

## Advisory Notice Notice No: 2022-HC01

## **DNV Healthcare USA Inc.**

Advisory Notices are designed to provide official information relative to Hospital Accreditation and Certification activities. Should you have any questions about the content of this notice, please e-mail <a href="mailto:dnvclientdropbox@dnv.com">dnvclientdropbox@dnv.com</a>.

Date: January 7, 2022

Subject: DNV survey scheduling during COVID surge, and surveyor vaccination policy

Distribution: All DNV Accredited or Certified Hospitals, Applicant Hospitals, DNV Employees, and Interested

**Parties** 

Approved By: Troy D McCann, Director of Accreditation

On August 18, 2021, DNV announced the continuation of remote NIAHO® annual surveys through the end of calendar 2021. Since that announcement, COVID-19 positivity rates, hospitalizations, and community transmission have continued to vary, never dropping to levels that would safely permit a complete return to onsite surveys. Recent trends in the national data from CMS and CDC continue to bring uncertainty to scheduling of onsite accreditation surveys.

As COVID-19 risks continue to rise sharply, driven by the highly transmissible Omicron variant, **DNV will continue to conduct NIAHO Annual (periodic) surveys remotely through at least February 2022.** This includes condition-level follow-up surveys resulting from these annual surveys and any survey related to non-deemed accreditation. More information on the NIAHO remote survey process is available in our <u>on-demand webinar</u> and on our Healthcare <u>COVID-19</u> <u>Resources</u> page.

CMS guidance for accreditation organizations still requires deemed accreditation surveys to be performed onsite, so all **NIAHO full accreditation and re-accreditation surveys will continue to be conducted onsite and unannounced until further notice.** This includes NIAHO surveys for new applicant hospitals (Medicare 855), initial DNV deemed accreditation surveys (AO conversion, first-time accreditation, new subprovider certifications), investigation of substantial allegations, and any condition-level follow-up surveys or special survey activities related to onsite accreditation surveys.

DNV acknowledges the increased burdens on healthcare providers brought on by the latest surge and we have recently discussed ways of reducing this burden with CMS. Rather than issue new national guidance on re-prioritization of surveys, CMS will rely on the discretion of accreditation organizations to determine whether postponement of an onsite survey is safe and appropriate under the individual facility's circumstances. **DNV-accredited hospitals that expect onsite accreditation or re-accreditation survey in the 1**st quarter of 2022 (generally, with accreditation expiration dates before 5/31/2022) may request postponement of survey if they are experiencing the following due to COVID-19:

- Inpatient census at or near capacity, or extraordinary ICU utilization
- Inpatient, emergency, or critical care capacity reduced due to COVID-19 related staff shortage
- Shortage of PPE, medical supplies, medications, or vaccines
- Voluntary or mandated discontinuation of elective surgeries
- Emergency department closed or on extended diversion
- Onsite deployment of state or federal disaster medical team, or alternate care site
- Implementation of a state-recognized crisis standards of care program

Requests for survey relief and supporting data should be submitted to <a href="mailto:dnvclientdropbox@dnv.com">dnvclientdropbox@dnv.com</a>. DNV will consider each situation individually and may request additional information to assist with the determination to postpone a survey. Other factors in the decision may include; actions taken to address staffing, the facility's compliance history, accreditation or certification effective dates, survey cycles, open CMS enforcement actions, complaint investigations or news reports, or DNV Healthcare USA Inc. | 400 Techne Center Dr. Suite 100, Milford, OH 45150 | <a href="mailto:contacthc@dnv.com">contacthc@dnv.com</a> | <a href="www.dnvcert.com/healthcare">www.dnvcert.com/healthcare</a>



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other publicly available data. Complaints requiring onsite investigation are not subject to postponement. DNV will acknowledge when a postponement request is granted but original survey dates may not be disclosed and rescheduled surveys will remain unannounced. In situations where an onsite reaccreditation survey must be postponed until after expiration of accreditation, DNV will extend accreditation in 60-day increments, up to a practical limit of 6 months. Survey postponements and accreditation extensions are reported to CMS.

DNV's process for remote annual surveys is designed to minimize risk and burden while preserving the value of annual surveys to ensure continued compliance, maintain progress toward ISO compliance or certification, and monitor ongoing corrective actions. DNV will consider the postponement criteria above for facilities for which even a remote survey could be burdensome, but postponement requests for onsite accreditation or reaccreditation surveys will be prioritized.

DNV Certification Program surveys for Stroke, Orthopaedics, Cardiac, Infection Prevention, Sterile Processing and Palliative Care will continue to be scheduled in advance and coordinated with the facility. Determinations about onsite or remote surveys are subject to certification program requirements. Initial Ventricular Assist Device (VAD) credentialing surveys must be performed onsite.

**DNV policy requires surveyors to meet CDC guidelines for full vaccination against COVID-19.** For all DNV onsite survey activity, surveyors will continue to wear face coverings according to CDC guidance for healthcare facilities. Surveyors will also follow your organization's protocols for screening, sanitizing, and distancing, including use of videoconference technology to accommodate restrictions on staff or access limitations to higher risk areas within the facility.

The HHS COVID-19 Public Health Emergency remains in effect until at least January 16, 2022 and is expected to be renewed. DNV will continue to monitor the status of the PHE, along with local and national conditions using data provided by CMS and CDC. We will adhere to any AO process changes that may be required by CMS and communicate any future adjustments as they emerge. Hospitals are encouraged to check for updated information on <u>current emergencies</u>, <u>waivers</u>, and <u>flexibilities</u> resulting from the continued PHE. Information on implementation of waivers can be found <u>here</u>.

DNV appreciates the accommodations our accredited and certified hospitals have made to support remote annual surveys as the Public Health Emergency has progressed. Those efforts, along with the ongoing commitment of our surveyors, have helped keep our hospitals safe, compliant, and on-cycle for accreditation and ISO 9001 compliance. As a new COVID-19 variant stresses your staff and communities as never before, we remain grateful for the ongoing support and commitment to ensure safe quality care.

Any questions or comments can be forwarded to the Healthcare Client Drop Box: <a href="mailto:dnvclientdropbox@dnv.com">dnvclientdropbox@dnv.com</a>.

For DNV Healthcare USA Inc.

Troy D McCann
Director of Accreditation