

May 21, 2019

**ILLINOIS HEALTH AND HOSPITAL ASSOCIATION
M E M O R A N D U M**

TO: Chief Medical Officers, Member Hospitals and Health Systems
Chief Nursing Officers
Behavioral Health Constituency Section

FROM: Lia Daniels, Manager, Health Policy

SUBJECT: Feedback Requested by June 10: Hospital Ligature Risk Requirements

The Centers for Medicare & Medicaid Services (CMS) is seeking comment on [draft guidelines](#) intended to clarify its ligature risk policy for hospitals, which applies to environmental safeguards for patients at risk of harm to self or others. CMS has requested that comments and questions be submitted by June 17 to HospitalSCG@cms.hhs.org. IHA will submit a response on behalf of its members. **Please review the draft guidance with your behavioral health compliance team and email your comments to Lia Daniels, Manager, Health Policy, at ldaniels@team-iha.org by June 10 for inclusion.**

Proposed changes to CMS policy on ligature risk focus on:

- Clarifying existing 2017 ligature risk interpretive guidelines on what constitutes a ligature risk and expectations for different units of a hospital;
- Differentiating between locked and unlocked psychiatric units, requiring *locked* units to be ligature resistant and *unlocked* units to screen patients to determine risk and safety measures to mitigate risk;
- Proposing a process for hospitals to request an extension for remedying risks that may require more than 60 days to carry out;
- Requiring new staff education and training for hospital staff on patient screening, assessment, identification of risk factors, mitigation strategies and any revised internal policies or procedures; and
- Survey procedure requirements on hospital policies, including initial and routine staff training regarding environmental risk, assessment and reassessment of patient risk for suicide or harm, and defining 1:1 monitoring and continuous observation to ensure immediate intervention.

If you have any questions or comments regarding this notice, please contact Lia Daniels at (630) 276-5461 or ldaniels@team-iha.org.