

Center for Medicaid and State Operations/Survey and Certification Group

**Ref: S&C-04-06**

**DATE:** November 13, 2003

**TO:** State Survey Agency Directors

**FROM:** Director  
Survey and Certification Group

**SUBJECT:** Definition of “Significant Difference” for Federal Oversight Support Survey (FOSS) and Long Term Care (LTC) Comparative Surveys

The purpose of this memorandum is to clarify the definition of the term “significant difference” as used in State Performance Standard #3 (certifications are fully documented, and fully consistent with applicable law, regulations and general instructions), the FOSS and Comparative Survey Access database, and Online Survey Certification And Reporting (OSCAR) system for LTC surveys.

**Definition:**

Significant difference: Deficiencies not cited by the State Agency that should have been, at or above the Scope and Severity level “F.”

For questions concerning this policy, please contact Dawn Hawkins Johnson at (410) 786-1117 or via email at [dhawkinsjohnson@cms.hhs.gov](mailto:dhawkinsjohnson@cms.hhs.gov).

**Effective Date:** Immediately.

**Training:** The information contained in this announcement should be shared with all survey and certification staff, their managers and the State/Regional Office training coordinator.

/s/  
Thomas E. Hamilton

cc: Survey and Certification Regional Office Management (G-5)