

Basic Writing Skills for Survey Staff

Welcome

The Basic Writing Skills for Survey Staff (BWS) course is a review course in the surveyor curriculum. It is designed to provide an opportunity for surveyors to review proper writing techniques and practice application of those skills while documenting statements that can be used in citations.

The course is beneficial for new surveyors to complete during their State Survey Agency (SA) orientation, as well as for experienced surveyors to review on an annual or as needed basis.

Course Syllabus

Refer to the [Basic Writing Skills for Survey Staff Course Syllabus](#) for the specific course requirements.

Course Structure

In order to successfully complete this course, learners must complete all of the required components and pass the course Post-Test with a minimum score of 85 percent.

Required components include:

- Course Pre-Test
- Module 1
- Course Post-Test
- Course Evaluation

Learners scoring 85 percent or higher on the Pre-Test may opt out of the course.

Learners not scoring 85 percent or higher are required to complete the course.

Course Completion

In order to successfully complete this course, you must complete Module 1 and pass the course Post-Test with a minimum score of 85 percent.

If you score less than 85 percent on the first attempt, you may retake the Post-Test up to two more times.

After completing the Post-Test, you must complete the course evaluation form.

Required Software

There are several browser plug-ins that you will need for this course:

[Adobe Acrobat Reader](#)

[Microsoft Word Viewer](#) (if you do not have Microsoft Word installed)

Documents

Document links are typically in Portable Document Format (PDF) and include regulations, articles, and State Operations Manual (SOM) appendices.

[Findings](#)

Selecting this link will open a PDF document to enhance your knowledge of the content.

Glossary

The Glossary document contains definitions for frequently used acronyms, terms, and phrases within the course.

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Accessibility

Every attempt has been made to make this course material accessible for the disabled. With that in mind, here are several resources to accommodate particular disabilities.

For Hearing Disabilities:

All course files that contain audio are also accompanied by Closed Captioning or another text alternative.

For Visual or Mobility Disabilities:

The course files are HTML5-based. For disabilities that require a screen reader, we have created a duplicate of the entire course in a PDF that works well with screen readers.

Next Step

The next step is to complete the course Pre-Test.

Resources

On this page, you will find information about resources referenced in the course. Links to web sites will open in a new browser window. To exit the Resources document and return to the course, simply close the tab on your browser window.

Appendix A—State Operations Manual (SOM) Survey Protocol, Regulations and Interpretive Guidelines for Hospitals

http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_a_hospitals.pdf

Appendix Q, State Operations Manual, Guidelines for Determining Immediate Jeopardy

http://cms.gov/manuals/Downloads/som107ap_q_immedjeopardy.pdf

Exhibit 7A, Principles of Documentation

http://www.cms.gov/manuals/downloads/som107_exhibit_007a.pdf

Exhibits Table of Contents, Medicare State Operations Manual, Chapter 9

http://www.cms.gov/manuals/downloads/som107c09_exhibitstoc.pdf

State Operations Manual (SOM) 100-07

<http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Internet-Only-Manuals-IOMs-Items/CMS1201984.html>

State Operations Manual Chapter 5 – Complaint Procedures

<http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/som107c05.pdf>

Statement of Deficiencies and Plan of Correction, Form CMS-2567

<http://www.cms.gov/Medicare/CMS-Forms/CMS-Forms/Downloads/CMS2567.pdf>

Medicare State Operations Manual (SOM) Appendix

http://www.cms.gov/manuals/downloads/som107_Appendixtoc.pdf

Survey & Certification – General Information

<http://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/index.html>

Surveyor Notes Worksheet, CMS-807

<http://www.cms.gov/Medicare/CMS-Forms/CMS-Forms/Downloads/CMS807.pdf>

Glossary

The following terms are used in the *Basic Writing Skills for Survey Staff* course. You can access the Department of Health & Human Services (DHHS) Centers for Medicare & Medicaid Services (CMS) website to [view the definitions of common acronyms](#).

A

Acronym	An abbreviation formed from initial letters.
Action Verbs	A verb that expresses action.
Active Voice	One of the two “voices” (see also passive voice) of verbs. When the verb of a sentence is in active voice, the subject is doing the acting.
APOD	Advanced Principles of Documentation

B

C

Centers for Medicare & Medicaid Services	A Federal agency within the Department of Health & Human Services (DHHS) that administers the Federal Medicare program and works in partnership with state governments to administer Medicaid.
CfC	Condition for Coverage
CFR	Code of Federal Regulations
CLIA	Clinical Laboratory Improvement Amendments
CMS	Centers for Medicare & Medicaid Services
Coach	Someone who helps someone else (a new surveyor) learn something that he or she would not have learned very well, learned slowly, or not at all if left alone.
Code of Federal Regulations	This is a codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal government. It is divided into 50 titles that represent broad areas subject to Federal regulation.
Conditions for Coverage	CMS develops Conditions for Coverage (CfC) that health care organizations must meet in order to begin and continue participating in the Medicare and Medicaid programs. These health and safety standards are the foundation for improving quality and protecting the health and safety of beneficiaries.
Conditions of Participation	Minimum health and safety standards that providers and suppliers must meet in order to be Medicare and Medicaid-certified and receive Medicare reimbursement.

CoP Condition of Participation

D

Data Tag A component of the State Operations Manual (SOM) Quality Review checklist that verifies the tag contains a Code of Federal Regulations (CFR)/Life Safety Code (LSC)/Clinical Laboratory Improvement Amendments (CLIA) requirement and a statement that the requirement is “Not Met.”

Deficient This is a term used for not having enough of something that is important or necessary; not good enough; or not as good as others.

Deficiency Citation A deficiency citation consists of (A) a regulatory reference, (B) a deficient practice statement, and (C) relevant findings.

Deficient Practice Statement The statement of deficient practice is one component of the evidence. It includes: 1. The specific action(s), error(s), or lack of action (deficient practice); 2. Outcome(s) relative to the deficient practice, when possible; 3. A description of the extent of the deficient practice or the number of deficient cases relative to the total number of such cases; 4. The identifier of the individuals or situations referenced in the extent of the deficient practice; and 5. The source(s) of the information through which the evidence was obtained.

DPS Deficient Practice Statement

E

e-CFR Electronic Code of Federal Regulations

Evidence Something that furnishes proof or as testimony; something legally submitted to a tribunal to ascertain the truth of a matter.

F

Facility This is something, such as a hospital, that is built, installed, or established to serve a particular designated purpose.

Fact A known occurrence; something known to exist or have happened.

Findings Facts that support or illustrate an entity’s noncompliance with a requirement.

Form CMS-2567 This form is titled Statement of Deficiencies and Plan of Correction. It is the record of the survey wherein the survey team documents and justifies its determination of compliance and informs the provider or supplier of its state of compliance with the requirements for participation in Federal programs.

G

Generality	General information followed by specific details.
H	
Homonyms	Words that are spelled and pronounced like one another but are different in meaning.
I	
Identifiers	Names that identify a unique object, class of objects, or persons.
Inference	A conclusion or opinion that is formed because of known facts or evidence.
J	
Jargon	Technical terminology or characteristic idiom of a special activity or group.
K	
L	
LSC	Life Safety Code
M	
N	
O	
Outcome	This is a result of performance (or nonperformance) of a function or process and is one of three categories of Federal requirements for CMS participation or coverage.
P	
Passive Voice	One of the two “voices” (see also active voice) of verbs. When the verb of a sentence is in passive voice, the subject does not act, but is the object or receiver of the action.
Plain language	Writing in a clear, concise manner to improve reader comprehension and surveyor credibility.
Plan of Correction	One column in Form CMS-2567 for statements reflecting the facility’s plan to correct the deficiencies cited and the anticipated time of correction.
POC	Plan of Correction
POD	Principles of Documentation
P&P	Policy and Procedure

Process This will outline a goal-directed, interrelated series of actions, events, mechanisms, or steps and is one of three categories of Federal requirements for CMS participation or coverage.

Q

Quality review A systematic review of a deficiency citation to ensure it is understandable, defensible, and includes the required components.

R

Redundancy Excessive wordiness or needless repetition of words, phrases, or ideas.

Regional Offices CMS has ten Regional Offices (RO) located throughout the United States that are responsible for assuring that health care providers and suppliers participating in the Medicare, Medicaid, and Clinical Laboratory Improvement Amendment (CLIA) programs meet applicable Federal requirements.

Regulation A law, rule, or other order prescribed by authority, especially to regulate conduct.

Regulatory reference Includes the following components: 1. A survey data tag number; 2. The CFR or LSC reference; 3. The language from that reference which specifies the aspect(s) of the requirement with which the entity was noncompliant; and 4. An explicit statement that the requirement was "NOT MET."

Relevant Facts or observations that tend to prove or disprove the subject at hand or that relate to a subject in an appropriate way.

RO Regional Office

S

Slang Commonly known as informal, nonstandard vocabulary composed typically of coinages, arbitrarily changed words, and extravagant, forced, or facetious figures of speech.

SOD Statement of Deficiencies

SOM State Operations Manual

State Operation Manual The regulatory authority for the state performance standards and protocols.

Structure One of three categories of Federal requirements for CMS participation or coverage and pertains to specific initial conditions required for a facility.

T

Tags

A means to organize the components of the Conditions of Participation (CoPs) regulatory text in the Automated Survey Processing Environment (ASPEN), which supports the generation of survey reports. CMS breaks each hospital CoP into one condition-level tag and multiple standard-level tags. The number of standard-level tags does not usually correspond to the number of standards under a condition in 42 CFR Part 482. Generally, CMS breaks the regulatory standards down further into their separate and distinct requirements and assigns a tag number to each.

U

V

W

X

Y

Z

Basic Writing Skills for Survey Staff: Module 1

Welcome to Basic Writing Skills for Survey Staff

Have you ever been so busy that you don't have time to proofread and written something like this?

"Their practicing there grammar over their."

When writing it is important to follow good writing principles. You should adhere to grammar and punctuation rules and also check for spelling errors.

Writing in a clear, concise manner and in active voice is a necessity in order to present a clear picture to your reader of the sequence of events.

Using plain language helps reader comprehension and improves surveyor credibility.

The information in this module provides a review of these principles and rules and gives you opportunities to practice using them.

Objectives

After completing this module, you will be able to:

- Describe three methods of organizing documentation.
- Identify the difference between active voice and passive voice.
- Select appropriate punctuation, grammar, and spelling for sample sentences.

Module Overview

This module includes the following topics:

- Best writing practices
- Organizing the documentation
- Active voice
- Common grammar, punctuation, and spelling errors

Best Practices

These six tips will assist you when writing clear, accurate, and concise documentation. You will recognize most of these from the Basic Principles of Documentation (POD) course.

1. Choose simple descriptions.
2. Avoid using slang or professional jargon.
3. Minimize abbreviations.
4. Whenever possible, write in simple present tense.
5. Choose action verbs.
6. Be concise.

Let's take a quick look at each of these.

#1 Choose Simple Descriptions

Choose simple descriptions to prevent misunderstanding. Why are simple descriptions useful?

- Your audience may come from various fields such as medical, legal, administrative, and technical.
 - For example, “The facility must be offered the opportunity to request an IDR.” is better stated as, “The facility must be offered a form to request an informal dispute resolution.”
- Public or lay readers may not be familiar with terminology that other professionals use or may attach different meanings to words.

#2 Avoid Using Slang or Professional Jargon

Use the most precise terms possible.

For example, “The patient was NPO before surgery.” is better stated as, “The patient was not allowed to have anything by mouth before surgery.”

#3 Minimize Abbreviations

Use abbreviations only when they are convenient for your reader, not because they are shorter and easier to write.

Identify the term and its abbreviation or acronym the first time it is used (e.g., Certificate of Competency (CoC)).

Remember, the more abbreviations you use, the harder it is for the public to understand what you are writing.

#4 Whenever Possible, Write in Simple Present Tense

Present tense simplifies sentences and keeps readers focused on the action in the moment.

Simple present tense also makes instructions clear, complete, and unambiguous. It expresses the idea that an action is repeated or unusual.

Example #1

Provide a Plan of Correction

Example #2

When does this course begin?

Example #3

We always review the medical records.

Although best practice is to use simple present tense, Form CMS-2567 is written in past tense since it contains documentation of events that happened in the past.

#5 Choose Action Verbs

Action verbs tell us what the subject of our clause or sentence is doing. Review these phrases to see examples of simplified verb usage.

- Conduct a survey → survey
- Have a dialogue → talk
- Make a choice → choose
- Comes to a conclusion → concludes

#6 Be Concise

Here are a few techniques for identifying and eliminating unnecessary phrases.

- Put the main idea first.
- Emphasize the action.
- Remove unnecessary or redundant words or phrases (e.g., “if” vs. “in the event of”; “the hospital survey team” vs. “a team that surveys hospitals”).

Let’s take a few minutes to check your recall of the six best practices.

Knowledge Check

Use abbreviations when they are _____.

- a. shorter and easier to write
- b. used officially within your agency
- c. educational to your readers
- d. convenient to your readers

You should not use abbreviations simply to shorten text, or because they are official agency-used terms, or to educate your readers. The correct answer is use abbreviations when they are convenient to your readers.

Knowledge Check

Action verbs help keep the reader engaged.

- a. True
- b. False

The correct answer is True. Action verbs keep the reader engaged.

Organizing the Documentation

A critical step when completing Form CMS-2567 is to organize your information chronologically according to purpose. Remember you are telling the story of what happened, when, where, and how it happened, and who was impacted.

Documentation needs to be clear, concise, complete, and correct. Remember the basics:

- Write notes and complete Form CMS-2567 so readers can easily find the information they need, understand it, and use it to respond effectively.
- Start with the information they need most.
 - State the requirement that the reader must meet (i.e., the bottom line).
- Answer the most important questions first.
 - Describe the deficiency and the evidence that supports the noncompliance.
 - List who was impacted and what the outcomes were due to the deficient practices.

Organization Methods

If there is more than one finding, organize the information using one of these methods:

Criticality:

- State the highest-priority issue first and add others in order of importance.

Chronology:

- State the issues in the order you discovered them.
- Clearly convey sequential events that result in a citation.

Generality:

- State general information, and then add specific details to support the findings.

Organizing Example

Review the example below:

483.15(a) DIGNITY AND RESPECT OF INDIVIDUALITY

The Bottom Line...

This REQUIREMENT is not met as evidenced by:

Based on interview and record review, the facility staff failed...

Describes the deficiency and the evidence...

to respond in a timely manner to call lights for one of six sampled residents (Resident 10) who sought help with toileting. This failure caused the resident to sit for long periods of time in soiled undergarments...

Use specific actions and descriptions when citing findings...

Findings:

During an interview on 9/18/13 at 2:10 PM, R10 indicated that the resident was frustrated because staff “does not come when you call.” The resident stated that on several occasions the resident was unable to wait and was incontinent. The resident indicated that they felt “humiliated” and had to sit for at least 20 minutes until staff assisted them.

Clinical record review for Resident 10, on 9/18/13, included review of the Minimum Data Set (MDS) assessment completed on 6/22/13. The assessment indicated the resident needed help in and out of the wheelchair and was totally incontinent of bowel and bladder.

On 9/19/13 at 11:15 AM, the charge nurse (RN1) confirmed that R10 had incontinent episodes due to staff failure to respond to the call bell. RN1 stated, “We aim to treat our residents with the utmost respect and care. Unfortunately, staff was unavailable and these incontinent episodes occurred.”

Knowledge Check

When completing Form CMS-2567, surveyors use criticality, chronology, and generality to _____.

- a. choose correct wording for the audience
- b. organize information for understanding
- c. address readers' questions
- d. determine the bottom line

When completing Form CMS-2567, surveyors use criticality, chronology, and generality to organize information for understanding.

Writing in the Active Voice

One grammar rule that writers often overlook is the use of active voice.

What is active voice and why should we use it?

In active voice, the subject of the sentence does the action. In passive voice, the target of the action gets promoted in the subject. Active voice makes your writing more direct, engaging, and descriptive. It allows you to get to the point quickly and efficiently.

To use active voice effectively, identify and dissect passive voice sentences and give them a sense of action by transforming them to active voice.

Differences in Voice

The “voice” in your writing determines how readers will form mental images and understanding. Voice has two primary forms: active and passive. Active voice and passive voice refer to how subjects and verbs are represented in a sentence.

Passive Voice: This form speaks indirectly, often obscuring the subject performing the action.

Example: Form CMS-2567 was completed by the surveyor.

Active Voice: This form speaks in a direct tone and emphasizes the subject that performs the action.

Example: The surveyor completed Form CMS-2567.

Take a moment to reflect on the mental image each sentence creates. In the first sentence, you may have only envisioned the form. In the second, you probably envisioned a surveyor writing (action).

Passive Versus Active Voice

When changing passive voice to active:

- Ask “Where is the action?”
- Change the “action” into a simple verb.
- Make the doer into the subject.

Passive voice example:

- The medications were distributed by the nurses each evening.

Active voice example:

- The nurses distributed the medications each evening.

Let’s see how you’re doing with the next three Knowledge Checks.

Knowledge Check

The following sentence is an example of _____.

Because the hospital had an Immediate Jeopardy (IJ) violation, the survey team conducted a second survey.

- a. redundancy
- b. active voice
- c. passive voice
- d. present tense

The sentence shown is not an example of redundancy, active voice, or present tense. This sentence is an example of passive voice.

Knowledge Check

To make the sentence below active voice, who or what should be the subject of the sentence?

A second survey was conducted by the survey team because the hospital had an Immediate Jeopardy (IJ) violation.

- a. survey team
- b. survey
- c. hospital
- d. Immediate Jeopardy (IJ) violation

Survey, hospital, or Immediate Jeopardy (IJ) violation are not the subject of the sentence. The correct answer is survey team. The survey team is the “doer” of the action (conducted). “A second survey” should be the object, not the subject. To make this active voice, you would reword the sentence to “Because the hospital had an Immediate Jeopardy (IJ) violation, the survey team conducted a second survey.”

Knowledge Check

When writing in active voice, which of the sentence components below should be the first word and subject of a sentence?

- a. The modifier
- b. The action
- c. The doer
- d. The object

Placing objects, modifiers, or actions first in a sentence typically indicates the sentence is passive. The correct answer is the doer.

Punctuation

Even using active voice, you still have to be concerned about correct punctuation.

Punctuation provides important indicators for interpretation of written communications. These signals indicate pauses, change in tone of voice, or emphasis.

The material that follows summarizes the proper use of common punctuation marks that often cause problems, including:

- Commas
- Semicolons
- Colons
- Apostrophes
- Quotation marks

Commas

These examples illustrate correct comma usage:

- *When joining two independent clauses:*
 - The pharmacist filled the orders, and technicians delivered them to the care floors.
- *When using introductory or prepositional phrases:*
 - During the nursing shift change, call bells remained unanswered.
 - Discharge planning remained undocumented; however, it was performed as required.
- *When introducing direct quotes:*
 - The physical therapist said, “Our contracted service provides appointment scheduling.”

Semicolons

These examples illustrate correct semicolon usage:

- *Separate comma-containing elements in series*
 - (Frog Butte, ND; Raritan, NJ; and Ponte Verde, NM)
- *Join two clauses of equal emphasis*
 - The nursing service is understaffed; shifts remain uncovered.
- *Restate the first clause (e.g., that is)*
 - Corrections must be systemic; that is, they must be hospital-wide procedures.
- *Begin with a conjunctive adverb (e.g., therefore, moreover, furthermore, thus) or transition (e.g., in fact, in addition, even so).*
 - Dietary runs a clean facility; in fact, they steam-clean meal carts daily.
 -

Colons

These examples illustrate correct colon usage:

- To join two independent clauses when emphasizing the second clause
 - Administration created a process: staff continues unaware of it.
- When a list follows an independent clause, quotation, appositive, or other idea directly
 - The Appendices that contain the material are: A, B, F, and E. (Independent clause followed by a list)
 - The response is usually: “We don’t have enough staff.” (Quotation)
 - The Director of Nursing, a Registered Nurse, supervises the care of all of the patients in the facility. (Appositive)
- At the end of the greeting in a business letter
 - Dear Sir:
 - To Whom It May Concern:
- To separate the hour and minute(s) in a time notation
 - 11:52

Apostrophes

These examples illustrate correct apostrophe usage:

- Form possessives of nouns
 - the preceptor's instructions
- Show the omission of letters in contractions
 - isn't, can't
- Indicate certain plurals of lowercase letters
 - Mississippi contains four i's and four s's.
- Apostrophes are *NOT* used with possessive pronouns.
 - (e.g., his, hers, its, yours, and ours)
- Apostrophes may be used with indefinite pronouns.
 - (e.g., one's, anyone's, others', no one's, and anybody's)
- Apostrophes are *NOT* used to form most plurals.
 - (e.g., states, 1990s)

Quotation Marks

Below are some tips for using quotation marks:

- Always come in pairs
- Indicate the words from an individual or source
- Indicate publication titles
- May indicate novel or ironic use of a word
- Periods and commas should be included inside of quotation marks

Example 1: The administrator said, “Our QAPI represents the most thorough in our field.”

Example 2: The CEO asked if I had read “The One-Minute Manager.”

Example 3: Medicines delivered within two hours were considered “on-time.”

Knowledge Check

Which sentence demonstrates correct comma use?

- a. Nancy read the information about commas carefully and she earned a perfect score on the practice quiz.
- b. Nancy read the information about commas carefully, and she earned a perfect score on the practice quiz.
- c. Nancy read the information about commas carefully and, she earned a perfect score on the practice quiz.
- d. Nancy, read the information about commas carefully, and she earned a perfect score on the practice quiz.

The sentence that indicates correct comma use answer is “Nancy read the information about commas carefully, and she earned a perfect score on the practice quiz.”

Knowledge Check

Which sentence demonstrates correct usage of quotation marks?

- a. Bureau of the Census publication PC(SI)-108 is titled “Population and Land Area of Urbanized areas for the United States 1970 and 1960.”
- b. Bureau of the Census publication PC(SI)-108 is titled Population and Land Area of Urbanized Areas for the United States 1970 and 1960.”
- c. “Bureau of the Census” publication PC(SI)-108 is titled “Population and Land Area of Urbanized Areas for the United States 1970 and 1960.”
- d. Bureau of the Census publication PC(SI)-108 is titled “Population and Land Area of Urbanized Areas for the United States 1970 and 1960”.

The correct sentence is Bureau of the Census publication PC(SI)-108 is titled “Population and Land Area of Urbanized Areas for the United States 1970 and 1960.”

Spelling

Misspelled words persist, even with the use of spell-check. Formal writing demands correct spelling and word choice.

Correct spelling not only clarifies your message, but it accurately represents your level of knowledge and professionalism.

Spelling Errors

Commonly misspelled words need special attention. The links below list words commonly misspelled or misused in Statements of Deficiency.

[Select this link](#) to view some commonly misspelled words.

[Select this link](#) to view some commonly misused homophones.

Homonyms Practice (1 of 2)

1. Do you _____ Medicare in your clinic?
- except
 - accept

Accept is the correct word.

2. In a patient interview, _____ all the information you can.
- elicit
 - illicit

Elicit is the correct word.

3. The CEO is the _____ officer of the hospital and its board of governors.
- principle
 - principal

Principal is the correct word.

4. The supervisor accepted _____ point and will let you off with a caution.
- you're
 - your

Your is the correct word.

5. The surveyor could not promise full confidentiality, but did promise to be _____.
- discrete
 - discreet

Discreet is the correct word.

6. The doctor gave the patient a _____ for pain medication.
- prescription
 - proscription

Prescription is the correct word.

Key Points

The key points to remember from this module include:

- Organize your writing according to purpose.
- Write in the active voice.
- Always follow proper grammar and punctuation rules.

Module Summary

This module introduced you to the following:

- How to present medical, technical, and legal information in an organized, precise fashion using correct grammar, punctuation, and spelling.

You have now reviewed some important rules for correct grammar, punctuation, and spelling.

Most importantly, remember to:

Proofread! Proofread! Proofread!

Congratulations!

You have just completed this course.