Date

Richard Grindstaff, R.N.

Bureau Chief of Hospital Standards

Section for Health Standards & Licensure

Department of Health and Senior Services

P.O. Box 570

Jefferson City, MO 65102-0570

Dear Mr. Grindstaff:

The Centers for Medicare & Medicaid Services ended its suspension of hospital survey activities on March 23, 2021. Since then, we have been appreciative of the efforts the Survey Agency has made to follow hospital infection control policies and understand resource limitations in conducting hospital surveys. However, XXX’s (Hospital name) expenditure of resources to accommodate surveyors and write and implement plans of correction during the ongoing pandemic is adversely affecting patient care. The resource demand is exacerbated by the resource intensity of COVID-19 patients and the backlog of patients who have delayed care because of the pandemic.

As you know, Missouri hospitals continue to respond to surges in SARS-CoV-2 infections and closely are monitoring new variants like Omicron. The most recent surge is straining our health care system. Hospitals are experiencing a domino effect as they try to transfer or need to accept transferred patients to or from other facilities. XXX (Hospital) is experiencing an exceptionally high occupancy rate of XXX, based on staffed beds rather than licensed bed capacity. The high occupancy rate also reflects deferred non-emergent but necessary treatments for which additional delay would worsen health outcomes and increase treatment costs. Additionally, XXX is experiencing a significant increase in influenza cases and hospitalizations of \_\_\_\_\_% over last year.

CMS acknowledges a community-level COVID-19 surge could adversely impact a hospital’s operations and ability to accommodate an onsite compliance survey. Currently, XXX (Hospital explains COVID impact). As previously noted, CMS must also consider the severity of patients now presenting to hospitals for acute care. XXX (Hospital explains patient population) Additionally, the current workforce shortage has resulted in an all-hands-on deck approach. Resources previously used to provide relief outside of direct care delivery now are being devoted to directly support care delivery. XXX (Hospital explains workforce shortages) Finally, XXX(Hospital) has its emergency plan activated.

XXX (Hospital explains) is requesting assistance from the Department of Health and Senior Services to communicate our request for a temporary survey suspension [to CMS??]. The highest priority for XXX (hospital) is ensuring we have the resources available to manage surge and emergent healthcare needs. Currently, the proportion of hospital staff and resources at/across XXX (Hospital) dedicated to management of COVID-19 patients is approximately XXX. Include additional supporting information.

Should you have questions or wish to discuss our requests in more detail, please do not hesitate to contact XXX.

Sincerely,

XXX

c Donald Kauerauf

 Steve Bollin

 William Koebel