

9-8-25 Weekly Clinical Update

There have been lots of verbalized confusion and questions about the expiration of multiple QSO letters from CMS that were issued recently. Per CMS, as “QSO letters expire as key guidance integrates into Appendix PP”. “In a major regulatory shift”, CMS officially sunset several QSO memoranda, integrating the guidance into the updated Appendix PP of the State Operations Manual. This move, effective April 28, 2025, was a “pivotal moment” for nursing home operators, surveyors, and compliance professionals” [REVISED: Revised Long-Term Care \(LTC\) Surveyor Guidance: Significant revisions to enhance quality and oversight of the LTC survey process | CMS](#).

This integration includes multiple areas:

- Admission, Transfer & Discharge protocols
- Chemical Restraints and Unnecessary Psychotropic Medication
- Resident Assessment and Care Planning
- Nursing Services and Staffing (including Payroll-Based Journal updates)
- Quality of Life and Quality of Care standards
- QAPI (Quality Assurance and Performance Improvement)
- Infection Prevention and Control, including EBP

Each of these areas now feature updated Critical Element Pathways (CEPs) and surveyor guidance, “designed to streamline compliance assessments and reduce ambiguity”. 😊

This consolidation offer both clarity and challenges for facilities. Appendix PP now serves as the single source of survey expectations, BUT, the expiration of standalone QSO letters means increased need for training, audits, and documentation requirements to align with Appendix PP including:

- Survey readiness: surveyors are now using the new CEPs & interpretive guidance
- Policy updates: policies and procedures must reflect the integrated standards, especially around admission agreements, discharge planning and processes, trauma-informed care and psychotropic stewardship
- Training requirements: orientation modules and onboarding tools should be reviewed and refreshed to incorporate the new language and expectations embedded in Appendix PP.

In order to “connect all the dots”, use your QAPI initiatives and processes to ensure incorporation of the integrated standards, linking compliance to meaningful resident outcomes. It will be worth the time and effort.