

Governing Body and QAPI Requirements

A Brief Review of the CMS Quality Assessment and Performance Improvement (QAPI) Program

July 2023

CMS Terminology

Centers for Medicare & Medicaid Services (CMS): Hospitals are required to be in compliance with Federal CMS requirements set forth in the Conditions of Participation (CoP) in order to receive Medicare/Medicaid payment.

Quality Assessment and Performance Improvement (QAPI): CoP that requires hospitals to develop, implement, and maintain an effective, ongoing, hospital-wide, data-driven quality assessment and performance improvement program for services provided directly and under contract/agreement in an effort to deliver safe, quality patient care and prevent adverse events and patient harm.



CMS Terminology

Governing Body: An individual or group of individuals legally responsible and accountable for the operational conduct of the hospital.

Functions and responsibilities include:

- Ensure safe, quality patient care
 - Provided directly or under contracts
- Hospital plan and budget
- Compliance with all CMS Conditions of Participation (CoP)
- Active engagement in oversight and review of QAPI program
- Compliance with state or other government agency



CMS Terminology

The Governing Body must have ongoing commitment to:

- Create safe systems of care
- Receive reports from senior leadership on:
 - Program objectives
 - Plans
 - Personnel
 - Budget
 - QAPI activities

- Establish a culture of safety and quality
- Define importance of QAPI activities throughout the institution

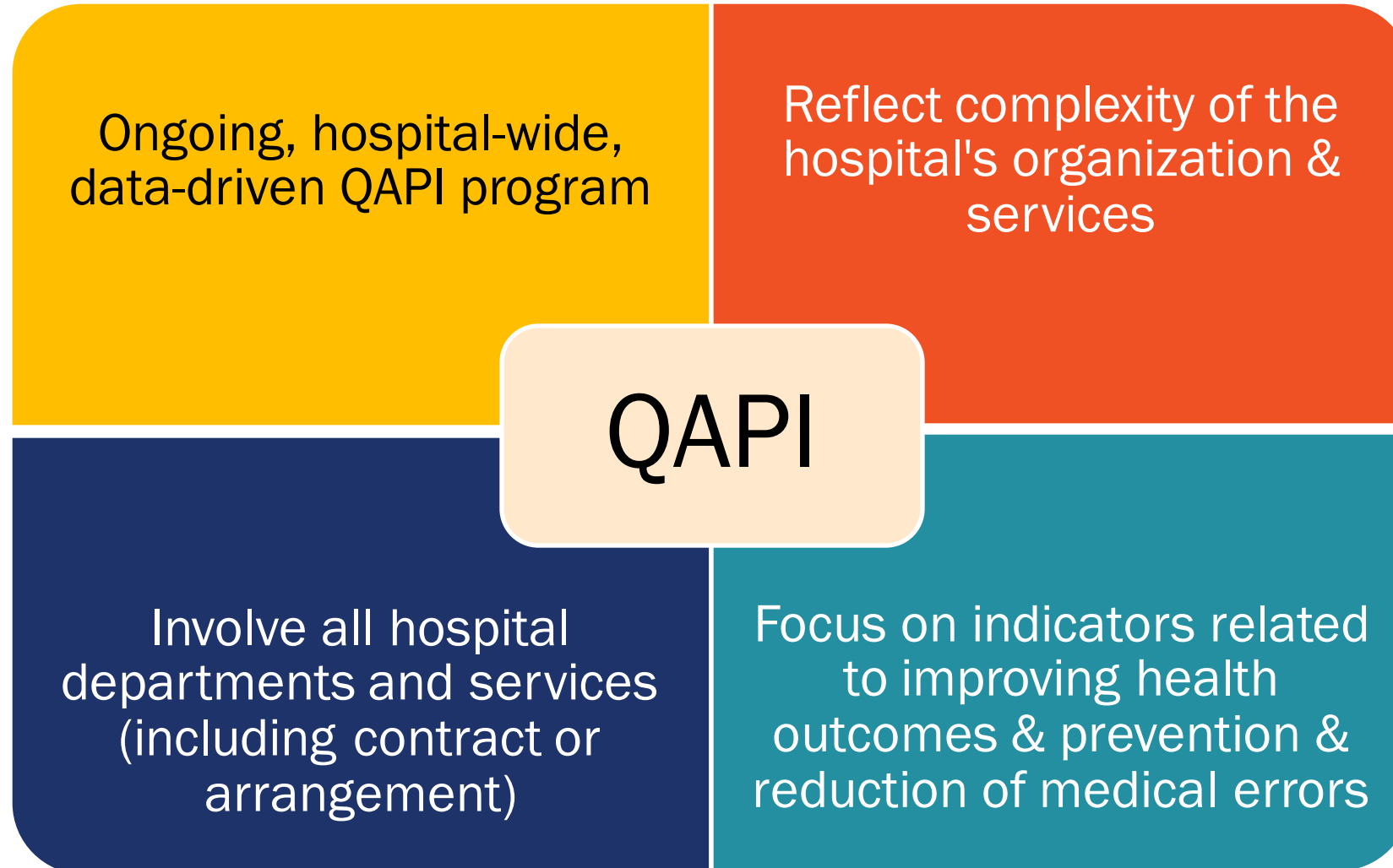


*From the CMS Code of Federal Regulations:
January 24, 2003*

CMS Terminology

“In addition to its focus on the importance of a sustainable QAPI program to promote patient safety and reduce harm, the updated QAPI CoP interpretive guidance emphasizes the integral role hospital leadership plays in advancing a sustained program for improvement throughout the hospital. **A component of the successful execution of a hospital QAPI program requires engagement by the hospital’s governing body.** Leadership oversight in the development and ongoing planning of a hospital’s QAPI activities is an essential component. This includes ensuring that clear expectations for safety are established and communicated hospital-wide.”

Core Elements of a Quality Assessment and Performance Improvement (QAPI) Program



Key Role of the Governing Body

Governing Body must be actively engaged in the oversight & periodic review of the QAPI program

QAPI plan is developed, implemented & maintained

Annual projects based on complexity & scope of services

Frequency & detail of data collection

Effectiveness of implemented improvement actions

High-risk, high-volume, or problem-prone areas

Documenting & evidence of active engagement

Thank You