



Center for Clinical Standards and Quality/ Quality, Safety & Oversight Group

Admin Info: 24-08-CLIA

DATE: December 18, 2023
TO: State Survey Agency Directors
FROM: Director, Quality, Safety & Oversight Group (QSOG)
SUBJECT: SURVEY TEAM COMPOSITION AND WORKLOAD REPORT
Form CMS-670 Completion Guidance

Memorandum Summary

The Centers for Medicare & Medicaid Services is providing additional guidance related to the recording of survey hours on Form CMS-670:

- **Form CMS-670 hour categories:** Guidance is provided on what should and should not be included in each category.
- **Survey-specific Form CMS-670:** Guidance is provided on how Form CMS-670 hours for follow-up/revisit surveys, specialty/subspecialty addition-only surveys, proficiency testing desk review surveys, complaint surveys, and licensure surveys should be recorded.

Background:

Based on discussions with the State Survey Agencies (SAs), how 670 hours are recorded varies from state to state. To improve the consistency and accuracy of data entry, CMS is providing additional guidance to SAs on the appropriate procedures for recording the following survey-related hours on Form CMS-670:

- Pre-survey;
- Onsite survey;
- Travel;
- Offsite survey;
- Supervisory review;
- Clerical/data entry;
- Follow-up/revisit survey;
- Specialty/subspecialty addition-only survey;
- Proficiency testing desk review survey;
- Complaint survey; and
- Licensure survey.

Form CMS-670 allows CMS to capture direct survey and travel time and related time necessary to prepare for the survey and complete the survey report. CMS understands that Form CMS-670 does not capture (nor intends to capture) all time spent on CLIA activities.

Discussion:

As the SA schedules each laboratory survey, it must maintain a record of the time spent in preparing, conducting, and closing out the survey, including the monitoring and recontacts involved in the resolution. As each CLIA survey or support activity is performed, the SA must record the time spent on the activity. Any time spent preparing for a laboratory survey and time spent in follow-up contacts to ensure compliance must be recorded. NOTE: All time is recorded in quarter-hour increments. Round off all other times to the nearest quarter hour.

Form CMS-670 breaks down reporting of time into the following categories: Pre-Survey, On-Site (12a–8a, 8a–6p, and 6p–12a), Travel, Off Site, Total SA Supervisory/Review, and Total SA Clerical/Data Entry, Total RO Supervisory/Review, and Total RO Clerical/Data Entry hours.

Figure 1: ASPEN Central Office (ACO) Screen Image for Form CMS-670 Hours Table

Arrival (B)	Depart (C)	Pre-Survey Hours (D)	On-Site 12a- 8a (E)	On-Site 8a- 6p (F)	On-Site 6p-12a (G)	Travel (H)	Off Site (I)
03/30/2023	03/30/2023	1.00	0.00	4.50	0.00	3.00	1.50
		1.00	0.00	4.50	0.00	3.00	1.50
		1.00	0.00	4.50	0.00	3.00	1.50

Office Hours...
Set All Hours
Close
Help

Figure 2: ACO Screen Image for Form CMS-670 Input Office Hours for Survey Category

Form 670 Input Office Hours ✕

	Survey Category	Total SA Supervisory/ Review Hours	Total SA Clerical/ Data Entry Hours	Total RO Supervisory/ Review Hours	Total RO Clerical/ Data Entry Hours	SOD Given To the Provider On-site at Completion of Survey
1	I - Recertification	0.25	0.25			<input type="checkbox"/>

Total SA Office Hours for All Survey Categories

Supervisory/Review Hours:

Clerical/Data Entry Hours:

Total RO Office Hours for All Survey Categories

Supervisory/Review Hours:

Clerical/Data Entry Hours:

OK
Cancel

Below is guidance on what should be included in each field.

Form CMS-670 hour categories

Pre-survey hours

Record:

- Pre-survey hours include a surveyor's time prior to the survey spent reviewing the facility's history and any phone calls or conferences directly relating to the survey.

Do not record:

- Time spent by clerical personnel retrieving files or organizing materials;
- Time spent on the telephone or email with initial applicants clarifying Form CMS-116 instructions or laboratory director qualifications; and
- Time spent by supervisors participating in pre-survey preparation activities.

Onsite hours (mandatory field for all members of the survey team for all survey types performed on site)

Record:

- Any survey activity conducted in the facility from the start of the Entrance Conference to the completion of the last survey activity or completion of the Exit Conference.

Do not record:

- Surveyor mealtimes unless a surveyor performed survey activities while eating; and
- Supervisor hours unless the supervisor participates in a survey as a surveyor.

Travel hours

NOTE: Surveyors must follow state travel guidelines for hours of work. The guidance below is for recording Form CMS-670 CLIA hours only.

Record:

- All actual travel to and from a facility should be reported for each surveyor;
- Time divided equally between different survey types. For example, if a follow-up/revisit survey is being done in conjunction with a complaint survey, the total travel time should be split equally between the two survey types; and
- The lesser of time spent in travel from either the surveyor's home to site or office to site.

Do not record:

- Time during travel that is considered non-work—for example, mealtimes; and
- Double-counted travel time:
 - Scenario #1—A survey agency is located in “City A.” A grouping of four facilities is located in “City B,” approximately 2 hours from “City A.” The surveyors travel 2 hours from “City A” to “City B” and complete the surveys of the four facilities within “City B,” traveling minimal distances between sites.

In this instance, travel hours should be shared equally among the four facilities. Total travel time in this instance is 4 hours (2 hours each way). Therefore, travel should be reported as 1 hour for each of the four facilities in order to result in an equitable assignment of time. NOTE: In this instance, travel must be split four ways to prevent the double-counting of travel time and subsequent skewing of travel data.

- Scenario #2—A survey agency is located in “City A.” On a given survey date, “City A” surveyors travel to a facility located in “City B,” approximately 1 hour from “City A.” Upon completion of the survey in “City B,” the surveyors travel to a facility located in “City C,” approximately 3 hours from “City A” (2 hours from “City B”). After completing the survey, the surveyors travel 3 hours to return to “City A.”

In this instance, reported travel should be split in a manner more reflective of the actual travel time to each facility. Total travel time in this instance is 6 hours (3 hours each way). The “City B” facility would be assigned 2 hours of travel: time taken to travel from “City A” to the “City B” facility (1 hour) times 2 (1 hr. x 2)—the figure is doubled so that an equitable portion of the return trip is captured. The “City C” facility would be assigned 4 hours of travel: time taken to travel from the “City B” facility to the “City C” facility (2 hours) times 2 (2 hrs. x 2)—the figure is doubled so that an equitable portion of the return trip is captured.

- Scenario #3—A survey agency is located in “City A.” On Day 1, the surveyor travels 30 minutes to get to the nearest airport and arrives 2 hours before the flight. The flight to “City B” is 3.5 hours. The surveyor stays at a hotel adjacent to the airport. On Day 2, the surveyor travels from the hotel to the first laboratory and back for a total of 1 hour. On Day 3, the surveyor travels 3 hours from the hotel to the second laboratory in “City C.” After completing the survey, the surveyor travels to a new hotel 15 minutes from the second laboratory in “City C.” On Day 4, the surveyor travels from the hotel to the third laboratory in “City C” and back for a total of 1 hour. On Day 5, the surveyor travels 3 hours back to “City B” to the airport. The surveyor arrives 2 hours before the 3.5-hour flight to “City A.” The surveyor travels 30 minutes back to the survey agency.

Shared travel time:

Travel time to and from “City B” on the first and fifth days = 30 minutes + 5.5 hours + 5.5 hours + 30 minutes = 12 hours. Travel time to and from “City C” on the third and fifth days = 3 hours + 3 hours = 6 hours

Laboratory specific time:

Travel time to first lab only = 1 hour
Travel time to second lab only = 15 minutes
Travel time to third lab only = 1 hour

All three labs should share in the travel time to “City B.” $12 \text{ hours} / 3 \text{ labs} = 4 \text{ hours}$ each. The second and third labs should share in the travel time to “City C.” $6 \text{ hours} / 2 \text{ labs} = 3 \text{ hours}$ each.

Total travel time first lab = 4 hours + 1 hour = 5 hours
Total travel time second lab = 4 hours + 3 hours + 15 minutes = 7.25 hours
Total travel time third lab = 4 hours + 3 hours + 1 hour = 8 hours
Total travel time of trip = 20.25 hours.

NOTE: For unique travel circumstances, please contact CMS for additional guidance.

Offsite hours

Record:

- Any activities required to develop a Form CMS-2567, including any time spent reviewing and finalizing the survey certification kit, the surveyor discussing survey activity during the supervisory review, rewriting the report after the supervisory review, filling out survey forms, and writing the Form CMS-2567; and
- Work performed at a hotel or other site during the evening on a survey trip.

Do not record:

- Time spent on quality assurance review of surveyor's write-up of deficiencies; and
- Time spent answering calls and emails from the laboratory after the Form CMS-2567 has been received by the laboratory. This time should be recorded in the follow-up/revisit survey Form CMS-670 hours.

Total supervisory review hours

Record:

- All the time spent by the person responsible for reviewing the survey team's decisions and survey documentation.

Do not record:

- SA quality assurance or peer review; and
- Supervisory time for individual surveyor performance review.

Total clerical/data entry hours

Record:

- All hours required to complete all clerical functions in finalizing the survey packet. These duties may include generating letters and data entry.

Do not record:

- Time spent involved in making surveyor travel arrangements; and
- Technical assistance to laboratories on completing application forms.

Follow-up/Revisit Surveys

Follow-up/revisit survey activities (onsite and offsite) should be recorded on a new Form CMS-670. Each allegation of compliance (AoC) or plan of correction (PoC) should initiate a new follow-up/revisit survey. This will create a new Form CMS-670 form to record the time spent on reviewing the AoC/PoC.

Record:

Onsite:

- AoC/PoC review should be recorded in the pre-survey hours; and
- Form CMS-2567 preparation for cases in which uncorrected or new deficiencies are cited should be recorded in the offsite hours.

Offsite:

- **If performing a follow-up/revisit survey offsite, make sure to change the survey extent to Offsite/Paper in the Extent section of the Survey Properties window;**
- AoC/PoC review should be recorded in the pre-survey hours; and
- Time to prepare a request for follow-up documentation or provide a review of the AoC/PoC in writing to a laboratory should be recorded in the offsite hours.

Do not record:

- SA quality assurance review.

NOTE: For guidance on Form CMS-670 hours spent in the case of an appeal, please refer to the State Operations Manual Chapter 6.

Specialty/Subspecialty Addition-Only Surveys

Specialty/subspecialty addition-only surveys should be entered as a follow-up/revisit survey for purposes of capturing the Form CMS-670 hours.

Proficiency Testing Desk Review Surveys

Because the survey is performed offsite, make sure to change the survey extent to Offsite/Paper in the Extent section of the Survey Properties window.

Record:

- Time spent reviewing CASPER 153/155D report (in the pre-survey hours);
- Time spent contacting the proficiency testing program or laboratory to confirm the proficiency testing scores (in the offsite hours); and
- Any activities required to develop a Form CMS-2567 including time spent writing the Form CMS-2567 (in the offsite hours).

Do not record:

- Time spent answering calls and emails from the laboratory after the Form CMS-2567 has been received by the laboratory. This time should be recorded in the follow-up/revisit survey Form CMS-670 hours.

Complaint Surveys

Multiple complaints against a facility investigated at one time may be reported on one Form CMS-2567. If a complaint is investigated while a surveyor is on site conducting a certification survey, time that cannot be specifically attributed to one survey or the other should be divided equally between the two surveys.

Complaint review should be recorded as pre-survey time only for the surveyor preparing to visit the facility. Do not record time spent in calls regarding the status/results of complaints, calls disputing findings of the investigation, and/or calls from the complainant raising additional issues after the complaint survey has been completed.

Licensure Surveys

Form CMS-670 data must not reflect state licensure activity.

Contact:

For questions or concerns relating to this memorandum, please contact the LabExcellence mailbox at LabExcellence@cms.hhs.gov.

Effective Date:

Immediately. Please communicate to all appropriate staff within 30 days.

/s/

David R. Wright

Director, Quality, Safety & Oversight Group

Resources to Improve Quality of Care

Check out CMS's new [Quality in Focus](#) interactive video series. The series of 10–15 minute videos are tailored to provider types and aim to reduce the deficiencies most commonly cited during the CMS survey process, like infection control and accident prevention. Reducing these common deficiencies increases the quality of care for people with Medicare and Medicaid.

Learn to:

- *Understand surveyor evaluation criteria*
- *Recognize deficiencies*
- *Incorporate solutions into your facility's standards of care*

See the [Quality, Safety, & Education Portal Training Catalog](#), and select [Quality in Focus](#).