



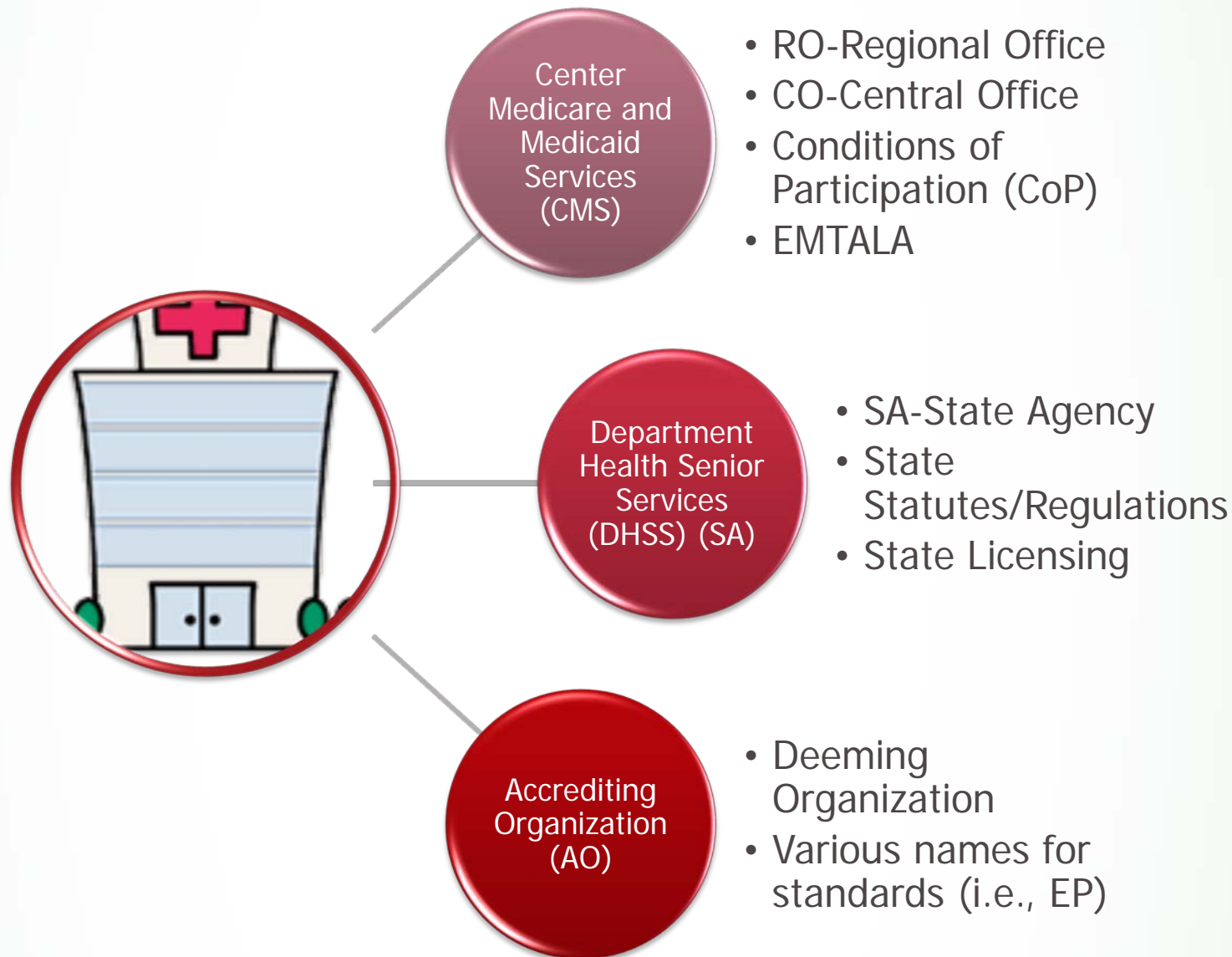
Missouri Hospital Regulations Update

Impacting CSR 19 30-20

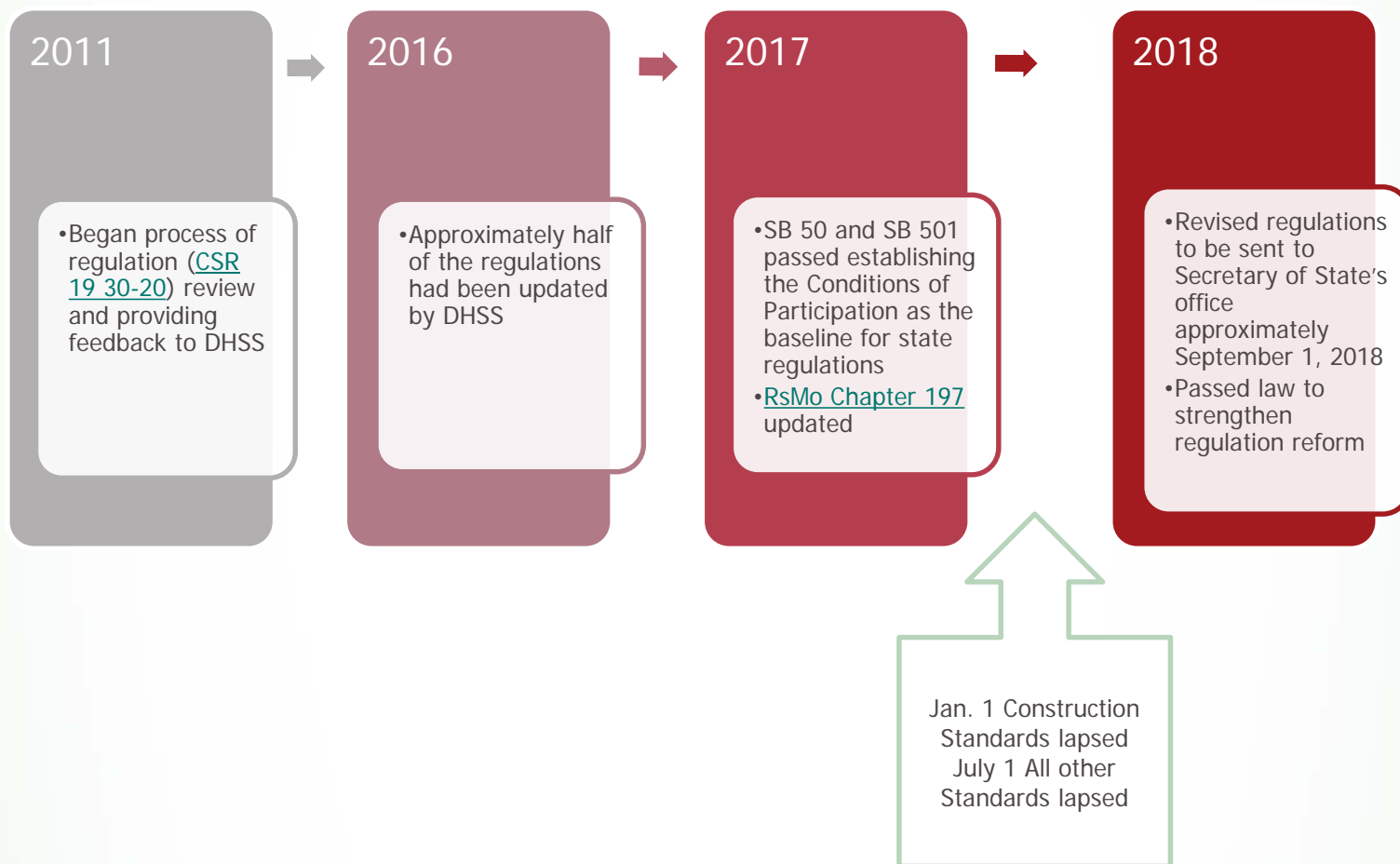
Sarah Willson, VP Regulatory and Clinical Affairs
Meghan Henderson, Associate General Counsel

Composition of 144 MHA Members

- **114** not-for-profit | **30** for-profit
 - 72 PPS acute care/MedSurg hospitals
 - 2 non-PPS “other” acute care
 - 36 critical access hospitals
 - 15 behavioral health
 - 6 long-term acute care/LTACs
 - 5 federal (veterans and army hospitals)
 - 5 rehabilitation
 - 3 free-standing children’s hospitals



Timeline



Regulatory Change



Reduces duplicative or contradictory standards

Improves consistency in survey interpretation

Leans on resources of CMS in updating to best standard

Promotes regulatory reform initiatives

Could be some difference in definition of duplicative or contradictory

Future legislative initiatives not adhering to principle

Construction Standards

- Since January 1, 2018 the Missouri Construction Standard for Hospitals has been expired.
- An emergency rule request has been submitted by DHSS for the formal adoption of the 2010/2014 FGI Guidelines and 2012 NFPA 101, Life Safety Code.
- Between now and the formal adoption of the rules, a project can decide whether they will follow the state's old CSR requirements or whether compliance with the 2010/2014 Edition FGI Guidelines is desired.

Other Standards

- Lapsed July 1, 2018
- DHSS is not currently issuing tags for state standards which are duplicative or contradictory to the Conditions of Participation.
- 19 CSR 30-20.015 Administration of the Hospital Licensing Program is slated to have biggest changes slowing the process.
- While not statutorily driven, state regulations for Psychiatric Hospitals and Rehabilitative Hospitals will follow appropriate Conditions of Participation.

Recommended to keep...

- 19 CSR 30-20.011 Definitions Relating to Hospitals
- 19 CSR 30-20.015 Administration of the Hospital Licensing Program (variance requests and nursing services)
- 19 CSR 30-20.030 Construction Standards for New Hospital
- 19 CSR 30-20.040 Definitions Relating to Long-Term Care Units in Hospitals
- 19 CSR 30-20.050 Standards for the Operation of Long-Term Care Units in Hospitals
- 19 CSR 30-20.070 Registration as a Hospital Infectious Waste Generator
- 19 CSR 30-20.100 Pharmacy Services and Medication Management in Hospitals
- 19 CSR 30-20.114 Environmental Waste Management and Support Services
- 19 CSR 30-20.125 Unlicensed Assistive Personnel Training Program

Hospitals will have opportunity to review and make comment on proposed final rules

Timeline for Publishing Administrative Rules



2018 Legislation Impacting Regulations

- [HB 2183](#), [SB 951](#), [HB 1246](#)
- Streamlining hospital licensure rules by changing state law to allow Medicare Conditions of Participation to be incorporated by reference. Effective August 28.
- New definition of hospital premises to encompass property that is “catty-corner” across an intersection from main hospital property. Effective August 28.
- Requires posting of sign regarding human trafficking in various locations, including emergency departments (HB 1246). Must be in compliance by March 1, 2019.

How do you impact future legislation?

- Asking the “why”
- Reporting perceived as duplication of efforts, difficulty in workflow, unnecessary regulations to MHA via our Streamlining Government initiative by emailing [Ted Wedel](#) or [Daniel Landon](#)
- Reading MHA Today posts and special requests to contact legislators on specific issues
- As a health care provider, consider being on boards or running for office where your unique skills and knowledge can be instrumental.

State Resources

- Missouri Code of State Regulations: [Title 19](#)
- Missouri Code of State Regulations: [Chapter 20](#)
- DHSS' Bureau of Hospital Standards: 573/751-6303
- DHSS' Bureau of Hospital Standards Contact Information:
 - Richard Grindstaff, Bureau Chief
Richard.Grindstaff@health.mo.gov
 - Kathie Thomas, Assistant Bureau Chief
Kathie.Thomas@health.mo.gov
 - Melodie Brumback, Assistant Bureau Chief
Melodie.Brumback@health.mo.gov
 - Complaint Hotline: 800/392-0210
 - General Email: HSRElectronic2567@health.mo.gov

MHA Regulatory Resources

MHA Staff 573/893-3700

- Sarah Willson, VP, Clinical and Regulatory Affairs
ext. 1304, swillson@mhanet.com
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MHA Resources

- Self Assessment Checklists - [Acute](#), [CAH](#)
- [Survey and Certification Manual](#)
- [Signage Requirements](#)
- [Quality/Regulatory Orientation Guide](#)
- [Inside Track Publications](#)
- [MHI Offerings](#)
- [A Patient's Guide to Observation Care](#)

Questions?

Thank you!