

**Revisions to CMS-3070I  
INDIVIDUAL OBSERVATION WORKSHEET (CMS-3070I)**

Page #	Section	Action to be performed	Changes to the Application	Reasons for the Change
1	Title	<ul style="list-style-type: none"> <li>Change the title at top of page 1 from  <b><i>“Individual Observation Worksheet”</i></b>  to  <b><i>“ICF/IID Survey Observation Worksheet”</i></b></li> </ul>	<ul style="list-style-type: none"> <li>Change the title at top of page 1 from  <b><i>“Individual Observation Worksheet”</i></b>  to  <b><i>“ICF/IID Survey Observation Worksheet”</i></b></li> </ul>	<ul style="list-style-type: none"> <li>The existing CMS-3070I form is titled <b><i>“Individual Observation Worksheet.”</i></b> We believe that this title can be confusing if used on the revised version of the CMS-3070I form because it seems to indicate that either this form is to be used to record one individual observation or that this form is to be used to record the observation of one particular individual.</li> <li>Surveyors frequently perform multiple observations during the survey of an ICF/IID facility.</li> <li>There is no guidance or prohibitions that would prevent surveyors from using the CMS-3070I form to record multiple observations performed during one survey.</li> </ul> <p>Therefore, we have revised the CMS-3070I form to allow surveyors to record all of their observations on one CMS-3070I form.</p>
1	1 <sup>st</sup> row	<ul style="list-style-type: none"> <li>Remove the word <b><i>“Date”</i></b> field in the 2<sup>nd</sup> data box in the 1<sup>st</sup> row at the top of the CMS-3070I form</li> <li>Add the words <b><i>“Type of Survey”</i></b> in the 2<sup>nd</sup> text box in the 1<sup>st</sup> row</li> </ul>	<ul style="list-style-type: none"> <li>Remove the word <b><i>“Date”</i></b> field in the 2<sup>nd</sup> data box in the 1<sup>st</sup> row at the top of the CMS-3070I form</li> <li>Add the words <b><i>“Type of Survey”</i></b> in the 2<sup>nd</sup> text box</li> </ul>	<ul style="list-style-type: none"> <li>We believe that the date field on the existing version of the CMS-3070I form is intended to record the date that the CMS-3070I form is completed. However, this information is not important to CMS or the SA.</li> <li>Important information to surveyors, the SA and CMS is the type of survey performed. This is because there</li> </ul>

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		<p>located at the top of the CMS-3070I form.</p> <ul style="list-style-type: none"> <li>Modify the title of the existing 1<sup>st</sup> column from <b><i>“Time”</i></b> to <b><i>“Observations Date(s)”</i></b></li> </ul>	<p>in the 1<sup>st</sup> row located at the top of the CMS-3070I form.</p> <ul style="list-style-type: none"> <li>Modify the title of the existing 1<sup>st</sup> column from <b><i>“Time”</i></b> to <b><i>“Observations Date(s)”</i></b></li> </ul>	<p>are different procedures and processes for each type of survey.</p> <ul style="list-style-type: none"> <li>For example, for an initial survey, the facility is new to the AO and the surveyors, so they take time to become familiar with the facilities medical record system, learn how to access the records, become familiar with the facilities policies and procedures and the facility itself. This would mean that surveyors that are new to a facility must review all documents, records extra carefully so as not to miss anything.</li> <li>Whereas, in renewal surveys, the surveyor may have previously been involved in a survey at that facility had gained familiarity with the facilities medical record system, the layout of the facility, it’s policies &amp; procedures, and may be familiar with the staff. Such familiarity makes the surveyors job a little easier if they know how to access the facilities medical records system, understand their policies &amp; procedures, and have reviewed them previously.</li> <li>A complaint survey may be focused on only those issues that are the subject of the complaint, and would not be a full survey.</li> </ul> <p>Therefore, we have removed the word <b><i>“Date”</i></b> in the 2<sup>nd</sup> text box of row 1 and replaced it with the words <b><i>“Type of Survey”</i></b> because this information is more important than</p>

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				<p>the date the form was completed. Knowing the type of survey performed can help guide the surveyors is how to perform the survey.</p> <p>We have also changed the title of the 1<sup>st</sup> column from <b><i>“Time”</i></b> to <b><i>“Observation Date”</i></b>.</p> <ul style="list-style-type: none"> <li>• We did this because, during the course of a survey, surveyor(s) or may do multiple observations with several individuals at the facility (i.e. - patients, patient’s family members, patient care staff, the facility management personnel, etc.).</li> <li>• If the survey last for several days, the observations may be performed on different days. Therefore, it is important that the date of each observation be recorded in the same area with the rest of the observation information.</li> </ul>
1	2 <sup>nd</sup> row	<ul style="list-style-type: none"> <li>• Delete the 2<sup>nd</sup> row, which collects <b><i>“Location/Start”</i></b> in both of the 2 data fields in this row.</li> <li>• Add a new column #2 titled <b><i>“Observation Start &amp; End Time(s)”</i></b></li> </ul>	<ul style="list-style-type: none"> <li>• Delete the 2<sup>nd</sup> row, which collects <b><i>“Location/Start”</i></b> in both of the 2 data fields in this row.</li> </ul>	<ul style="list-style-type: none"> <li>• The 2<sup>nd</sup> row of the existing CMS-3070I form contains 2 separate text boxes, which both contain <b><i>“Location/Start”</i></b>. It is unclear what information the <b><i>“Location/Start”</i></b> data fields are intended to collect, or why this same data field is listed twice.</li> <li>• We believe that the 2 <b><i>“Location/Start”</i></b> fields may be intended to collect the location and start time for 2 surveyor observations. However, we believe that</li> </ul>

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		<ul style="list-style-type: none"> <li>Add a new column #4 titled <b><i>“Observation Location(s).”</i></b></li> </ul>	<ul style="list-style-type: none"> <li>Add a new column #2 titled <b><i>“Observation Start &amp; End Time(s)”</i></b></li> <li>Add a new column #4 titled <b><i>“Observation Location(s).”</i></b></li> </ul>	<p>these data fields are not helpful, necessary, or appropriate as located at top of the CMS-3070I form for several reasons.</p> <ul style="list-style-type: none"> <li>First, we believe that each of these data fields request 2 separate and very different pieces of information (i.e. (1) location of observation and (2) start time of observation. We believe, that this information should be collected separately, in separate data fields, but in a different location.</li> <li>Second, we do not believe that there is adequate space in each of the 2 data fields in the 3<sup>rd</sup> row of the existing version of the CMS-3070I form in which to document both the observation location and the observation start time.</li> <li>Third, since there are only 2 text boxes, which contain the <b><i>“Location/Start”</i></b> data fields, the surveyor would essentially be limited to documenting this information for only 2 observations on each CMS-3070I form. Most times during a survey, the surveyors will perform more than 2 observations. Therefore, the current versions of the CMS-3070I form would limit the surveyor to documenting only 2 observations per form.</li> </ul>

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				<ul style="list-style-type: none"> <li>• Also, there is no way to tell what information in the <b><i>“Start/Location”</i></b> fields at the top of the form corresponds with the information in the columns below. For example, if there are 5 observations documented in the columns below, but only 2 <b><i>“Start/Location”</i></b> data fields completed, how are other surveyors, the SA, or CMS to know which of the 5 Observation entries correspond with the 2 <b><i>“Start/Location”</i></b> entries above?</li> <li>• We believe that the start time and location for each observation should definitely be recorded, but should be recorded in the columns along with the rest of the observation information.</li> </ul> <p>Therefore, we have added a new 2<sup>nd</sup> column titled <b><i>“Observation Start &amp; End Time(s)”</i></b></p> <p>We have also added a new 4th column titled <b><i>“Observation Location(s)”</i></b> to collect the location where the observation took place.</p> <ul style="list-style-type: none"> <li>• We believe that relocating these data fields to the columns will allow the surveyors to document multiple observations performed for the same survey on the same CMS-3070I form.</li> </ul>

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1	2 <sup>nd</sup> row (new)	<ul style="list-style-type: none"> <li>• Add a new 2<sup>nd</sup> row, with 2 text boxes</li> <li>• Add the following text to each text box:               <ul style="list-style-type: none"> <li>○ <b><u>Left box:</u></b> “Survey Start Date”</li> <li>○ <b><u>Right box:</u></b> “Survey End Date”</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Add a new 2<sup>nd</sup> row, with 2 text boxes</li> <li>• Add the following text to each text box:               <ul style="list-style-type: none"> <li>○ <b><u>Left text box:</u></b> “Survey Start Date”</li> <li>○ <b><u>Right text box:</u></b> “Survey End Date”</li> </ul> </li> </ul>	<p>We have deleted the existing 2<sup>nd</sup> row and added a new 2<sup>nd</sup> row with 2 new text boxes which collect the following new information:</p> <p style="text-align: center;"><b><i>Left box text:</i></b> “Survey Start Date”</p> <p style="text-align: center;"><b><i>Right Text Box:</i></b> “Survey End Date”</p> <ul style="list-style-type: none"> <li>• We are adding these new data fields because we believe that the survey start and end dates is important information that helps identify which survey a particular CMS-3070I form belongs. For example, if the facility name placed on a CMS-3070I form were incorrect or misspelled, the survey start and end dates might help the surveyor, SA or CMS identify the facility surveyed.</li> </ul>
1	3 <sup>rd</sup> row	<ul style="list-style-type: none"> <li>• Delete the 3<sup>rd</sup> row, which collects <b><i>“Time/Start”</i></b> in the 1<sup>st</sup> data fields, and <b><i>“Time/Finish”</i></b> in the 2<sup>nd</sup> data field.</li> <li>• Add a new column #2 titled <b><i>“Observation Dates, Start &amp; End Times”</i></b></li> </ul>	<ul style="list-style-type: none"> <li>• Delete the 3<sup>rd</sup> row, which collects <b><i>“Time/Start”</i></b> in the 1<sup>st</sup> data fields and <b><i>“Time/Finish”</i></b> in the 2<sup>nd</sup> data field.</li> <li>• Add a new column #2 titled <b><i>“Observation Dates, Start &amp; End Times”</i></b></li> </ul>	<ul style="list-style-type: none"> <li>• The 3<sup>rd</sup> row of the existing version of the CMS-3070I form contains 2 data fields:               <p style="text-align: center;">Left Side: <b><i>“Time/Start”</i></b></p> <p style="text-align: center;">Right Side: <b><i>“Time/Finish”</i></b></p> </li> <li>• It is unclear whether the 2 data fields are intended to collect the start and end times of the survey, or for an individual observation.</li> <li>• If these data fields are intended to collect the start and end time of an observation, the surveyor would be limited to recording this information for only 1</li> </ul>

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				<p>observation since the current version of the CMS-3070I form contains only one set of these data fields. Therefore, we do not think these data fields are necessary or useful in their current form and location at the top of the CMS-3070I form.</p> <ul style="list-style-type: none"> <li>We believe that the start and end time for each observation should be documented, but should be documented in the same location with the other observation information.</li> </ul> <p>Therefore, we have added a new column #2 titled <b><i>“Observation Start &amp; End Times.”</i></b></p> <ul style="list-style-type: none"> <li>We believe that adding a column with this data field will allow the surveyors to document multiple observations performed during the same survey on the same CMS-3070I form.</li> </ul>
1	4 <sup>th</sup> row	<ul style="list-style-type: none"> <li>Delete the 4<sup>th</sup> row of the existing CMS-3070I form.</li> <li>Create a new 3<sup>rd</sup> column titled <b><i>“Name of Surveyor Conducting Observation.”</i></b></li> </ul>	<ul style="list-style-type: none"> <li>Delete the 4<sup>th</sup> row of the existing CMC-3070I form.</li> <li>Create a new 3<sup>rd</sup> column titled <b><i>“Name of Surveyor Conducting Observation.”</i></b></li> </ul>	<ul style="list-style-type: none"> <li>We believe that the <b><i>“Surveyor”</i></b> data field is intended to document the name of a surveyor that collects the Observation information that is documented on the CMS-3070I form.</li> <li>We further believe that the <b><i>“Client Codes”</i></b> data field is intended to allow the surveyor conducting the Observation to document the code name used for the person observed, as their actual names should not be</li> </ul>

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		<ul style="list-style-type: none"> <li>• Create a new 5<sup>th</sup> column titled "<i>Client Codes.</i>"</li> </ul>	<ul style="list-style-type: none"> <li>• Create a new 5<sup>th</sup> column titled "<i>Client Codes.</i>"</li> </ul>	<p>used. Such code names might be "Patient A", "Patient B", "Patient C", etc., or "RN1", "RN2", "RN3", etc.</p> <ul style="list-style-type: none"> <li>• Having these data fields located at the top of the CMS-3070I form limits the amount of information that can be documented in them because they are a limited size and allow only one line of these. Therefore, these data fields are not conducive to documenting the names of multiple surveyors who, might conduct Observations during the survey. Also, this might limit the CMS-3070I form to use for documenting the survey information for Observations performed by only one surveyor. If several surveyors perform Observations during the same survey, they would each have to fill out separate CMS-3070I forms. The new "Name of Surveyor Conducting Observation" column will allow several surveyors to document complete information about multiple Observations on the same CMS-3070I form.</li> <li>• Also, if information about multiple surveys is documented in the columns below, it would be difficult for CMS or the State Survey Agency to determine which of this survey information these data fields apply to.</li> <li>• Finally, we believe that the name of the surveyor and client codes should be recorded, but should be recorded in the same area where the rest of the</li> </ul>



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				<p>Observation information is documented. Therefore, we have added a new 3<sup>rd</sup> column titled <b><i>“Name of Surveyor Conducting Observation”</i></b> which will collect the name of the surveyor that conducts each Observation. We have also created a new 5<sup>th</sup> column titled <b><i>“Client Codes”</i></b> which will collect this information for each Observation conducted.</p>
2	Top margin of page 2form	Add the standard header to the top margin of page 2.	Add the standard header to the top margin of page 2.	<ul style="list-style-type: none"> <li>On page 2 of the current version of the CMS-3070I form, there is no header. Such a header is usually included on all pages of CMS forms.</li> </ul> <p>Therefore, we have added this header the page 2 of the revised version of the CMS-3070I form.</p>
2	Top of page 2	Add the name of the form to the top of page 2	<p>We have added the following form name to the top of page 2:</p> <p>“ICF/IID SURVEY OBSERVATIONS WORKSHEET – CMS-3070I (continued)”</p>	<ul style="list-style-type: none"> <li>There is no form title on page 2 of the existing version of the CMS-3070I form.</li> <li>We believe that it is necessary for every CMS form to have the form title and page number on each page of the form. We say this because if a multiple page form were to become separated, the pages could easily be identified and put back together in the proper order.</li> </ul> <p>Therefore, we have added the form title at the top of the revised CMS-3070I form.</p>

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2	Top of page 2	<p>Add a new row, at top of page 2, under the form name, to add the following 3 new data fields:</p> <p><b>Left side:</b> Facility Name</p> <p><b>Middle:</b> Survey Start Date</p> <p><b>Right side:</b> Survey End Date</p>	<p>Add a new row, at top of page 2, under the form name, to add the following 3 new data fields:</p> <p><b>Left side:</b> Facility Name</p> <p><b>Middle:</b> Survey Start Date</p> <p><b>Right side:</b> Survey End Date</p>	<ul style="list-style-type: none"> <li>• There is no title or data fields that collect identifying information, such as the name of the facility being surveyed or survey dates on the 2<sup>nd</sup> page of the existing version of the CMS-3070I form.</li> <li>• We believe that this is a problem because if the pages of several completed CMS-3070I forms were to become mixed up, there would be no way for the SA or CMS to identify which 2<sup>nd</sup> pages belong to which 1<sup>st</sup> pages of the CMS-3070I forms.</li> </ul> <p>We have corrected this oversight by adding a new row at the top of the 2<sup>nd</sup> page with 3 data fields to collect the following information:</p> <p><b>Left side:</b> Facility Name <b>Middle:</b> Survey Start Date <b>Right side:</b> Survey End Date</p> <ul style="list-style-type: none"> <li>• We believe that adding this row with these data fields will make the 2<sup>nd</sup> page of the CMS-3070I form more identifiable and therefore more secure.</li> </ul>
2	Bottom of page	<ul style="list-style-type: none"> <li>• Remove the PRA Disclosure Statement from page 2.</li> </ul>	<ul style="list-style-type: none"> <li>• Remove the PRA Disclosure Statement from page 2.</li> </ul>	<ul style="list-style-type: none"> <li>• On the existing version of the CMS-3070I page, the PRA disclosure statement is located on the bottom of the 2<sup>nd</sup> page. This PRA disclosure statement is problematic for the following reasons: <ul style="list-style-type: none"> <li>○ It is outdated and therefore not accurate;</li> </ul> </li> </ul>

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				<ul style="list-style-type: none"> <li>○ It is squished at the end of the data columns at the end of page 2, and</li> <li>○ PRA disclosure statement text is in a very tiny font and difficult to read.</li> <li>○ The PRA disclosure statement takes up valuable space at the bottom of page 2 upon which Observation information can be documented.</li> </ul>
New page #3	Top of page	<ul style="list-style-type: none"> <li>● Add a new 3<sup>rd</sup> page.</li> <li>● Add updated PRA Disclosure Statement language in 12-point font on the new 3<sup>rd</sup> page.</li> </ul>	<ul style="list-style-type: none"> <li>● Add a new 3<sup>rd</sup> page.</li> <li>● Add updated PRA Disclosure Statement language in 12-point font on the new 3<sup>rd</sup> page.</li> </ul>	<ul style="list-style-type: none"> <li>● To remedy the situations stated above, we have deleted the inaccurate and difficult to read PRA disclosure language from the bottom of page 2.</li> <li>● We have added a new 3<sup>rd</sup> page and added updated and accurate PRA disclosure language on this page. This PRA disclosure statement is in 12-point font that is clearly visible and easy to read.</li> </ul>