



**Date:** September 22, 2023  
**To:** NDAC Accredited Locations  
**From:** NDAC Regulatory and Compliance Department  
**Re:** CMS to Resume Onsite Direct Observation Validation Surveys

CMS Center for Clinical Standards and Quality/ Quality, Safety & Oversight Group released a memorandum dated September 6, 2023 notifying all State Agencies and Accreditation Organizations (AOs) that they are resuming validation surveys. These surveys had been paused during the COVID -19 Public Health Emergency and are now scheduled to resume beginning in October 2023.

Validation surveys are the mechanism by which CMS ensures that AOs are accurately surveying their accredited locations within the parameters of Medicare requirements. CMS has engaged third-party contract surveyors to perform these validation surveys. These third-party surveyors who are contracted by CMS will be present during randomly chosen AO accreditation surveys to directly observe and evaluate the ability of AO surveyors to assess compliance with the Medicare conditions of coverage.

### **Process**

CMS will use a random sample to select reaccreditation surveys for validation. The third-party surveyors contracted by CMS will accompany the NDAC surveyor for the validation survey.

- The NDAC surveyor and the contracted surveyor will enter the facility (unannounced) at the same time and NDAC will lead and conduct the survey per its normal process.
- The CMS contracted surveyor will directly observe and evaluate the NDAC surveyor.
- Contract surveyors will exit the survey with the NDAC surveyor.

**The CMS contracted surveyors are not there to survey the facility, but to only evaluate the NDAC surveyor.**

If you have any questions, please contact NDAC at [info@ndacommission.com](mailto:info@ndacommission.com).

Sincerely,

Curt Anliker, CEO

National Dialysis Accreditation Commission