June 4, 2018

Q: Has IDPH recently made some changes to their T18/T19 certification enforcement letters?

A: In discussing with IDPH, the answer is yes. IDPH has made two significant changes to their T18/T19 federal enforcement letters. The first change they made was to stop including a recommended fine amount in the letter. CMS has instructed IDPH to remove the recommended fine amount and the fine amount will be determined by federal CMS and the facility will be notified of the fine amount in the federal CMS enforcement letter. The second change that CMS instructed IDPH to make was with regard to the discretionary Denial of Payment for New Admissions (DOPNA) dates. CMS instructed IDPH to review the seriousness of the violations and depending on that review, they (IDPH) have discretion to make the discretionary DOPNA date earlier.