CMS Releases Revision to Appendix Q Immediate Jeopardy Guidelines

Information posted April 5, 2019

Nursing facility, Intermediate Care Facility for Individuals with Intellectual Disabilities, and certified Home Health and Hospice providers are being informed that on March 5, 2019, the Centers for Medicare & Medicaid Services (CMS) issued a revised Appendix Q to the State Operations Manual. Appendix Q provides guidance to surveyors on identifying and citing immediate jeopardy (IJ) situations in all provider and supplier types governed by CMS.

Providers should review the revised Appendix Q guidelines and pay particular attention to the key components of an IJ and key changes in the Core Appendix Q that will be used by surveyors. The key changes in the Core Appendix Q include:

- Likelihood of harm instead of potential for serious harm
- Culpability requirement has been removed - the previous version of Appendix Q made culpability a required component to cite immediate jeopardy
- Psychosocial harm considerations - Core Appendix Q includes a section instructing surveyors to consider whether noncompliance has caused or made likely serious mental or psychosocial harm to recipients.
- No automatic immediate jeopardy citations - each immediate jeopardy citation must be decided independently

To review the details of the information described in this alert, providers should read CMS QSO-19-09-ALL Revisions to Appendix Q, Guidance on Immediate Jeopardy and review the revised Appendix Q attached to QSO-19-09-ALL. These documents can be found HERE.

In addition, providers can watch a CMS training video for more information. The video can be found