

A discussion about **Scope/Severity** inevitably comes up...someone will ask and others should ask to fully understand what it means.

There are 3 levels of scope (horizontal) and 4 levels of severity (vertical)... and if you think of them in a matrix, it might help understand them together.

Immediate Jeopardy	J	K	L
Actual Harm	G	H	I
Potential	D	E	F
Minimum Potential	A	B	C
	Isolated	Pattern	Widespread

If, for instance, you are looking at a Scope/Severity of "H" you would know it was at the level of "Actual Harm" with a "pattern" scope.

Here are some more definitions to go with these, starting on the bottom of the severity ladder and going up:

Level 1 Severity – (Minimum Potential) – No actual Harm has occurred and has the potential for no more than minimum harm. Considered to be "Substantial Compliance"

Level 2 Severity – (Potential) – Non-compliance that results in no more than minimal physical, mental and/or psychosocial discomfort to the resident and/or has the potential (not yet realized) to compromise the resident's ability to maintain and/or reach his/her highest practicable physical, mental and/or psychological well-being as defined by an accurate and comprehensive resident assessment, plan of care, and provision of services.

Level 3 Severity – (Actual Harm) – Noncompliance that results in a negative outcome that has compromised the resident's ability to maintain and/or reach his/her highest practicable physical, mental and psychosocial well-being as defined by an accurate and comprehensive resident assessment, plan of care, and provision of services. This does not include a deficient practice that only could or has caused limited consequences to the resident.

Level 4 Severity (Immediate Jeopardy, or IJ) – Immediate Jeopardy, a situation in which immediate corrective action is necessary because the facility's noncompliance with one or more requirements of participation has cause, or is likely to cause, serious injury, harm, impairment, or death to a resident receiving care in the facility.

Scope (on the horizontal axis)...

Isolated – Scope is isolated when one or very limited number of residents are affected and/or one or a very limited number of staff are involved, and or the situation has occurred only occasionally or in a very limited number of occasions.

Pattern – Scope is a pattern when more than a very limited number of residents are affected, and/or more than a very limited number of staff are involved, and or the same resident(s) have been affected by repeated occurrences of the same deficient practice. The effect of the deficient practice is found not to be pervasive throughout the facility.

Widespread – Scope is widespread when the problems causing the deficiencies are pervasive in the facility and/or affect a large portion or all of the facility's residents. Widespread scope refers to the entire facility population, not a subset of residents or one unit of a facility. In addition, widespread scope may be identified if a systemic failure (e.g., failure to maintain food at safe temperatures) would be likely to affect a large number of residents and is, therefore, pervasive in the facility.

Hope you find this helpful and educational. The letter tells you both the scope AND severity using this matrix. Following is a more official "view" of it.

	(J)	PoC		(K)	PoC		(L)	PoC	
Immediate Jeopardy to Resident Health or Safety	Required: Cat. 3 Optional: Cat. 1 Optional: Cat. 2			Required: Cat. 3 Optional: Cat. 1 Optional: Cat. 2			Required: Cat. 3 Optional: Cat. 2 Optional: Cat. 1		
	(G)	PoC		(H)	PoC		(I)	PoC	
Actual Harm that is not Immediate Jeopardy	Required* Cat. 2 Optional: Cat. 1			Required* Cat. 2 Optional: Cat. 1			Required* Cat. 2 Optional: Cat. 1 Optional: Temporary Mgmt.		
	(D)	PoC		(E)	PoC		(F)	PoC	
No Actual Harm with Potential for More than Minimal Harm that is not Immediate Jeopardy	Required* Cat. 1 Optional: Cat. 2			Required* Cat. 1 Optional: Cat. 2			Required* Cat. 2 Optional: Cat. 1		
No Actual Harm with Potential for Minimal Harm	(A)	No Remedies Commitment to Correct Not on HCFA -2567		(B)	PoC		(C)	PoC	
	Isolated			Pattern			Widespread		

Substandard quality of care is any deficiency in 42 CFR 483.13, Resident Behavior and Facility Practices, 42 CFR 483.15, Quality of Life, or 42 CFR 483.25, Quality of Care, that constitutes immediate jeopardy to resident health or safety; or, a pattern of or widespread actual harm that is not immediate jeopardy; or, a widespread potential for more than minimal harm that is not immediate jeopardy, with no actual harm.

Substantial Compliance

REMEDY CATEGORIES

Category 1 (Cat. 1)

Directed Plan of Correction
State Monitor; and/or
Directed In-Service Training

Category 2 (Cat. 2)

Denial of Payment for New Admissions; Denial of Payment for All Individuals; imposed by HCFA; and/or Civil Money Penalties:
\$50 - \$3,000/day
\$1,000 - \$10,000/instance

Category 3 (Cat. 3)

Temporary Management
Termination

Optional

Civil Money Penalties
\$3,050 - \$10,000/day
\$1,000 - \$10,000/instance

Denial of payment for new admissions must be imposed when a facility is not in substantial compliance within three months after being found out of compliance.

Denial of payment and State monitoring must be imposed when a facility has been found to have provided substandard quality of care on three consecutive standard surveys.

Note: Termination may be imposed by the state or HCFA at any time when appropriate.

**This is required only when decision is made to impose alternate remedies instead of or in addition to termination.*