



Immediate Change to Eligibility Requirements for Deemed Status Hospitals

Effective immediately for hospitals that use Joint Commission accreditation for deeming purposes, at least two active inpatients will be required at the time of all initial or resurvey events. If a hospital does not have two active patients at the time of survey, the survey or resurvey will not continue. This new requirement does not apply to critical access hospitals and psychiatric hospitals.

This change is the result of an October 27, 2017, memo* from the Centers for Medicare & Medicaid Services (CMS) regarding its definition of a hospital—with a focus on how hospitals are primarily engaged in providing inpatient care to patients. The memo states the following:

* *Centers for Medicare & Medicaid Services. Center for Clinical Standards and Quality/Survey & Certification Group. S&C Memo: 17-44-Hospitals. (Revised: Oct 27, 2017.) Accessed Nov 20, 2017. <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-17-44-Revised-102717.pdf>*

Hospitals must have at least two inpatients at the time of the survey in order for surveyors to conduct the survey. However, just because a facility has two inpatients at the time of a survey does not necessarily mean that the facility is primarily engaged in inpatient care and satisfies all of the statutory requirements to be considered a hospital for Medicare purposes. Having two patients at the time of a survey is merely a starting point in the overall survey and certification process.

If a hospital does not have at least two inpatients at the time of a survey, a survey will not be conducted at that time.

This requirement will be reflected in the spring E-dition® release and print 2018 Update 1 of the *Comprehensive Accreditation Manual for Hospitals*. Questions may be directed to your organization's assigned account executive. 