

Department of Health and Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**CMS'S RELIANCE ON PUERTO RICO'S  
CERTIFICATION SURVEYS COULD NOT  
ENSURE THE QUALITY OF CARE  
PROVIDED TO MEDICARE HOSPICE  
BENEFICIARIES BY SERVICIOS  
SUPLEMENTARIOS DE SALUD, INC.**

*Inquiries about this report may be addressed to the Office of Public Affairs at  
[Public.Affairs@oig.hhs.gov](mailto:Public.Affairs@oig.hhs.gov).*



Gloria L. Jarmon  
Deputy Inspector General  
for Audit Services

June 2015  
A-02-11-01028

# *Office of Inspector General*

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## EXECUTIVE SUMMARY

*CMS's reliance on Puerto Rico's certification surveys could not ensure the quality of hospice care provided to Medicare beneficiaries by Servicios Suplementarios de Salud, Inc.*

### WHY WE DID THIS REVIEW

Hospice care is a program of palliative care that provides for the physical, emotional, and spiritual care needs of a terminally ill patient and his or her family. Hospices must comply with Federal and State requirements to ensure that hospice care is furnished by qualified workers. Prior Office of Inspector General (OIG) reviews of personal care services found that services were provided by personnel who did not meet State requirements. OIG is performing reviews in various States to determine whether similar vulnerabilities exist at hospices.

The objective of this review was to determine whether the Centers for Medicare & Medicaid Services' (CMS) reliance on the Puerto Rico Department of Health's (health department) certification surveys of Servicios Suplementarios de Salud, Inc. (Servicios), ensured quality of care and that adequate protection was provided to Medicare beneficiaries.

### BACKGROUND

A hospice is a public agency, private organization, or a subdivision of either that is primarily engaged in providing care to terminally ill individuals. Hospice care can be provided to individuals in a home, hospital, nursing home, or hospice facility.

The Social Security Act includes requirements that are intended, in part, to ensure the quality of care provided to Medicare beneficiaries in hospices. Federal regulations set the standards that a hospice program must comply with to participate in the Medicare program, including that hospices must comply with all Federal, State, and local laws and regulations related to the health and safety of patients (42 CFR § 418.116). Medicare providers must also ensure that services are of a quality that meets professionally recognized standards of health care (42 CFR § 1004.10(b)).

In Puerto Rico, CMS contracts with the health department to conduct certification surveys of hospices. These surveys determine whether hospices meet Medicare health, safety, and program standards, as well as Federal and Commonwealth requirements related to personnel qualifications. As of April 3, 2014, the health department's last certification survey of Servicios was conducted in March 2007.

### HOW WE CONDUCTED THIS REVIEW

We limited our review to Servicios personnel who provided direct care to Medicare beneficiaries during the period July 1, 2008, through June 30, 2010. During this period, a total of 170 Servicios workers (152 health care professionals and 18 volunteers) provided services to Medicare beneficiaries.

## **WHAT WE FOUND**

CMS's reliance on the health department's certification surveys could not ensure the quality of hospice care that Servicios provided to Medicare beneficiaries. Specifically, we found that Servicios did not always meet certain Federal and Commonwealth requirements for professional licensing and certification, criminal background checks, health certificates, and training. Of the 170 workers included in our review, 130 workers' personnel records did not contain documentation to support compliance with 1 or more Federal and Commonwealth requirements. In addition, Servicios did not have any personnel records for five workers who provided direct care to Medicare beneficiaries. The health department's most recent certification survey did not find any of the types of deficiencies identified in this report; therefore, CMS's reliance on health department surveys could not ensure quality of care and that adequate protection was provided to Medicare beneficiaries.

## **WHAT WE RECOMMEND**

To improve protection provided to Medicare hospice beneficiaries, we recommend that CMS work with the health department to ensure that Servicios meets all Federal and Commonwealth requirements for professional licensing and certification, criminal background checks, health certificates, and training.

## **HEALTH DEPARTMENT COMMENTS**

In written comments on our draft report, the health department did not address our findings. However, it stated that its surveyors review a sample of hospices' personnel files to evaluate compliance with Federal and Commonwealth laws for professional licensing and certification, criminal background checks, health certificates, and training, per CMS requirements. The health department also stated that it received Federal funding to develop and implement policies and procedures for performing background checks on prospective direct care workers in long-term-care settings, which include hospices. The health department attached to its comments a September 2014 report that details the steps it is taking to ensure compliance with Federal and Commonwealth background check requirements.

## **CMS COMMENTS**

In written comments on our draft report, CMS concurred with our recommendation.

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## **INTRODUCTION**

### **WHY WE DID THIS REVIEW**

Hospice care is a program of palliative care that provides for the physical, emotional, and spiritual care needs of a terminally ill patient and his or her family. Hospices must comply with Federal and State requirements to ensure that hospice care is furnished by qualified workers.<sup>1</sup> Prior Office of Inspector General (OIG) reviews of personal care services found that services were provided by personnel who did not meet State requirements. OIG is performing reviews in various States to determine whether similar vulnerabilities exist at hospices.

### **OBJECTIVE**

Our objective was to determine whether the Centers for Medicare & Medicaid Services' (CMS) reliance on the Puerto Rico Department of Health's (health department) certification surveys of Servicios Suplementarios de Salud, Inc. (Servicios), ensured quality of care and that adequate protection was provided to Medicare beneficiaries.

### **BACKGROUND**

#### **The Medicare Hospice Benefit**

Title XVIII of the Social Security Act (the Act) established the Medicare program, which provides health insurance coverage to people aged 65 and over, people with disabilities, and people with end-stage renal disease. CMS administers the Medicare program. Medicare Part A, also known as Hospital Insurance, covers hospice services provided to eligible beneficiaries (section 1812(a)(4) of the Act).

A hospice is a public agency, private organization, or a subdivision of either that is primarily engaged in providing care to terminally ill individuals. An individual is considered to be terminally ill if the individual has a medical prognosis that his or her life expectancy is 6 months or less if the illness runs its normal course. Hospice care can be provided to individuals in a home, hospital, nursing home, or hospice facility. Hospice services include, but are not limited to, nursing care, home health aide services, physical therapy, social worker services, and spiritual care.

#### **Federal and Commonwealth Requirements for Hospices and Hospice Workers**

The Act includes requirements that are intended, in part, to ensure the quality of care provided to Medicare beneficiaries in hospices. Federal regulations require hospices to comply with all Federal, State, and local laws and regulations related to the health and safety of patients (42 CFR § 418.116). Medicare providers must also ensure that services are of a quality that meets professionally recognized standards of health care (42 CFR § 1004.10(b)). In addition, hospices must maintain the records necessary to administer the program (42 CFR § 418.310).

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<sup>1</sup> For purpose of this review, the term "workers" refers to hospice employees, contractors, and volunteers.

Federal regulations set forth standards related to professional licensing, criminal background checks, and training that all hospices must ensure their workers comply with (42 CFR §§ 418.114(a) and (d) and 418.100(g)).

The Laws of Puerto Rico Annotated (LPRAs) also describe qualifications that health care personnel must meet. Among other requirements, hospice workers must:

- meet professional licensing and certification requirements (Title 20 of LPRAs and 24 LPRAs §§ 2302(a) and 3009),
- undergo a criminal background check (8 LPRAs §§ 482(a) and 483(a) and (b)), and
- obtain a certificate of health annually (24 LPRAs § 332a(i)).

### **Certification Surveys of Hospices in Puerto Rico**

In Puerto Rico, CMS contracts with the health department to conduct certification surveys of hospices. These surveys determine whether hospices meet Medicare health, safety, and program standards, as well as Federal and Commonwealth requirements related to personnel qualifications.<sup>2</sup>

### **Servicios Suplementarios de Salud, Inc.**

Servicios provides hospice services to Medicare beneficiaries residing in nine regional areas throughout Puerto Rico. For the period July 1, 2008, through June 30, 2010, Servicios received Medicare reimbursement totaling \$14,485,126 for hospice services provided by 170 workers (152 health care professionals and 18 volunteers). As of April 3, 2014, the health department's last certification survey of Servicios was conducted in March 2007.

### **HOW WE CONDUCTED THIS REVIEW**

We limited our review to the 170 Servicios workers who provided direct care to Medicare beneficiaries during the period July 1, 2008, through June 30, 2010.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix A contains the details of our audit scope and methodology.

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<sup>2</sup> Although CMS does not have a legislative or regulatory standard for the frequency of hospice certification surveys, the health department conducts certification surveys of hospices in Puerto Rico approximately every 6 years.

## FINDINGS

CMS's reliance on the health department's certification surveys could not ensure the quality of hospice care that Servicios provided to Medicare beneficiaries. Specifically, we found that Servicios did not meet certain Federal and Commonwealth requirements for professional licensing and certification, criminal background checks, health certificates, and training. Of the 170 workers included in our review, 130 workers' personnel records did not contain documentation to support compliance with 1 or more Federal and Commonwealth requirements. In addition, Servicios did not have any personnel records for five workers who provided direct care to Medicare beneficiaries.

Of the 130 workers for whom Servicios' personnel records were deficient, 52 were deficient for more than 1 reason. Specifically, Servicios' records did not contain documentation to support that:

- 13 workers were licensed or had recertified their professional licenses,
- 4 workers complied with drug prescribing certification requirements,
- 36 workers underwent criminal background checks within 3 months of the date of their employment,
- 111 workers had obtained annual health certificates, and
- 33 workers met training requirements.

At the time of our fieldwork, the health department's most recent certification survey of Servicios had not disclosed any of these types of deficiencies.

Appendix B contains a summary of the deficiencies that we identified.

### NO PERSONNEL RECORDS

Servicios did not maintain personnel records for five workers (one practical nurse and four volunteers) who provided hospice services to Medicare beneficiaries. Consequently, for these five workers, we had no assurance that the required personnel qualifications were met. Hospices must maintain the records necessary to administer the program (42 CFR § 418.310).

### PROFESSIONAL LICENSING AND CERTIFICATION REQUIREMENTS NOT MET

All professionals who furnish services for a hospice must be legally authorized (licensed, certified, or registered) in accordance with applicable Federal and Commonwealth laws (42 CFR § 418.114(a)).

## **Hospice Workers Were Not Licensed or Had Not Recertified Their Licenses**

For 13 workers, Servicios' records did not contain documentation to support that the workers met licensing or certification requirements. A review of licensing board data for each of these 13 workers confirmed that they were not licensed or certified during our audit period. Specifically, three workers (two practical nurses and one pharmacy technician) were not licensed in accordance with Commonwealth requirements. In addition, 10 other workers (8 practical nurses and 2 registered nurses) had not recertified their licenses within the required 3 years. In Puerto Rico, health care professionals<sup>3</sup> are required to obtain a license from the health department before being authorized to practice their profession and must recertify their professional licenses every 3 years (Title 20 of LPRC and 24 LPRC 3009). An individual who does not meet licensing and recertification requirements is not qualified and therefore not authorized to provide health care services.

## **Physicians Had Not Obtained Annual Certification To Prescribe Controlled Substances**

For four workers (physicians), Servicios' records did not contain documentation that they had obtained an annual registration certification to prescribe controlled substances. For one of these physicians, there was no evidence that the required certification was obtained for almost 2 years. Any person who dispenses controlled substances in Puerto Rico must obtain an annual registration certification from the health department (24 LPRC § 2302(a)).<sup>4</sup>

## **CRIMINAL BACKGROUND CHECKS NOT CONDUCTED TIMELY**

Hospices are required to obtain criminal background checks on all personnel who have direct patient contact or access to patient records (42 CFR § 418.114(d)(1)).<sup>5</sup> This requirement applies to all current paid employees, volunteers, and contracted employees, as well as any new employees.<sup>6</sup> The health department can suspend or revoke the certification, license, or operating permit of health care providers who do not document the certification attesting that workers have not been convicted of any violent crime, aggravated assault, negligent injury, theft, child abuse and pornography, or certain other crimes (8 LPRC §§ 482(a) and 483(a) and (b)).

For 36 workers (27 health care professionals and 9 volunteers), Servicios' records did not contain documentation that it had performed a timely criminal background check. For eight of these workers (five professionals and three volunteers), there was no documentation that

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<sup>3</sup> Health service professions are defined as those directly related to the rendering of professional health services such as physicians, pharmacists, nutritionists, nurses, physical and occupational therapists, social workers, and speech therapists (24 LPRC § 3003(l)).

<sup>4</sup> The term "dispense" is defined as the prescribing, administering, or delivering of a controlled substance to an ultimate user by prescription or order (24 LPRC § 2102(11)).

<sup>5</sup> In the absence of State requirements, criminal background checks must be obtained within 3 months of the date of employment (42 CFR § 418.114(d)(2)).

<sup>6</sup> 73 Fed. Reg. 32088, 32161 (June 5, 2008).

Servicios had performed a criminal background check during the worker's entire term of employment or volunteer work. Information obtained from the Puerto Rico Department of Justice's Criminal Justice Information System disclosed that six workers had previous criminal histories.

### **NO ANNUAL HEALTH CERTIFICATES**

For 111 workers (106 health care professionals and 5 volunteers), Servicios' records did not contain health certificates to show that these workers underwent an annual health assessment. Health care facilities in Puerto Rico, which include hospices, must obtain a health certificate from all of their health care personnel annually. The health certificates must be issued by a licensed physician upon the completion of a thorough physical examination (24 LPRA § 332a(i)). A copy of the certificate should be maintained in the worker's personnel records.<sup>7</sup>

### **TRAINING REQUIREMENTS NOT MET**

For 33 workers, Servicios' records did not contain evidence that the workers completed an orientation program. Hospices are required to provide an orientation about the hospice philosophy to all employees and contracted personnel who have patient and family contact, as well as an initial orientation that addresses the employee's specific job duties (42 CFR § 418.100(g)).

### **CMS'S RELIANCE ON CERTIFICATION SURVEYS COULD NOT ENSURE THE QUALITY OF CARE PROVIDED TO MEDICARE BENEFICIARIES**

CMS relied on the health department's certification surveys of Servicios. However, we found that Servicios did not always meet certain Federal and Commonwealth requirements for professional licensing and certification, criminal background checks, health certificates, and training. The March 2007 health department certification survey did not find any of the types of issues identified in this report; therefore, CMS's reliance on health department surveys could not ensure quality of care and that adequate protection was provided to Medicare beneficiaries. Because Servicios did not ensure that its workers met professional licensing and certification, criminal background check, health certificate, and training requirements, it could not adequately ensure the health and safety of Medicare beneficiaries.

### **RECOMMENDATION**

To improve protection provided to Medicare hospice beneficiaries, we recommend that CMS work with the health department to ensure that Servicios meets all Federal and Commonwealth requirements for professional licensing and certification, criminal background checks, health certificates, and training.

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<sup>7</sup> Health department's Regulation No. 6044, *General Performance and Operation of Health Care Facilities in Puerto Rico*, Chapter II, Article A, § 1(g) and Chapter V, Article F § 11.

## **HEALTH DEPARTMENT COMMENTS**

In written comments on our draft report, the health department did not address our findings. However, it stated that its surveyors review a sample of hospices' personnel files to evaluate compliance with Federal and Commonwealth laws for professional licensing and certification, criminal background checks, health certificates, and training, per CMS requirements. The health department also stated that it received Federal funding to develop and implement policies and procedures for performing background checks on prospective direct care workers in long-term-care settings, which include hospices. The health department attached to its comments a September 2014 report that details the steps it is taking to ensure compliance with Federal and Commonwealth background check requirements.

The health department's comments are included as Appendix C.<sup>8</sup>

## **CMS COMMENTS**

In written comments on our draft report, CMS concurred with our recommendation. CMS's comments are included in their entirety as Appendix D.

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<sup>8</sup> We did not include the report attached to the health department's comments because it contains sensitive information.

## **APPENDIX A: AUDIT SCOPE AND METHODOLOGY**

### **SCOPE**

Our review covered the 170 Servicios workers who provided direct care during the period July 1, 2008, through June 30, 2010.

We did not review Servicios' overall internal control structure. Rather, we limited our review of internal controls to those applicable to our objective.

We performed fieldwork at the health department's offices in Bayamón and San Juan, Puerto Rico, and at Servicios' central office in San Juan, Puerto Rico.

### **METHODOLOGY**

To accomplish our objective, we:

- reviewed applicable Federal and Commonwealth laws, regulations, and guidelines;
- met with health department officials to gain an understanding of the certification survey process;
- obtained and reviewed the health department's latest certification survey report for Servicios and supporting documentation, including Servicios' corrective action plan;
- identified 170 Servicios workers (152 health care professionals and 18 volunteers) who provided direct care to Medicare beneficiaries during the period July 1, 2008, through June 30, 2010;
- reviewed Servicios' personnel records, if any, for each of the workers to determine compliance with Federal and Commonwealth qualification requirements;
- reviewed applicable licensing board records for each of Servicios' health care professionals to determine whether they were properly licensed;
- requested information from the Puerto Rico Department of Justice's Criminal Justice Information System to determine whether any Servicios workers had previous criminal histories; and
- met with health department and Servicios officials to discuss our audit results.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

**APPENDIX B: SUMMARY OF DEFICIENCIES**

<b>Servicios Personnel</b>	<b>Total Personnel During Audit Period</b>	<b>Total Noncompliant Personnel Records</b>	<b>No Personnel Records</b>
Physician	11	9	0
Nurse	50	40	0
Practical nurse	57	40	1
Social worker	13	11	0
Nutritionist	7	7	0
Pharmacist	5	4	0
Pharmacy technician	1	1	0
Speech pathologist	1	1	0
Physical therapist	4	4	0
Assistant physical therapist	2	2	0
Occupational therapist	1	1	0
<b>Total Professionals</b>	<b>152</b>	<b>120</b>	<b>1</b>
Volunteers	18	10	4
<b>Grand Total</b>	<b>170</b>	<b>130</b>	<b>5</b>

<b>Reasons for Noncompliance With Federal and Commonwealth Qualification Requirements</b>	<b>Servicios Professionals</b>	<b>Servicios Volunteers</b>	<b>Total Number of Deficiencies</b>
No personnel records	1	4	5
Hospice workers not licensed or certified	13	N/A	13
Drug prescribing certifications not obtained	4	N/A	4
Criminal background checks not conducted timely	27	9	36
No annual health certificates	106	5	111
Training requirements not met	33	N/A	33
<b>Totals</b>	<b>184</b>	<b>18</b>	<b>202</b>

## APPENDIX C: HEALTH DEPARTMENT COMMENTS



February 10, 2015

Respond to Report Number: A-02-11-01028

James P. Edert  
Regional Inspector General  
for Audit Services  
Office of Audit Services, Region II  
Jacob K. Javits Federal Building  
26 Federal Plaza, Room 3900  
New York, NY 10278

Dear Mr. Edert:

We are including comments for the audit report *CMS's Reliance on Puerto Rico's Certification Survey Could Not Ensure the Quality of Care Provided to Medicare Hospice Beneficiaries by Servicios Suplementarios de Salud Inc. (Facility will be reference as "Servicios")*

Every fiscal year the Center for Medicare/Medicaid Services (CMS) provides to the certification State Agencies the Mission Priority Document (MPD) which states the survey frequency & priority on which each facility should be survey. As stated in this draft report "as of April 3<sup>rd</sup>, 2014, the Health Department's last certification survey of "Servicios" was conducted on March, 2007".

The MPD document states on page 75 of the Appendix 1- Table of Survey Frequency & Priority for FY12 & FY13 that Hospice should be survey on 6.5 years interval on Tier 3 and on Tier 4 on an average of 6.0 years of Non DEEM facilities, the state agency has complied with this requirement. Surveys of "Servicios" have been every 6.0 year since it first came in to the program in 1993 as required by CMS. This document was shared with the OIG Inspectors during the audit. Since the last survey on 2007 the next certification survey as per MPD would be in 2013 (6 years).

Related to compliance with Federal and Commonwealth requirements for professional licensing and certification, criminal background checks, health certificates and training, the federal surveyors takes a **sample** of credential files to evaluate compliance with federal and state laws as per CMS requirements. A 100% sample of all staff in a particular facility is not a federal requirement. The OIG sample was from July 1, 2008 through June 30, 2010, during that period a federal survey was not conducted at that facility.

P.O BOX 70184 San Juan, Puerto Rico 00936-8184 • Tel. (787) 765-2929 • [www.salud.gov.pr](http://www.salud.gov.pr)



James P. Edert  
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The Act No. 300 of September 2, 1999, known as “Criminal Record Verification Act of Care Service Providers for the Children and the Elderly of Puerto Rico” ( Ley Núm. 300 de 2 de

septiembre de 1999-“Reglamento para la Verificación de Historial Delictivo de Proveedores de Servicios de Cuidado a Niños y Personas de Edad Avanzada de Puerto Rico”)

The federal surveyors cannot enforce Commonwealth laws, however once the Act No. 300 was forward to the State Agency Medicare division by the OIG, it was share via e-mail with all hospice and home care providers and with the Association of Home Care and Hospice (“Asociación de Agencias de Servicios de Salud en el Hogar y Hospicios de Puerto Rico Inc, (AASSHH)) and the Hospice Association and included all the rest of Medicare certified facilities in Puerto Rico, and licensing division to acknowledge them of compliance once it is enforce by the Department of Health. All Home Care and Hospices started to request the sex offender’s reports for all their employees and the Criminal History. However instructions to be provided to the facilities will be forth coming when the Department of Health provides the required to process to assess compliance.

The federal surveyors uses a sheet to pick the credential sample of the facility’s staff (which was share with the OIG inspectors) this sheet was revised in 2013 and even though the Act No. 300 has not been enforce by the Department of Health the federal surveyors were requesting the facility’s compliance with the Act No. 300 and added it on the credential list requirements. In this Act No. 300 both requirements are looked, the sex offender report and the criminal history. The state and federal surveyors must wait for the instructions to be provided by the Department of Health for the evaluation of this requirement.

On the other hand, on December 2012 the Department of Health of Puerto Rico received federal funds to identify and implement the procedures and policies related to conduct background checks on prospective direct care workers in long-term care setting. Based on this the Department of Health has designed a new background check system. All the information related is contain in the document named “Puerto Rico Background Check Program Report” (September 2014) which is attached with this letter.

In the meantime the survey and certification division of Medicare will continue to request compliance with the background check as per federal requirements (minimum) until instructions and final process is received from the Department of Health of Puerto Rico.

If any questions, please do not hesitate to contact me directly at (787) 765-2929 ext. 3406

Cordially,



**ANA C. RÍUS ARMENDÁRIZ, M.D**  
Secretary of PR Department of Health

## APPENDIX D: CMS COMMENTS



DEPARTMENT OF HEALTH & HUMAN SERVICES

Centers for Medicare & Medicaid Services

200 Independence Avenue SW  
Washington, DC 20201

**To:** Daniel R. Levinson  
Inspector General  
Office of the Inspector General

**From:** Andrew M. Slavitt   
Acting Administrator  
Centers for Medicare & Medicaid Services

**Subject:** CMS's Reliance on Puerto Rico's Certification Surveys Could not Ensure the Quality of Care Provided to Medicare Hospice Beneficiaries by Servicios Suplementarios de Salud, Inc. (A-02-11-01028)

The Centers for Medicare & Medicaid Services (CMS) appreciates the opportunity to review and comment on the Office of the Inspector General's (OIG) draft report. CMS is committed to ensuring Medicare and Medicaid beneficiaries receive high quality health care.

CMS contracts with the Puerto Rico Health Department to conduct certification surveys of hospices. CMS is currently reviewing the OIG's findings and will request a complaint investigation of those findings by the Puerto Rico Health Department if indicated. If a complaint investigation is conducted on the hospice and deficient practices are identified, the hospice will be required to provide a plan of correction for all deficient practices. A failure by the hospice to make the necessary corrections and regain compliance with the Conditions of Participation could result in the termination of its Medicare provider agreement.

### OIG Recommendation

The OIG recommends that CMS work with the Puerto Rico health department to ensure that Servicios meets all Federal and Commonwealth requirements for professional licensing and certification, criminal background checks, health certificates and training.

### CMS Response

CMS concurs with this recommendation. CMS will continue to work with the Puerto Rico Health Department to reinforce the adherence to Federal and State requirements. While federal surveyors cannot enforce Commonwealth laws, CMS is supportive of Puerto Rico's own efforts to do so. CMS contracts with Puerto Rico's Department of Health to monitor compliance with all Federal and State requirements for hospice workers. The last certification survey of Servicios was conducted in March of 2007. Until the Improving Medicare Post-Acute Care Transformation (IMPACT) Act of 2014, there were no legislative or regulatory standards for the

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frequency of hospice surveys. The IMPACT Act added a statutory requirement that the interval between hospice surveys may not exceed three years.