

MARCH 10, 2025

NURSING HOME UPDATE: CMS EXTENDS IMPLEMENTATION DATE OF SURVEYOR GUIDANCE CHANGES IN APPENDIX PP

On March 7, 2025, the Centers for Medicare & Medicaid Services (“CMS”) posted a **memo** dated March 10, 2025, that gives nursing homes and surveyors more time to prepare for implementation of new rules and updates to allow surveyors to add extra attention and increase oversight in nursing homes.

On November 18, 2024, the Quality, Safety & Oversight Group at CMS issued a memorandum entitled “REVISED: Revised Long-Term Care (LTC) Surveyor Guidance: Significant revisions to enhance quality and oversight of the LTC survey process.” (“New Surveyor Guidance Memo”). The March 7, 2025, CMS post updates the New Surveyor Guidance Memo, which had been previously updated on January 15, 2025.

UPDATED SURVEYOR GUIDANCE

The New Surveyor Guidance Memo updated surveyor guidance with the following goals: (1) revisit health and safety updates to address emerging trends in deficiency citations nationwide; (2) make revisions to ensure guidance remains aligned with current standards of practice and reflects the evolving needs of residents; and (3) update the guidance to maintaining the integrity of nursing home care.

The New Surveyor Guidance Memo revised the following areas of nursing home operations and care:

- Admission;
- Transfer and Discharge;
- Chemical Restraints/Unnecessary Psychotropic Medication;
- Resident Assessment;
- Nursing Services;
- Payroll-Based Journal;
- Quality of Life and Quality of Care;
- Administration;
- Medical Directors;
- Quality Assurance Performance Improvement; and
- Infection Prevention and Control.

See Hall Render’s summaries of the following revisions: [Transfers and Discharges](#) and [Medical Directors and Mental Health Assessments](#).

NEW EFFECTIVE DATE

The New Surveyor Guidance Memo is revised to move the implementation date from March 24, 2025, to April 28, 2025.

CMS also noted that revised surveyor resources will be released on April 28, 2025.

PRACTICAL TAKEAWAYS

- Effective April 28, 2025, surveyors will use these guidelines to survey and cite providers.
- A careful review of nursing home practices and procedures is needed.
- Facilities must review and train staff on the New Surveyor Guidance Memo.

If you have questions or would like additional information about this topic, please contact:

- Sean Fahey at (317) 977-1472 or sfahey@hallrender.com;
- Brian Jent at (317) 977-1402 or bjent@hallrender.com;
- Todd Selby at (317) 977-1440 or tselby@hallrender.com; or
- Your primary Hall Render contact.

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