

SOC™ Process Changes Effective August 1

Recent changes identified by the Centers for Medicare & Medicaid Services (CMS) have resulted in modifications to the Statement of Conditions™ (SOC) component of The Joint Commission survey process. The changes, which become **effective August 1, 2016**, also affect the survey of “Life Safety” (LS) chapter requirements in the *Comprehensive Accreditation Manuals* for the **ambulatory care, behavioral health care, critical access hospital, hospital, home care, and nursing care center** programs.

As of August 1, 2016, the survey process will change as follows:

- The open Plan for Improvement (PFI) items will no longer be reviewed by the survey team.
- The open PFI will no longer be imported into the Final Report.
- All LS chapter deficiencies identified during survey will become Requirements for Improvement (RFIs) with a 60-day Evidence of Standards Compliance (ESC). For those deficiencies that require more than 60 days, a Time-Limited Waiver process is available.
- Only equivalency requests related to survey events will be reviewed.

Background

The SOC, which has been part of The Joint Commission’s accreditation process since 1995, was created to provide organizations with a process for developing a plan for improvement to correct self-identified deficiencies within a justifiable time frame based on budgeting and scheduling needs. The self-identified actions

were not documented during survey because the SOC already documented the deficiency. The Joint Commission also instituted the Interim Life Safety Measure (ILSM) process to mitigate risks to patient safety while deficiencies were being resolved.

All open, accepted PFI items in the SOC were required to be completed within six months of their projected completion date. Occasionally, an organi-

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zation would need additional time to complete the corrective action, and The Joint Commission granted extension requests. Many of these extension requests occurred during the six-month automatic extension period.

Changes from CMS

CMS identified these changes required for the SOC process:

- No longer allowing the SOC to document self-identified deficiencies; instead, taking the self-identified deficiencies and converting those to RFIs by the surveyor
- No longer allowing more than 60 days for corrective actions unless approved by the CMS regional office
- The surveyor citing all deficiencies replacing the extension request component with a Time-Limited Waiver process, using the Survey-Related Plan for Improvement (SPFI) process that will be managed and tracked by the CMS regional office

- Managing the survey-related equivalency process, as defined by CMS, using Salesforce and the SOC to manage and track the CMS regional office action
- Removing the six-month automatic extension
- No longer granting requested extensions

Joint Commission leadership, after reviewing the restrictions being placed on the SOC, has determined that the Basic Building Information and PFI components of the SOC no longer fit the quality assessment program as it was originally designed and will become an optional management program that will not be a part of the survey process. Post survey, the CMS Time-Limited Waiver and equivalency components of the SOC will be used to manage survey-related deficiencies.

For an in-depth look at these changes, please see the *Clarifications and Expectations* column that begins on page 6 of this issue. All questions may be directed to The Joint Commission Department of Engineering at 630-792-5900. 