Care Supervised by a Physician	CFR Section 51.150	a(1)
F711	Physician Visits- Review Care/Notes/Order	CFR Section 51.150	b(1); b(2); b(3)
F712	Physician Visits-Frequency/Timeliness/Alternate NPPs	CFR Section 51.150	c
F713	Physician for Emergency Care, Available 24 Hours	CFR Section 51.150	d
F714	Physician Delegation of Tasks to NPP	CFR Section 51.150	e
F715	Physician Delegation to Dietitian/Therapist	CFR Section 51.150	e(2)
483.35 Nursing Services		CFR Section 51.130	
F725	Sufficient Nursing Staff	CFR Section 51.130	e
F726	Competent Nursing Staff	CFR Section 51.130	e
F727	RN 8 Hrs/7 days/Wk, Full Time DON	CFR Section 51.130	b(1); b(2); b(3)
F728	Facility Hiring and Use of Nurse	CFR Section 51.130	c
F729	Nurse Aide Registry Verification, Retraining	Different Section	CFR Section 51.210 k
F730	Nurse Aide Perform Review – 12Hr/Year In- service	Different Section	CFR Section 51.210 k(6)
F731	Waiver-Licensed Nurses 24Hr/Day and RN Coverage	CFR Section 51.130	b(1); b(2); b(3)
F732	Posted Nurse Staffing Information	CFR Section 51.130	e
483.40 Behavioral Health Services		Different Sections	
F740	Behavioral Health Services	CFR Section 51.100;	CFR Section 51.110 and CFR Section 51.160 a
F741	Sufficient/Competent Staff-Behav Health Needs	CFR Section 51.110	c(ii)(2)
F742	Treatment/Service for Mental/Psychosocial Concerns	CFR Section 51.100	h(1)
F743	No Pattern of Behavioral Difficulties Unless Unavoidable	CFR Section 51.210	p and q
F744	Treatment/Service for Dementia	CFR Section 51.110	e
F745	Provision of Medically Related Social Services	CFR Section 51.100	h(1)
483.45 Pharmacy Services		CFR Section 51.180	
F755	Pharmacy Svcs/Procedures/Pharmacist/Records	CFR Section 51.180	a; b(3)
F756	Drug Regimen Review, Report Irregular, Act On	CFR Section 51.180	c(1); c(2)
F757	Drug Regimen is Free From Unnecessary Drugs	CFR Section 51.180	c(2)
F758	Free from Unnecessary Psychotropic Meds/PRN Use	Different Section	CFR Section 51.120 m(2)(i)
F759	Free of Medication Error Rate of 5% or More	Different Section	CFR Section 51.130 n(1); n(2)
F760	Residents Are Free of Significant Med Errors	Different Section	CFR Section 51.120 n(1); n(2)
F761	Label/Store Drugs & Biologicals	CFR Section 51.180	d
483.50 Laboratory, Radiology, and Other Diagnostic Services		CFR Section 51.210	
F770	Laboratory Services	CFR Section 51.210	m
F771	Blood Blank and Transfusion Services	CFR Section 51.210	m(1)(ii)

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<u>CMS F-Tag</u>	<u>Survey Testing Performed by CMS</u>	<u>Cross Reference of Coverage on (Per Subpart D)</u>	
F774	Assist with Transport Arrangements to Lab Svcs	CFR Section 51.210	m(2)(iii)
F775	Lab Reports in Record-LabName/Address	CFR Section 51.210	m(2)(iv)
F776	Radiology/Other Diagnostic Services	CFR Section 51.210	n
F777	Radiology/Diag. Svcs Ordered/Notify Results	CFR Section 51.210	n(2)(i); n(2)(ii)
F778	Assist with Transport Arrangements to Radiology	CFR Section 51.210	n(2)(iii)
F779	X-Ray/Diagnostic Report in Record-Sign/Dated	CFR Section 51.210	n(2)(iv)
483.55 Dental Services		CFR Section 51.170	
F790	Routine/Emergency Dental Services in SNFs (Medicare)	CFR Section 51.170	a
F791	Routine/Emergency Dental Services in NFs (Medicaid)	CFR Section 51.170	a
483.60 Food and Nutrition Services		CFR Section 51.140	
F800	Provided Diet Meets Needs of Each Resident	CFR Section 51.140	c(1)
F801	Qualified Dietary Staff	CFR Section 51.140	a
F802	Sufficient Dietary Support Personnel	CFR Section 51.140	b
F803	Menus Meet Res Needs/Prep in Advance/Followed	CFR Section 51.140	c(1); c(2); c(3)
F804	Nutritive Value/Appearance, Palatable/Prefer Temp	CFR Section 51.140	d(1); d(2)
F805	Food in Form to Meet Individual Needs	CFR Section 51.140	c(1)
F806	Resident Allergies, Preferences and Substitutes	CFR Section 51.140	d(4)
F807	Drinks Avail to Meet Needs/Preferences/ Hydration	CFR Section 51.140	k
F808	Therapeutic Diet Prescribed by Physician	CFR Section 51.140	e
F809	Frequency of Meals/Snacks at Bedtime	CFR Section 51.140	f(1)
F810	Assistive Devices - Eating Equipment/Utensils	CFR Section 51.140	g
F811	Feeding Assist Training/Supervision/Resident	VA will review as per the State Veterans' Home policy and procedures.	
F812	Food Procurement, Store/Prepare/Serve - Sanitary	CFR Section 51.140	h(1); h(2)
F813	Personal Food Policy	CFR Section 51.140	h(1); h(2)
F814	Dispose Garbage & Refuse Properly	CFR Section 51.140	h(2)
483.65 Specialized Rehabilitative Services		CFR Section 51.160	
F825	Provide/Obtain Specialized Rehab Services	CFR Section 51.160	a
F826	Rehab Services- Physician Order/Qualified Person	CFR Section 51.160	b
483.70 Administration		CFR Section 51.210	
F835	Administration	CFR Section 51.210	a
F836	License/Comply w/Fed/State/Local Law/Prof Std	CFR Section 51.210	a(2)(i)
F837	Governing Body	CFR Section 51.210	a
F838	Facility Assessment	CFR Section 51.210	b
F839	Staff Qualifications	CFR Section 51.210	g
F840	Use of Outside Resources	CFR Section 51.210	h
F841	Responsibilities of Medical Director	CFR Section 51.210	i
F842	Resident Records - Identifiable Information	CFR Section 51.210	o
F843	Transfer Agreement	CFR Section 51.210	o(4)(i); r
F844	Disclosure of Ownership Requirements	CFR Section 51.210	q
F845	Facility Closure-Administrator	Different Section	CFR Section 51.320 Subpart B
F846	Facility Closure	Different Section	CFR Section 51.320 Subpart B
F849	Hospice Services	CFR Section 51.210	h
F850	Qualifications of Social Worker >120 Beds	Different Section	CFR Section 51.100 h(2)
F851	Payroll Based Journal	Equivalent to VA Form No. 10-3567	

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CMS
F-Tag

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(Per Subpart D)

483.75 Quality Assurance and Performance Improvement		CFR Section 51.210	
F865	QAPI Program/Plan, Disclosure/Good Faith Attempt	CFR Section 51.210	p
F866	{PHASE-3} QAPI/QAA Data Collection and Monitoring	CFR Section 51.210	p and q, CFR Section 51.120 a
F867	QAPI/QAA Improvement Activities	CFR Section 51.210	p(2); p(3)
F868	QAA Committee	CFR Section 51.210	p(2)
483.80 Infection Control		CFR Section 51.190	
F880	Infection Prevention & Control	CFR Section 51.190	a; b
F881	Antibiotic Stewardship Program	Different Section	CFR Section 51.150 a(1); a(2); a(3);
F882	{PHASE-3} Infection Preventionist Qualifications/Role	Different Section	CFR Section 51.180 c(1) and c(2)
F883	Influenza and Pneumococcal Immunizations	CFR Section 51.190	a
483.85 {PHASE-3} Compliance and Ethics Program		CFR Section 51.210	b(2); g; i(2)(i); i(3)(v)
F895	{PHASE-3} Compliance and Ethics Program		
483.90 Physical Environment		CFR Section 51.200	
F906	Emergency Electrical Power System	CFR Section 51.200	b
F907	Space and Equipment	CFR Section 51.200	c
F908	Essential Equipment, Safe Operating Condition	CFR Section 51.200	c(1); c(2)
F909	Resident Bed	CFR Section 51.200	d(1)(ii)
F910	Resident Room	CFR Section 51.200	d
F911	Bedroom Number of Residents	CFR Section 51.200	d(1)(i)
F912	Bedrooms Measure at Least 80 Square Ft/Resident	CFR Section 51.200	d(1)(ii)
F913	Bedrooms Have Direct Access to Exit Corridor	CFR Section 51.200	d(vi)
F914	Bedrooms Assure Full Visual Privacy	CFR Section 51.200	d(vii)
F915	Resident Room Window	CFR Section 51.200	d(ix)
F916	Resident Room Floor Above Grade	CFR Section 51.200	d(1)(x)
F917	Resident Room Bed/Furniture/Closet	CFR Section 51.200	d(2)(iv)
F918	Bedrooms Equipped/Near Lavatory/Toilet	CFR Section 51.200	e
F919	Resident Call System	CFR Section 51.200	f
F920	Requirements for Dining and Activity Rooms	CFR Section 51.200	g
F921	Safe/Functional/Sanitary/ Comfortable Environment	CFR Section 51.200	h
F922	Procedures to Ensure Water Availability	CFR Section 51.200	h(1)
F923	Ventilation	CFR Section 51.200	h(2)
F924	Corridors Have Firmly Secured Handrails	CFR Section 51.200	h(3)
F925	Maintains Effective Pest Control Program	CFR Section 51.200	h(4)
F926	Smoking Policies	CFR Section 51.200	i(2)
483.95 Training Requirements		Different Sections	
F940	{PHASE-3} Training Requirements - General	CFR Section 51.210	k(6)(iii)
F941	{PHASE-3} Communication Training	CFR Section 51.130	
F942	{PHASE-3} Resident's Rights Training	CFR Section 51.700	
F943	Abuse, Neglect, and Exploitation Training	CFR Section 51.190	
F945	{PHASE-3} Infection Control Training	CFR Section 51.190	
F947	Required In-Service Training for Nurse Aides	CFR Section 51.130	a; CFR Section 51.210 k
F948	Training for Feeding Assistants	CFR Section 51.210	k(6)(iii)
F949	{PHASE-3} Behavioral Health Training	CFR Section 51.210	k(6)(iii)

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Fire and Life Safety Standards

Note: The CMS Survey and VA Survey follow the same standards as outlined in the NFPA Life Safety Code.

<u>CMS K-Tag</u>	<u>Description of Standard</u>	<u>VA Survey Standards</u>
K100	General Requirements – Other	NFPA 101 General Requirements – Other List in the REMARKS section, any LSC Section 18.1 and 19.1 General Requirements that are not addressed by the provided K- tags, but are deficient. This information, along with the applicable Life Safety Code or NFPA standard citation, should be included on Form CMS-2567.
K111	Building Rehabilitation	NFPA 101, Chapter 43.3.6; 43.4; 43.5; 43.6; 18.1.1; 19.1.1; 43.1.2; 4.6; 43.1; 43.7; 18.1; 8.3; 4.6.7; 4.6.11; 8.3; 43.8
K161	Building Construction Type and Height	NFPA 101, Chapter 19.1.6
K200	Means of Egress Requirements – Other	NFPA 101, Chapter 18.2; 19.2
K211	Means of Egress – General	NFPA 101, Chapter 18.2.1; 19.2.1; 7.1.10
K222	Egress Doors	NFPA 101, Chapter 18.2.2; 19.2.2
K225	Stairways and Smoke proof Enclosures	NFPA 101, Chapter 7.2; 18.2.2; 19.2.2
K226	Horizontal Exits	NFPA 101, Chapter 7.2.4; 18.2.2; 19.2.2
K227	Ramps and Other Exits	NFPA 101, Chapter 7.2.5; 18.2.2; 19.2.2
K231	Means of Egress Capacity	NFPA 101, Chapter 7.3; 18.2.3; 19.2.3
K232	Aisle, Corridor or Ramp Width	NFPA 101, Chapter 18.2.3
K241	Number of Exits – Story and Compartment	NFPA 101, Chapter 18.2.4; 19.2.4
K251	Dead-End Corridors and Common Path of Travel	NFPA 101, Chapter 19.2.5
K261	Travel Distance To Exits	NFPA 101, Chapter 7.5.3; 33.3.2
K271	Discharge from Exits	NFPA 101, Chapter 18.2.7; 19.2.7
K281	Illumination of Means of Egress	NFPA 101, Chapter 18.2.8; 19.2.8
K291	Emergency Lighting	NFPA 101, Chapter 18.2.9; 19.2.9
K292	Life Support Means of Egress	NFPA 101, Chapter 18.2.5.9; 18.2.10
K293	Exit Signage	NFPA 101, Chapter 18.2.10
K300	Protection – Other	NFPA 101, Chapter 18.3; 19.3
K311	Vertical Openings – Enclosure	NFPA 101, Chapter 8.6; 19.3.1
K321	Hazardous Areas – Enclosure	NFPA 101, Chapter 8.4; 19.3.2; 18.3.2; 7.2.1; 9.7 18.3.
K331	Interior Wall and Ceiling Finish	NFPA 101, Chapter 10.2; 19.3.3; 18.3.3
K332	Interior Floor Finish	NFPA 101, Chapter 18.3.3; 10.2; 10.2.7
K341	Fire Alarm System – Installation	NFPA 70 & 101, Chapter 18.3.4; 19.3.4; 9.6; 9.6.1
K342	Fire Alarm System – Initiation	NFPA 101, Chapter 18.3.4; 19.3.4; 9.6.2
K343	Fire Alarm – Notification	NFPA 101, Chapter 9.6.3; 19.3.4; 9.6.4; 9.7.1
K345	Fire Alarm System – Testing and Maintenance	NFPA 70, 72 & 101, Chapter 9.7.5; 9.7.7; 9.7.8
K346	Fire Alarm – Out of Service	NFPA 101, Chapter 9.6.1
K347	Smoke Detection	NFPA 101, Chapter 19.3.6; 19.3.4; 18.3.4
K351	Sprinkler System – Installation	NFPA 13 & 101, Chapter 19.3.5; 19.4.2; 19.3.5; 9.3; 9.7.1
K352	Sprinkler System – Supervisory Signals	NFPA 72 & 101, Chapter 9.7.2
K353	Sprinkler System – Maintenance and Testing	NFPA 25 & 101, Chapter 9.7.5; 9.7.7; 9.7.8
K354	Sprinkler System – Out of Service	NFPA 25 & 101, Chapter 18.3.5; 19.3.5; 9.7.5; 15.5.2
K355	Portable Fire Extinguishers	NFPA 10 & 101, Chapter 18.3.5; 19.3.5
K362	Corridors – Construction of Walls	NFPA 101, Chapter 19.3.6
K363	Corridor – Doors	NFPA 101, Chapter 19.3.6
K364	Corridor – Openings	NFPA 101, Chapter 18.3.6; 19.3.6; 8.3
K371	Subdivision of Building Spaces – Smoke Compartments	NFPA 101, Chapter 19.3.7; 18.3.7
K372	Subdivision of Building Spaces – Smoke Barrier Construction	NFPA 101, Chapter 19.3.7; 8.6.7; 18.3.7; 8.3
K374	Subdivision of Building Spaces – Smoke Barrier Doors	NFPA 101, Chapter 18.3.7
K421	High-Rise Buildings	NFPA 101, Chapter 19.4.2

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<u>CMS K-Tag</u>	<u>Description of Standard</u>	<u>VA Survey Standards</u>
K511	Utilities -- Gas and Electric	NFPA 101, Chapter 18.5.1; 19.5.1; 9.1.1; 9.1.2
K521	HVAC	NFPA 101, Chapter 18.5.2; 19.5.2; 9.2
K522	HVAC -- Any Heating Device	NFPA 101, Chapter 18.5.2; 19.5.2
K531	Elevators	NFPA 101, Chapter 19.5.3; 9.4.2; 9.4.3
K532	Escalators, Dumbwaiters, and Moving Walks	NFPA 101, Chapter 9.4; 18.5.3; 9.4.2
K541	Rubbish Chutes, Incinerators, and Laundry Chutes	NFPA 82 & 101, Chapter 8.7; 18.5.4; 8.7; 9.5; 9.7
K700	Operating Features -- Other	Operating Features -- Other List in the REMARKS section any LSC Section 18.7 and 19.7 Operating Features requirements that are not addressed by the provided K-tags, but are deficient. This information, along with the applicable Life Safety Code or NFPA standard citation, should be included in Form CMS-2567
K711	Evacuation and Relocation Plan	NFPA 101, Chapter 18.7.1; 18.7.2; 19.7.1; 19.7.2; 19.7
K712	Fire Drills	NFPA 101, Chapter 18.7.1; 19.7.1
K741	Smoking Regulations	NFPA 101, Chapter 32.7.4
K751	Draperies, Curtains, and Loosely Hanging Fabrics	NFPA 101, Chapter 18.7.4; 19.7.4
K752	Upholstered Furniture and Mattresses	NFPA 101, Chapter 10.3.2; 10.3.3; 10.3.4; 18.7.5; 19.7
K761	Maintenance, Inspection & Testing - Doors	NFPA 80, 101 & 105 5.2.5; 33.7.7; 5.2.1
K762	Staff	NFPA 101, Chapter 33.2.6; 33.7.6
K771	Engineer Smoke Control Systems	NFPA 92 & 101, Chapter 18.7.7
K781	Portable Space Heaters	NFPA 101, Chapter 18.7.8; 19.7.8
K791	Construction, Repair, and Improvement Operations	NFPA 241 & 101, Chapter 18.7.9; 19.7.9; 4.6.10; 7.1.10

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Financial Review

Financial Review is conducted by the VA Team. There are no equivalent standards within the CMS Survey.

Survey Testing Performed by CMS	VA Line Item #	Subpart F – Requirements Applicable to Eligibility, Rates and Payment	Standard for VA Survey Per Subpart F
Not Reviewed By CMS		Basic per diem rates	\$51.40
	1000	Basic Rate	(a)
	1001	How to calculate daily cost	(b)
	1002	Determining whether a veteran spent a day receiving NH, DOM or ADHC care	(c) (d)
Not Reviewed By CMS		Contract or VA Provider Agreement Required	\$51.41
	1003	Contract or VA provider agreement required	51.41 (a)
	1004	Payments under contract	51.41 (b)
	1005	Payments under VA provider agreements	51.41 (c)
	1006	VA signing official, forms, Termination of VA provider agreements, compliance with federal laws	51.41 (d) - (g)
Not Reviewed By CMS		Payment Procedures	\$51.42
	1007	Forms required	51.42 (a) (1)
	1008	Forms required for monthly payments	51.42 (a) (2)
	1009	Commencement of Payments	51.42 (b) (1)
	1010	Per diem payments	51.42 (b) (2)
	1011	Payments for eligible veterans	51.42 (b) (3)
Not Reviewed By CMS		Drugs and Medicines	\$51.43
	1012	Drugs and medicines for certain veterans	51.43 (a)
	1013	Drugs and medicines for certain veterans	51.43 (b)
	1014	Drugs and medicines for certain veterans	51.43 (c)
	1015	Drugs and medicines for certain veterans	51.43 (d)
	1016	Drugs and medicines for certain veterans	51.43 (e)
Not Reviewed By CMS		Eligible veteran -nursing home care	\$51.50
	1017	Eligible veterans – nursing home care	51.50 (a) – (i)
Not Reviewed By CMS		Authority to continue payment of per diem when veterans are relocated due to emergency	\$51.59
	1018	Definition of emergency	51.59 (a)
	1019	General authority to pay per diem during a relocation period	51.59 (b)
	1020	Selection of evacuation facilities	51.59 (c) (1)
	1021	Type of approved evacuation facilities	51.59 (c) (2)
	1022	Approval of process	51.59 (e)
Not Reviewed By CMS		Resident Rights	\$51.70
	1028	Resident Rights	51.70 (a) (1) – (5)
	1029	Resident Rights	51.70 (b) (1) – (2)
	1030	Resident Rights	51.70 (b) (3) – (6)
	1031	Resident Rights	51.70 (b) (7) – (8)
	1032	Resident Rights	51.70 (b) 9 – (i)
	1033	Resident Rights	51.70 (b) 9 (ii)– (iii)
	1034	Protection of Funds	51.70 (c) (1) – (2)
	1035	Deposit of funds	51.70 (c) (3)
	1036	Accounting and records	51.70 (c) (4)
	1037	Conveyance upon death	51.70 (c) (5)
	1038	Assurance of financial security	51.70 (c) (6)
	1039	Free Choice	51.70 (d) (1) – (2)
	1040	Privacy and confidentiality	51.70 (e) (1) – (3)
	1041	Grievances	51.70 (f) (1) – (2)
	1042	Examination of survey results	51.70 (g) (1) – (2)
Survey Testing Performed	VA Line		Standard for VA Survey

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A Comparison Between The CMS Survey & VA Survey For Skilled Nursing Facilities

<u>by CMS</u>	<u>Item #</u>	<u>Subpart F – Requirements Applicable to Eligibility, Rates and Payment</u>	<u>Per Subpart F</u>
	1043	Work	51.70 (h) (1) – (2)
	1044	Mail	51.70 (i)
	1045	Access and visitation rights	51.70 (j) (1) – (2)
	1046	Access and visitation rights	51.70 (j) (3)
	1047	Telephone	51.70 (k)
	1048	Personal Property	51.70 (l)
	1049	Married Couples	51.70 (m)
	1050	Self-administration of drugs	51.70 (n)
Not Reviewed By CMS		Transfer and discharge	\$51.80
	1056	Transfer and discharge	51.80 (a) (1) – (2)
	1057	Documentation	51.80 (a) (3)
	1058	Notice before transfer	51.80 (a) (4)
	1059	Timing of notice	51.80 (a) (5)
	1060	Contents of the notice	51.80 (a) (6)
	1061	Orientation for transfer or discharge	51.80 (a) (7)
	1062	Notice of bed-hold policy and readmission	51.80 (b) (1)
	1063	Bed-hold notice upon transfer	51.80 (b) (2)
	1064	Notice of bed-hold and policy and readmission	51.80 (b) (3)
	1065	Equal access to quality care	51.80 (c)
	1066	Admissions policy	51.80 (d)
Not Reviewed By CMS		Restraints	\$51.90
	1072	Restraints	51.90 (a) (1) – (4)
	1073	Abuse	51.90 (b) (1) – (5)
	1074	Staff treatment of residents	51.90 (c) (1)
	1075	Staff treatment of residents	51.90 (c) (2)
	1076	Staff treatment of residents	51.90 (c) (3)
	1077	Staff treatment of residents	51.90 (c) (4)
Not Reviewed By CMS		Quality of Life	\$51.100
	1083	Quality of Life	51.100 (a) (b)
	1084	Resident Council	51.100 (c)
	1085	Participation in resident and family groups	51.100 (d)
	1086	Participation in other activities	51.100 (e)
	1087	Accommodation of needs	51.100 (f)
	1088	Patient Activities	51.100 (g) (1)
	1089	Activities Program Staff	51.100 (g) (2)
	1090	Social Services	51.100 (h) (1)
	1091	Social Services Staff	51.100 (h) (2)
	1092	Qualification of Social Worker	51.100 (h) (3)
	1093	Support Staff	51.100 (h) (4)
	1094	Facilities for interviews	51.100 (h) (5)
	1095	Environment	51.100 (i) (1)
	1096	Housekeeping	51.100 (i) (2)
	1097	Clean bed and bath linens	51.100 (i) (3)
	1098	Private closet space	51.100 (i) (4)
	1099	Lighting	51.100 (i) (5)
	1100	Temperatures	51.100 (i) (6)
	1101	Sound	51.100 (i) (7)
Not Reviewed By CMS		Resident Assessment	\$51.110
	1107	Resident Assessment	51.110 (a)
	1108	Comprehensive assessments	51.110 (b) (1)
	1109	Frequency of assessments	51.110 (b) (2)
	1110	Review of assessments	51.110 (b) (3)
	1111	Use	51.110 (b) (4)
	1112	Accuracy of assessments	51.110 (c)
	1113	Submission of assessments	51.110 (d)
	1114	Comprehensive care plans	51.110 (e) (1)
	1115	Comprehensive care plan must:	51.110 (e) (2)
	1116	Services provided or arranged	51.110 (e) (3)
	1117	Discharge summary	51.110 (f)
Survey Testing Performed	VA Line		Standard for VA Survey

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<u>by CMS</u>	<u>Item #</u>	<u>Subpart F – Requirements Applicable to Eligibility, Rates and Payment</u>	<u>Per Subpart F</u>
Not Reviewed By CMS		Quality of Care	\$51.120
	1123	Quality of Care	51.120 (a) (1) – (2)
	1124	Sentinel Events	51.120 (a) (3)
	1125	Sentinel Events	51.120 (a) (4)
	1126	Activities of daily living	51.120 (b) (1)
	1127	Treatment provided	51.120 (b) (2)
	1128	Necessary Services	51.120 (b) (3)
	1129	Visio ad Hearing	51.120 (c)
	1130	Pressure sores	51.120 (d)
	1131	Urinary and fecal incontinence	51.120 (e) (1) – (2)
	1132	Fecal incontinence	51.120 (e) (3)
	1133	Range of motion	51.120 (f)
	1134	Mental and psychosocial functioning	51.120 (g)
	1135	Enteral feedings	51.120 (h)
	1136	Accidents	51.120 (i)
	1137	Nutrition	51.120 (j)
	1138	Hydration	51.120 (k)
	1139	Special needs	51.120 (l)
	1140	Unnecessary drugs	51.120 (m) (1)
	1141	Antipsychotic drugs	51.120 (m) (2)
	1142	Medication errors	51.120 (n)
Not Reviewed By CMS		Nursing Services	\$51.130
	1148	Nursing services	51.130 (a)
	1149	24/7 nursing	51.130 (b)
	1150	Director of Nursing Services	51.130 (c)
	1151	2.5 hours per week	51.130 (d)
	1152	Staffing methodology	51.130 (e)
Not Reviewed By CMS		Dietary Services	\$51.140
	1155	Dietary Services	51.140 (a)
	1156	Sufficient staff	51.140 (b)
	1157	Menus and nutritional adequacy	51.140 (c)
	1158	Food	51.140 (d)
	1159	Therapeutic diets	51.140 (e)
	1160	Frequency of meals	51.140 (f)
	1161	Assistive devices	51.140 (g)
	1162	Sanitary conditions	51.140 (h)
Not Reviewed By CMS		Physician Services	\$51.150
	1168	Physician Services	51.150 (a)
	1169	Physician visits	51.150 (b)
	1170	Frequency of physician visits	51.150 (c)
	1171	Availability of physicians	51.150 (d)
	1172	Physician delegation of tasks	51.150 (e) (1)
	1173	Primary care physician	51.150 (e) (2)
Not Reviewed By CMS		Specialized rehabilitation services	\$51.160
	1176	Specialized rehabilitation services	51.160 (a)
	1177	Order by a physician	51.160 (b)
Not Reviewed By CMS		Dental Services	\$51.170
	1180	Dental Services	51.17
Not Reviewed By CMS		Pharmacy Services	\$51.180
	1183	Pharmacy Services	51.180 (a)
	1184	Service Consultation	51.180 (b)
	1185	Drug regimen review	51.180 (c)
	1186	Labeling of drugs and biologicals	51.180 (d)
	1187	Storage of drugs and biologicals	51.180 (e) (1)
	1188	Controlled drugs	51.180 (e) (2)
Survey Testing Performed	VA Line		Standard for VA Survey

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<u>by CMS</u>	<u>Item #</u>	<u>Subpart F – Requirements Applicable to Eligibility, Rates and Payment</u>	<u>Per Subpart F</u>
Not Reviewed By CMS		Infection Control	\$51.190
	1194	Infection Control	51.190 (a)
	1195	Preventing spread of infection	51.190 (b)
	1196	Linens	51.190 (c)
Not Reviewed By CMS		Physical Environment	\$51.200
	1199	Physical Environment	51.200 (a)
	1200	Emergency Power	51.200 (b)
	1201	Space and equipment	51.200 (c)
	1202	Resident rooms	51.200 (d) (1)
	1203	Rooms	51.200 (d) (2)
	1204	Toilet facilities	51.200 (e)
	1205	Resident call system	51.200 (f)
	1206	Dining and resident activities	51.200 (g)
	1207	Other environment conditions	51.200 (h) (1)
	1208	Ventilation	51.200 (h) (2)
	1209	Handrails	51.200 (h) (3)
	1210	Pest Control	51.200 (h) (4)
Not Reviewed By CMS		Administration	\$51.210
	1216	Governing Body	51.210 (a)
	1217	Disclosure of State agency and individual responsible for oversight of facility	51.210 (b)
	1218	Required information:	51.210 (c) (1) – (6)
	1219	Annual State Fire Marshall's Report:	51.210 (c) (7) – (11)
		Annual certification 10-0143A	51.210 (c) (8)
		Annual certification 10-0143	51.210 (c) (9)
		Annual certification 10-0144	51.210 (c) (10)
		Annual certification 10-0144A	51.210 (c) (11)
	1220	Percentage of veterans	51.210 (d)
	1221	Management of contract facility	51.210 (e)
	1222	Licensure	51.210 (f)
	1223	Staff qualifications	51.210 (g)
	1224	Use of outside resources	51.210 (h)
	1225	Medical Director	51.210 (i)
	1226	Credentialing & privileging	51.210 (j)
	1227	Required training of nurse aides	51.210 (k) (1) – (2)
	1228	Registry verification - Multi-State registry verification	51.210 (k) (3) – (4)
	1229	Required retraining - Regular in-service education	51.210 (k) (5) – (6)
	1230	Proficiency of Nurse Aides	51.210 (l)
	1231	Level B Laboratory services	51.210 (m) (1)
	1232	Provide or obtain laboratory services	51.210 (m) (2)
	1233	Radiology and other Diagnostic services	51.210 (n) (1)
	1234	Provide or obtain radiology and other diagnostic services	51.210 (n) (2)
	1235	Clinical records	51.210 (o) (1)
	1236	Clinical records must be retained for:	51.210 (o) (2)
	1237	Safeguard clinical information	51.210 (o) (3)
	1238	Information kept confidential	51.210 (o) (4)
	1239	Clinical record	51.210 (o) (5)
	1240	Quality Assessment and Assurance	51.210 (p) (1)
	1241	Quality Assessment and Assurance Committee	51.210 (p) (2)
	1242	Deficiencies corrected	51.210 (p) (3)
	1243	Disaster and emergency preparedness	51.210 (q) (1)
	1244	Train staff on emergency procedures	51.210 (q) (2)
	1245	Transfer agreement	51.210 (r)
	1246	Compliance with Federal, State and local laws	51.210 (s)
	1247	Relationship to other federal regulations	51.210 (t)
	1248	Intermingling	51.210 (u)

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A Comparison Between The CMS Survey & VA Survey For Skilled Nursing Facilities

<u>by CMS</u>	<u>Item #</u>	<u>Adult Day Care</u>	<u>Per Subpart F</u>
Not Reviewed By CMS	Basic per diem rates		\$51.40
	3000	Basic Rate	51.40 (a)
	3001	How to calculate daily cost	51.40 (b)
	3002	Basic per diem rates	51.40 (d)
Not Reviewed By CMS	Payment Procedures		\$51.42
	3007	Forms required	51.42 (a) (1)
	3008	Forms required for monthly payments	51.42 (a) (2)
	3009	Commencement of Payments	51.42 (b) (1)
	3010	Per diem payments	51.42 (b) (2)
	3011	Payments for eligible veterans	51.42 (b) (3)
Not Reviewed By CMS	Drugs and Medicines		\$51.43
	3012	Drugs and medicines for certain veterans	51.43 (b)
	3013	Drugs and medicines for certain veterans	51.43 (c)
	3014	Drugs and medicines for certain veterans	51.43 (d)
	3015	Drugs and medicines for certain veterans	51.43 (e)
Not Reviewed By CMS	Eligible veteran – ADHC care		\$51.52
	3016	Eligible veterans – ADHC home care	51.52 (a) – (d)
Not Reviewed By CMS	Authority to continue payment of per diem when veterans are relocated due to emergency		\$51.59
	3017	Definition of emergency	51.59 (a)
	3018	General authority to pay per diem during a relocation period	51.59 (b)
	3019	Selection of evacuation facilities	51.59 (c)
	3020	Type of approved evacuation facilities	51.59 (d)
	3021	Approval of response	51.59 (e)
Not Reviewed By CMS	Resident Rights		\$51.70
	3027	Resident Rights	51.70 (a) (1) – (5)
	3028	Resident Rights	51.70 (b) (1) – (2)
	3029	Resident Rights	51.70 (b) (3) – (6)
	3030	Resident Rights	51.70 (b) (7) – (8)
	3031	Notification of changes	51.70 (b) (9) (i)
	3032	Resident Rights	51.70 (b) (9) (ii) – (iii)
	3033	Protection of Funds	51.70 (c) (1) – (2)
	3034	Deposit of funds	51.70 (c) (3)
	3035	Accounting and records	51.70 (c) (4)
	3036	Conveyance upon death	51.70 (c) (5)
	3037	Assurance of financial security	51.70 (c) (6)
	3038	Free Choice	51.70 (d)
	3039	Privacy and confidentiality	51.70 (e)
	3040	Grievances	51.70 (f)
	3041	Examination of survey results	51.70 (g)
	3042	Work	51.70 (h)
	3043	Mail	51.70 (i)
	3044	Access and visitation rights	51.70 (j) (1) – (2)
	3045	Access and visitation rights	51.70 (j) (3)
	3046	Telephone	51.70 (k)
	3047	Personal Property	51.70 (l)
	3048	Self-administration of drugs	51.70 (n)
	3049	Participant and family caregiver responsibilities	\$51.405
Not Reviewed By CMS	Transfer and Discharge		\$51.410
	3055	Definition	51.410 (a) – (b)
	3056	Notice before transfer or discharge	51.410 (c)
	3057	Timing of the notice	51.410 (d)
	3058	Contents of notice	51.410 (e)
	3059	Orientation for transfer or discharge	51.410 (f)
	3060	Written policy	51.410 (g)
Survey Testing Performed <u>by CMS</u>	VA Line <u>Item #</u>	Subpart F – Standards Applicable to the Payment of Per Diem for <u>Adult Day Care</u>	Standard for VA Survey <u>Per Subpart F</u>

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Not Reviewed By CMS		Program Practices	\$51.411
	3066	Equal access to quality care	51.411 (a) – (c)
Not Reviewed By CMS		Participant behavior and facility practices	\$51.90
	3068	Restraints	51.90 (a)
	3069	Abuse	51.90 (b)
	3070	Staff treatment of residents	51.90 (c) (1)
	3071	Staff treatment of residents	51.90 (c) (2)
	3072	Staff treatment of residents	51.90 (c) (3)
	3073	Staff treatment of residents	51.90 (c) (4)
Not Reviewed By CMS		Quality of Life	\$51.420
	3079	Environment	51.420 (a) – (b)
	3080	Participant and family concerns	51.420 (c)
	3081	Participation in other activities	51.420 (d)
	3082	Therapeutic participate activities	51.420 (e) (1) – (2)
	3083	Participant involvement	51.420 (e) (3)
	3084	Social Services	51.420 (f) (1) – (3)
	3085	Social Workers	51.420 (f) (4)
	3086	Space for Social Services	51.420 (f) (5)
	3087	Environment	51.420 (g)
Not Reviewed By CMS		Physician orders and participant medical assessment	\$51.425
	3093	Resident Assessment	51.425 (a)
	3094	Comprehensive Assessments	51.425 (b)
	3095	Coordination of assessments	51.425 (c)
	3096	Comprehensive care plans	51.425 (d) (1)
	3097	Services provided or arranged	51.425 (d) (2)
	3098	Discharge summary	51.425 (e)
Not Reviewed By CMS		Quality of Care	\$51.120
	3104	Sentinel Events	51.120 (a) (1)
	3105	Sentinel Events	51.430 (a)
	3106	Reporting of Sentinel Events	51.120 (a) (3)
	3107	Duty to report Sentinel Events	51.430 (2)
	3108	Mechanism to analyze sentinel events	51.430 (3)
	3109	Activities of daily living	51.430 (b) (1)
	3110	Appropriate treatment and services given	51.430 (b) (2)
	3111	Necessary services	51.430 (b) (3)
	3112	Mental and psychosocial functioning	51.430 (c)
	3113	Medication errors	51.120 (n)
	3114	Medication errors	51.430 (d)
Not Reviewed By CMS		Nursing Services	\$51.435
	3120	Nursing Services	51.435 (a)
	3121	Nurse staffing	51.435 (b)
	3122	Nurse staffing	51.435 (c)
Not Reviewed By CMS		Dietary Services	\$51.140
	3128	Dietary Services	51.140 (a)
	3129	Sufficient Staff	51.140 (b)
	3130	Menus and nutritional adequacy	51.140 (c)
	3131	Food	51.140 (d)
	3132	Therapeutic diets	51.140 (e)
	3133	Dietary Services	51.140 (a) – (b)
	3134	Assistive devices	51.140 (g)
	3135	Sanitary conditions	51.140 (h)
Not Reviewed By CMS		Physician Services	\$51.445
	3141	Physician services	51.445 (a)
	3142	Frequency of physician reviews	51.445 (b)
	3143	Availability of acute care	51.445 (c)
	3144	Availability of physicians for emergency care	51.445 (d)
	3145	Physician delegation of tasks	51.445 (e) (1)
	3146	Delegation of tasks	51.445 (e) (2)
Survey Testing Performed by CMS	VA Line Item #	Subpart F – Standards Applicable to the Payment of Per Diem for Adult Day Care	Standard for VA Survey Per Subpart F

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Not Reviewed By CMS	Specialized Rehabilitative Services		\$51.450
	3152	Provision of services	51.450 (a)
	3153	Written order	51.450 (b)
Not Reviewed By CMS	Dental Services		\$51.455
	3156	Dental Services	51.455
Not Reviewed By CMS	Administration of Drugs		\$51.460
	3159	If medical model – assist participants in mgt of medications	51.46
	3160	Procedures	51.460 (a)
	3161	Service Consultation	51.460 (b)
Not Reviewed By CMS	Infection Control		\$51.190
	3167	Infection Control	51.190 (a)
	3168	Preventing spread of infection	51.190 (b)
	3169	Linens	51.190 (c)
Not Reviewed By CMS	Physical Environment		\$51.200
	3172	Physical environment	51.200 (a)
	3173	Physical environment	51.470 (a)
	3174	Space and equipment	51.470 (b) (1)
	3175	Space	51.470 (b) (2) (3)
	3176	Design and partition its space	51.470 (b) (4)
	3177	Furnishings	51.470 (c)
	3178	Participant call system	51.470 (d)
	3179	Other environmental conditions	51.470 (e)
Not Reviewed By CMS	Administration		\$51.210
	3185	Governing Body	51.210 (a)
	3186	Disclosure of State agency and individual responsible for oversight of facility	51.210 (b)
	3187	Administration	51.210 (c) (1) – (6)
	3188	Required Information:	51.210 (c) (7) – (11)
		Annual State Fire Marshall's Report	51.210 (c) (7)
		Annual certification 10-0143A	51.210 (c) (8)
		Annual certification 10-0143	51.210 (c) (9)
		Annual certification 10-0144	51.210 (c) (10)
		Annual certification 10-0144A	51.210 (c) (11)
	3189	Percentage of Veterans	51.210 (d)
	3190	Management of Contract Facility	51.210 (e)
	3191	Licensure	51.210 (f)
	3192	Staff qualifications	51.210 (g)
	3193	Use of outside resources	51.210 (h)
	3194	Medical Director	51.210 (i)
	3195	Medical Director	51.475 (a)
	3196	Credentialing & privileging	51.210 (j)
	3197	Required training of nurse aides	51.210 (k) (1) – (2)
	3198	Registry Verification	51.210 (k) (3) – (4)
	3199	Required Training	51.210 (k) (5) – (6)
	3200	Proficiency of Nurse Aides	51.210 (l)
	3201	Level B Requirement Laboratory services	51.210 (m) (1)
	3202	Provide or obtain laboratory services	51.210 (m) (2)
	3203	Laboratory Services, radiology, and other diagnostic services	51.475 (b)
	3204	Radiology and other Diagnostic services	51.210 (n) (1)
	3205	Provide or obtain radiology and other diagnostic services	51.210 (n) (2)
	3206	Laboratory services, radiology, and other diagnostic services	51.475 (b)
	3207	Clinical Records	51.210 (o) (1)
	3208	Clinical records must be retained for:	51.210 (o) (2)
	3209	Safeguard clinical information	51.210 (o) (3)
	3210	Information kept confidential	51.210 (o) (4)
	3211	Clinical Record must contain	51.210 (o) (5)
	3212	Disaster and emergency preparedness	51.210 (q) (1)
	3213	Train staff on emergency procedures	51.210 (q) (2)
	3214	Transfer Agreement	51.210 (r)
	3215	Compliance with Federal, State and local laws	51.210 (s)
	3216	Relationship to other federal regulations	51.210 (t)
	3217	Intermingling	51.210 (u)

Survey Testing Performed
by CMS

VA Line
Item #

Subpart F – Standards Applicable to the Payment of Per Diem for
Adult Day Care

Standard for VA Survey
Per Subpart F

STATE VETERANS HOME PROGRAM
A Comparison Between The CMS Survey & VA Survey For Skilled Nursing Facilities

Not Reviewed By CMS

Transportation		\$51.480
3218	Transportation	51.480 (a)
3219	Transportation Policy	51.480 (b)
3220	Drivers access to two-way communication	51.480 (c)
3221	Applicable local, State and Federal regulations on systems and vehicles	51.480 (d)
3222	Care needs of each participant	51.480 (e)

STATE VETERANS HOME PROGRAM

Comparison of the CMS Survey Versus VA Survey

For Skilled Nursing Facilities

Final Notations:

- The VA Survey is the preferred survey because it is more comprehensive of the needs of the veteran population.
- State Veterans Homes provide skilled nursing care, domiciliary care and adult day health care. The VA reviews all 3 programs. CMS limits their review specifically to skilled nursing facilities.
- The VA Survey has a fiscal component as part of their review. CMS does not perform a fiscal review.

If you have further questions, please reach out to:

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***FSS/WJH NASVH
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