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NEWS RELEASE

FOR RELEASE

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Auditor of State Rob Sand today released a report showing that the State of Iowa is failing to meet the federal mandate on inspections of nursing homes certified to accept Medicare or Medicaid and that Iowa is inspecting certified nursing homes at a slower rate compared to neighboring states.

Additionally, Iowa ranks 46th nationally in the amount of licensed nursing staff per resident. Iowa has the 17th highest turnover rate among nursing staff. Nearly 11 out of 20 nurses who worked at a certified nursing home in the previous year are no longer employed at the facility.

The Auditor's Office calculations find that the State of Iowa conducts inspections, on *average*, every 17.1 months. This is more than 4 months more than the federal mandate requiring certified nursing homes to be inspected, on *average*, every 12.9 months. CMS also instructs states to inspect *individual* nursing homes at least once every 15.9 months; 85.4% of Iowa's 403 certified nursing homes did not meet this expectation on at least one occasion in the past 3 inspections.

In preparing this report, the Auditor's Office used publicly available data from the Centers for Medicare and Medicaid Services (CMS). Specifically, the Auditor's Office calculated the duration between completed standard inspections across all certified nursing homes to determine the frequency. This report also takes into consideration the national pause on inspections at nursing homes during the COVID-19 pandemic to reach its findings. Durations that occurred during the COVID-19 stoppage are shortened by 147 days – the length of time between official federal guidance to stop and restart onsite standard inspections.

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Iowa Nursing Home Inspection Frequency and Staffing

- There are 403 Medicare and/or Medicaid certified nursing homes¹ in the State of Iowa as of June 1, 2024. In total, their reported capacity is 27,412 beds. The most recent average daily total across these facilities was 19,937 residents.
- The average gap between completed health inspections in Iowa is greater than the 12.9 months (387 days) statewide average mandated by the federal government and higher than in bordering states. In Iowa, the average time between completed inspections was 514 days when taking into account the COVID-related pause in standard inspections, 4.2 months more than the federal mandate. The bordering state average was 495 days.
- Seventeen out of every twenty certified nursing homes in Iowa had a period between inspections greater than the federal individual nursing home mandate of 15.9 months over their past 3 health inspections, even when considering the COVID-related stoppage. In bordering states, 53% of nursing homes had a health inspection gap greater than 15.9 months.
- Out of the past 3 standard health inspections, Iowa certified nursing homes averaged 1.27 instances going more than 15.9 months between inspections. However, bordering states' nursing homes averaged just 0.75 instances over a 15.9-month duration, while nationally the average was 1.17.
- 45.2% of Iowa nursing homes that reported staffing information do not meet the federal standard of total nursing staff levels of 3.48 hours/resident/day or greater. A standard recently implemented in April 2024.
- Iowa ranks 46th nationally in licensed nursing staff levels at 1.32 hours/resident/day which is below the average across the rest of the country of 1.53 hours/resident/day.
- The average total nurse staffing turnover rate for Iowa was 54%, making Iowa the 17th highest state for nursing turnover rates. This means that on average, 54% of nurses who worked in a nursing home had left that facility in the past 12 months.

¹ Throughout this document, any references to “nursing home” means exclusively skilled nursing or nursing facilities certified to participate in the Medicare and/or Medicaid programs.

Nursing Home Inspection Frequency

The Centers for Medicare and Medicaid Services (CMS) stipulates that states are responsible for conducting standard survey inspections for every *individual* certified nursing home at least once every 15 months. This is to recertify compliance (or noncompliance) with requirements for participation in Medicare and Medicaid under their respective 1864 Agreements, which guide state's administration of these programs predominately funded by the federal government. CMS extends this timeframe to 15.9 months to evaluate whether this requirement is met. Additionally, for states to meet their 1864 Agreement responsibilities, the statewide average interval between standard surveys across *all* nursing homes needs to be 12.9 months or less.² This means that each individual nursing home should have a gap between inspections of less than 15.9 months, but if that that inspection gap is greater than 12.9 months other nursing homes in the state would need to be inspected at a more frequent rate in order to still meet the average *statewide* requirement.

Individual states are responsible for conducting inspections of certified nursing home facilities. In Iowa, this falls under the purview of the Department of Inspections, Appeals, and Licensing (DIAL). CMS makes inspection data publicly available for the 3 most recent standard health inspections for every certified nursing home in the country, regardless of how long ago the most recent 3rd inspection took place.³ The dataset used in this document included information CMS had received as of June 1, 2024. This allows for an assessment of inspection frequency and nursing home characteristics within and between states.

As of June 1st, 8.9% of Iowa certified nursing homes have not received a standard inspection in the previous 15.9 months. Among states sharing a border with Iowa,⁴ that figure is 6.7%.⁵ On average, the most recent health inspection for Iowa nursing homes was 288 days (9.6 months) before June 1 compared to 254 days in bordering states.⁶ Because the date of future inspections is unknown, it's better to look at the timeframe between completed standard surveys. From this, the average duration between inspections can be assessed.^{7 8}

² US Dept. of Health and Human Services – Office of Inspector General, *CMS Should Take Further Action To Address States With Poor Performance in Conducting Nursing Home Surveys*, Report in Brief, OEI-06-19-00460, Jan 2022

<https://oig.hhs.gov/oei/reports/OEI-06-19-00460.pdf>

³ <https://data.cms.gov/provider-data/dataset/4pq5-n9py>

⁴ All bordering state figures are the averages of all nursing homes located in Illinois, Wisconsin, Minnesota, South Dakota, Nebraska, and Missouri. These are utilized as a comparison rather than national averages because of their relatively similar demographics and socioeconomics as well as similarly low number of residents per location.

⁵ Two-sample t-test, $t=-1.63$, $p=0.103$, $n=2530$

⁶ Two-sample t-test, $t=-4.12$, $p=0.0000$, $n=2530$

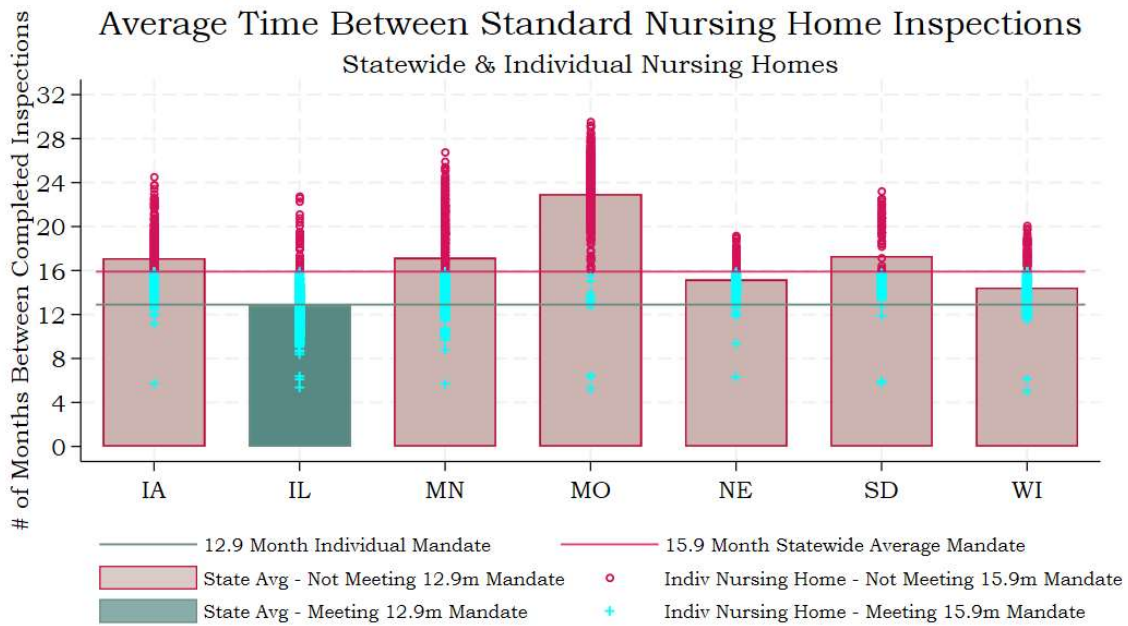
⁷ However, the COVID-19 pandemic led CMS to direct state survey agencies to pause their routine inspections as of March 23, 2020. On August 17, 2020, CMS revised their guidance to state survey agencies authorizing them to restart onsite standard oversight surveys. In order to take the pandemic-related inspection stoppage into account, any gap between an inspection prior to March 23, 2020 and an inspection after August 17, 2020 is shortened by the 147 days between those two dates. This means that the duration between an inspection on March 1, 2020 and March 1, 2021 is adjusted as 218 days rather than 365 days. This COVID-adjustment applies to both the average duration and 15.9-month overrun figures presented below. For more information see:

- Stevenson, D. G., & Cheng, A. K. (2021). Nursing home oversight during the COVID-19 pandemic. *Journal of the American Geriatrics Society*, 69(4), 850–860. <https://doi.org/10.1111/jgs.17047>
- Centers for Medicare and Medicaid Services. Enforcement Cases Held During the Prioritization Period and Revised Survey Prioritization. Memo # QSO-20-35-ALL; 2020. <https://www.cms.gov/files/document/qso-20-35-all.pdf>

⁸ Iowa conducted its first standard survey 10 days after this. 27 states resumed in-person standard surveys within 45 days of this guidance. The border states that resumed more than 45 days later were SD (52) & WI (170)

The average gap between completed health inspections in Iowa is greater than the federally mandated 12.9-month period average and significantly higher than in bordering states. In Iowa, the average time between the most recent and 2nd most recent as well as the 2nd and 3rd most recent inspections was 514 days (17.1 months), adjusted for COVID-stoppage. The average within bordering states was 495 days (16.5 months); 19 fewer days between inspections. This nearly 3-week difference between Iowa’s mean standard survey gap and the bordering state average is statistically significant.⁹ As shown in Figure 1 below, Illinois was the only bordering state with a completed inspection gap below the statewide average mandate, but that across all states there are a number of nursing homes with average completed inspection durations above the individual mandate.

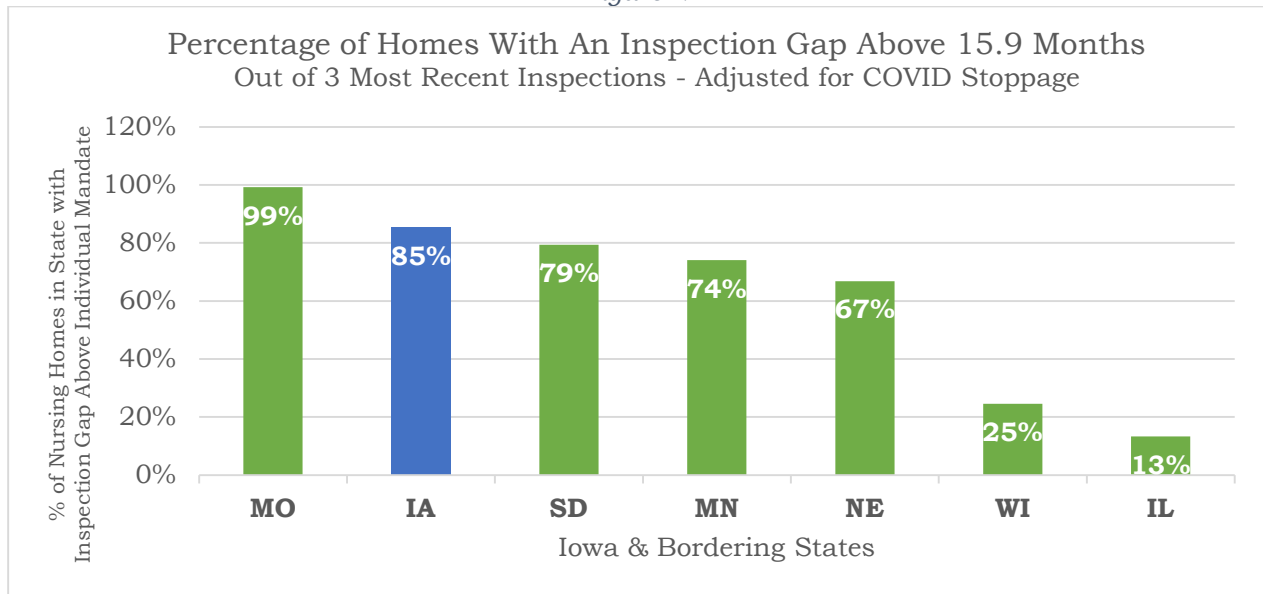
Figure 1



85.4% nursing homes in Iowa witnessed at least one period between standard inspections greater than the 15.9-month individual federal mandate over their past 3 inspections (adjusted for the pandemic stoppage). Across all bordering states just more than half of nursing homes (52.5%) witnessed an inspection gap of that length.

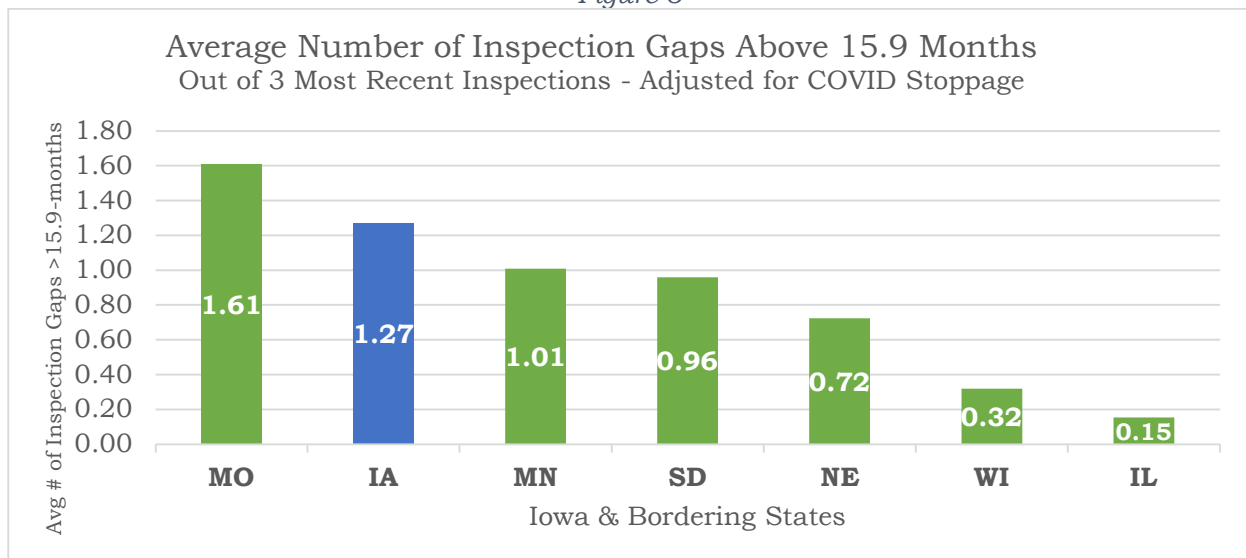
⁹ Two-sample t-test, t=-2.55, p=0.006, n=2513

Figure 2



Iowa nursing homes on average had 1.27 instances of an inspection gap with a duration greater than 15.9 months. This is out of a possible 3 instances in the dataset. Bordering state nursing homes averaged less than 1 (0.75) 16 month or greater inspection gap. The difference between these means is statistically significant.¹⁰

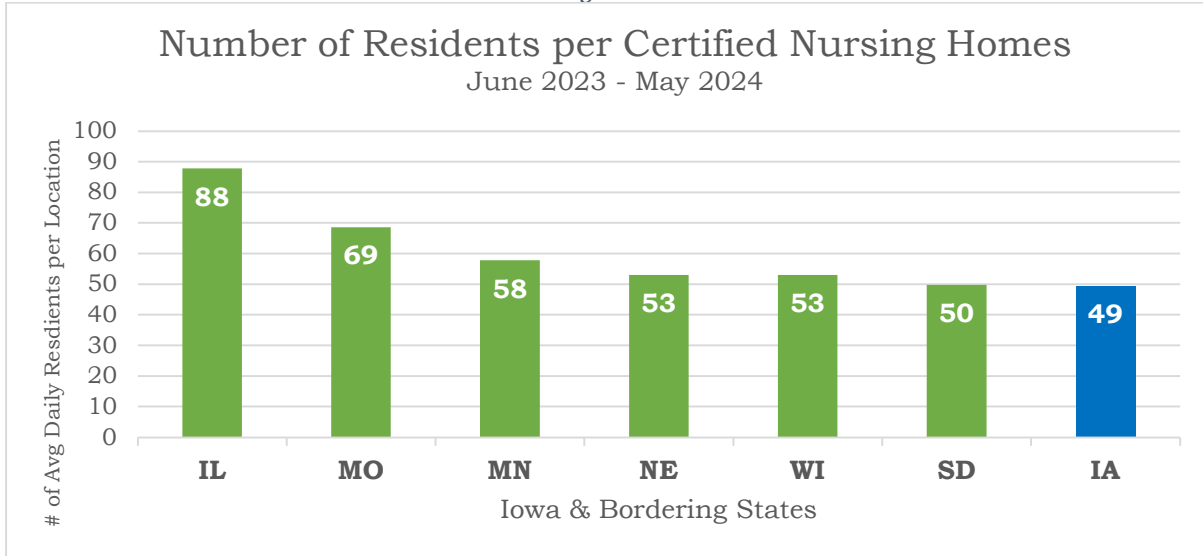
Figure 3



¹⁰ Two-sample t-test, $t=-12.25$, $p=0.0000$, $n=2530$

Nursing Home Staffing

Figure 4



According to the CMS, there are 403 distinct Medicare and Medicaid certified nursing homes in the State of Iowa. A decline of three since the start of 2024. In total, these certified nursing homes have a capacity of 27,412 beds. The statewide daily average across these facilities was 19,937 residents. This means that 72.7% of beds are occupied by a resident on an average day, placing Iowa 34th in the country in capacity used.¹¹ Within bordering states, 70.1% of nursing home beds are occupied on an average day. Nationally three-quarters (76%) of certified nursing home beds are occupied. With approximately 49 daily residents per nursing home, Iowa has the 4th lowest density of residents per location in the country.

The CMS data also provides insight into the staffing levels and turnover within certified nursing homes that follow federal regulation in reporting this data. In Iowa, 389 out of the 403 certified nursing homes (96.5%) had reported staffing data as of June 1. Across the rest of the country, 97.3% reported. These staffing figures indicate that in Iowa there are on average enough nurses to dedicate 3.67 hours per resident per weekday. This is slightly below the national average of 3.78 hours per patient, but about the same as bordering state average of 3.65 hours per patient.

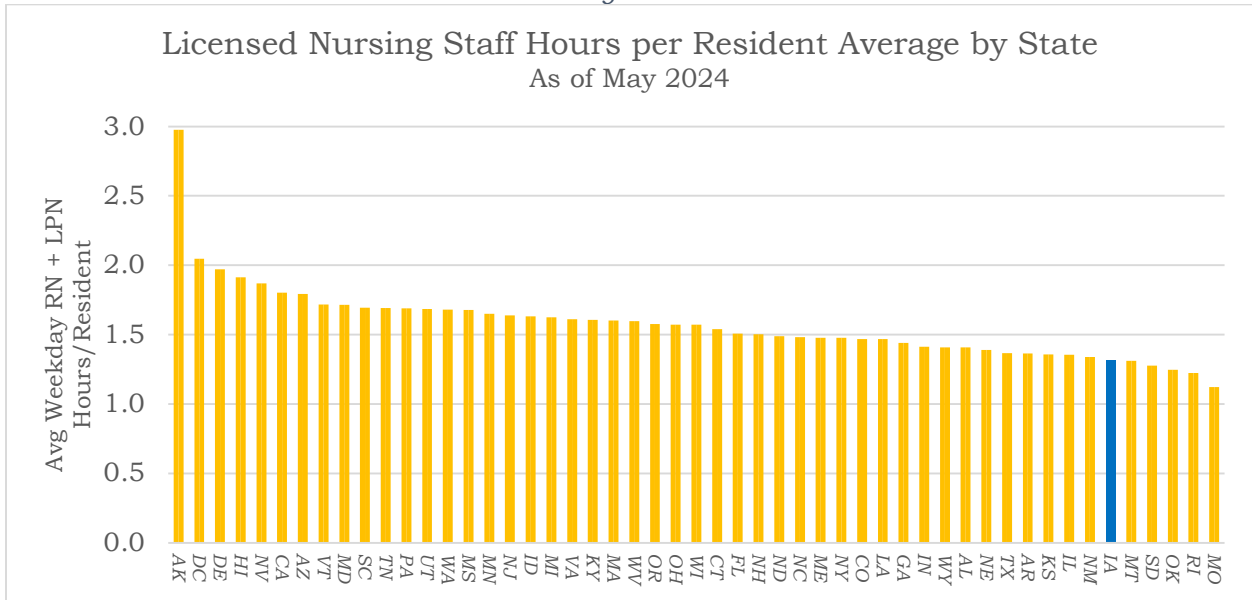
In April 2024 CMS issued a “Minimum Staffing Standards for Long-Term Care Facilities and Medicaid Institutional Payment Transparency Reporting” rule.¹² Part of these new standards include a minimum of 3.48 total nurse hours per resident per day. The 3.67 statewide average meets that specific standard. However, 45.2% of Iowa nursing homes reporting staffing data fell below this new federal benchmark. This is the 15th highest rate in the country, with 40.9% of nursing homes below this level nationally.

Nursing homes in Iowa rank lower when looking exclusively at licensed nursing staff (Registered Nurses and Licensed Practical Nurses). In Iowa, nursing homes on average have licensed nurses to dedicate 1.32 hours per resident per weekday, while the rest of the country averages 1.53 licensed nursing hours per resident daily. Iowa ranks 46th in the country for licensed nursing staff hours per resident, ahead of Montana, South Dakota, Oklahoma, Rhode Island, and Missouri.

¹¹ All references to national rankings in this report include all 50 states plus the District of Columbia.

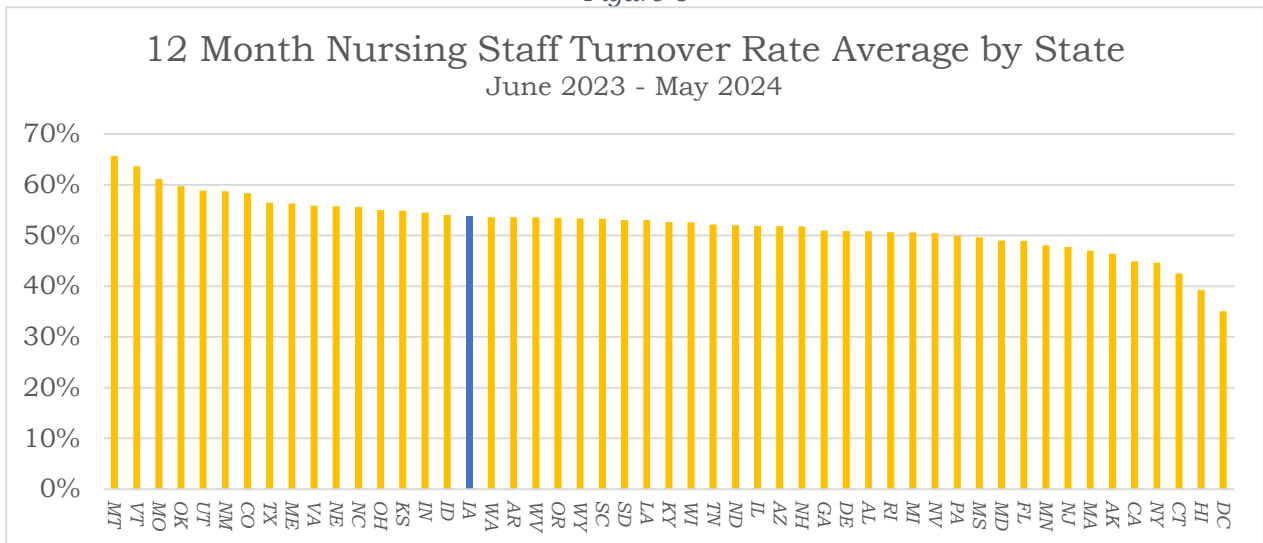
¹² <https://www.cms.gov/newsroom/fact-sheets/medicare-and-medicaid-programs-minimum-staffing-standards-long-term-care-facilities-and-medicaid-0>

Figure 5

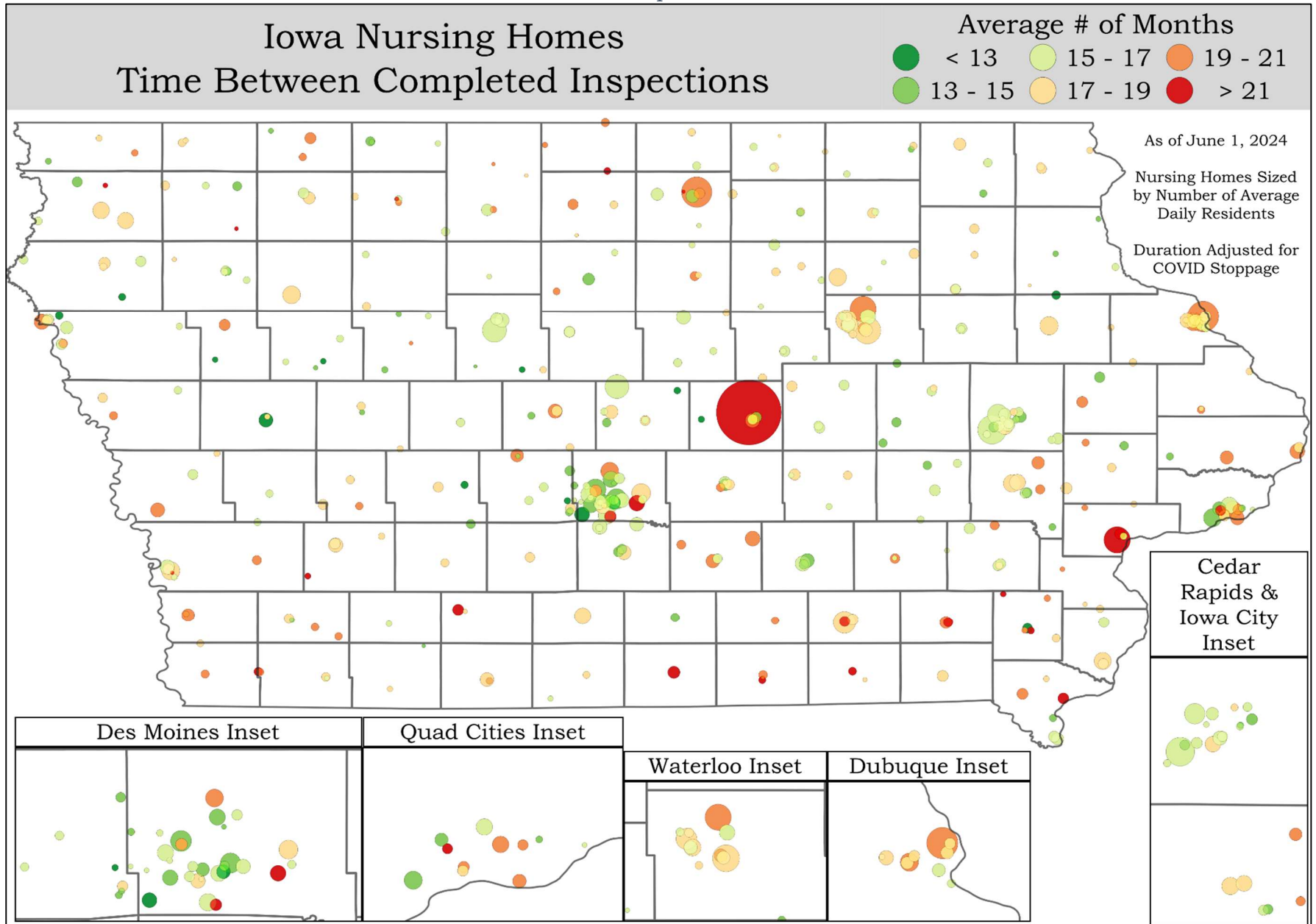


In the past year, Iowa nursing homes experienced, on average, 54% of their nursing staff leaving their facility. So more than half of the nursing staff who worked in a nursing home between June 2023 and May 2024 left their position during that same period. Iowa had the 17th highest nursing staff turnover rate in the nation, more than the national average of 52%.

Figure 6

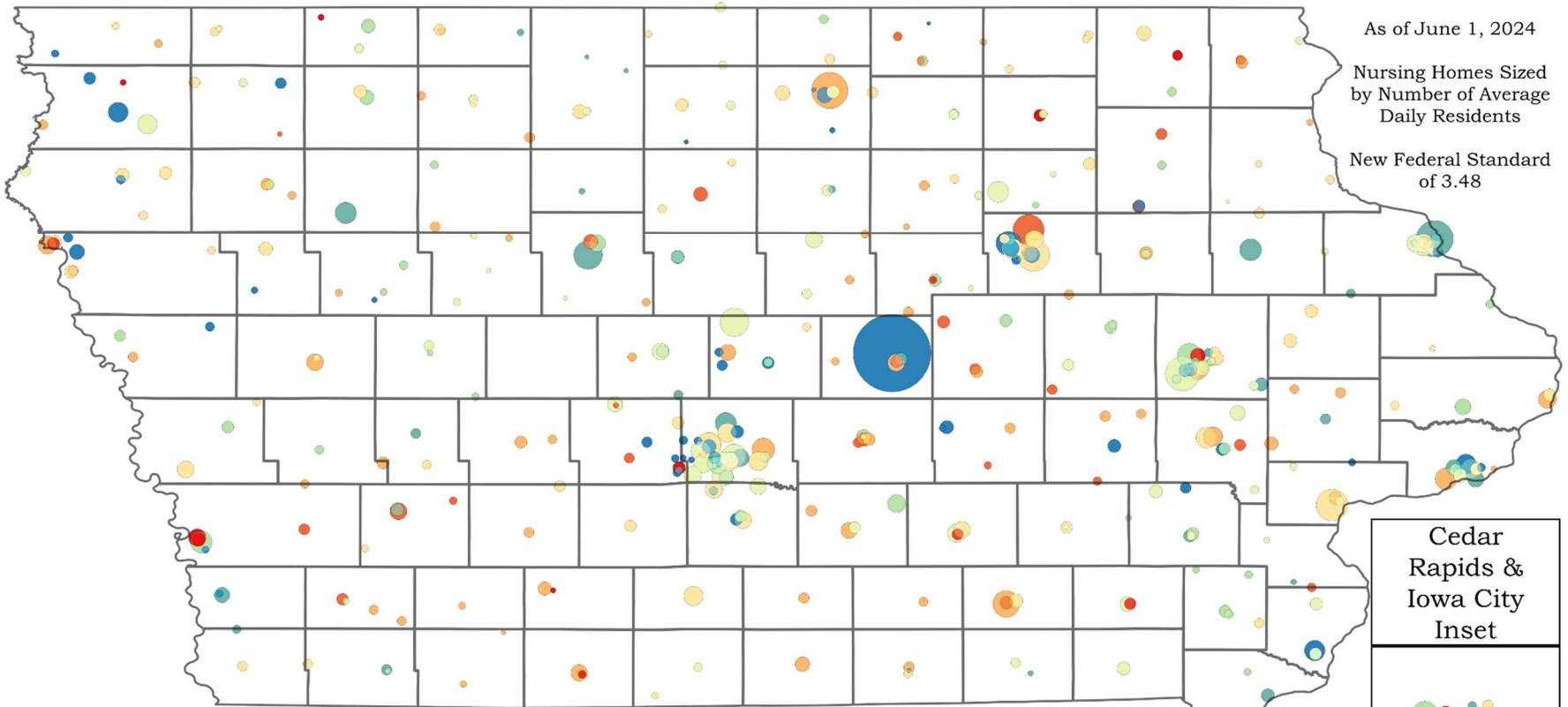


Map 1

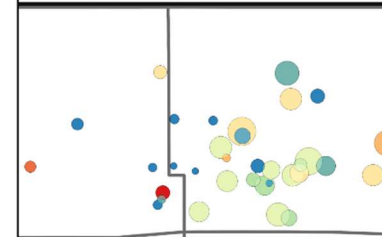


Map 2

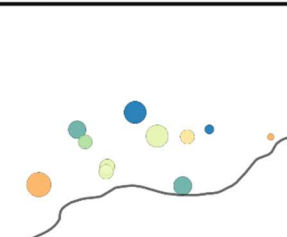
Iowa Nursing Homes Daily Total Nurse Hours Per Resident Day



Des Moines Inset



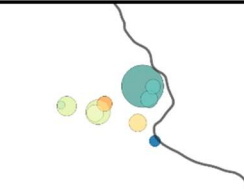
Quad Cities Inset



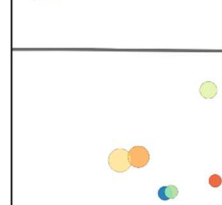
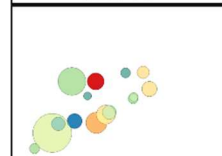
Waterloo Inset



Dubuque Inset



Cedar Rapids & Iowa City Inset

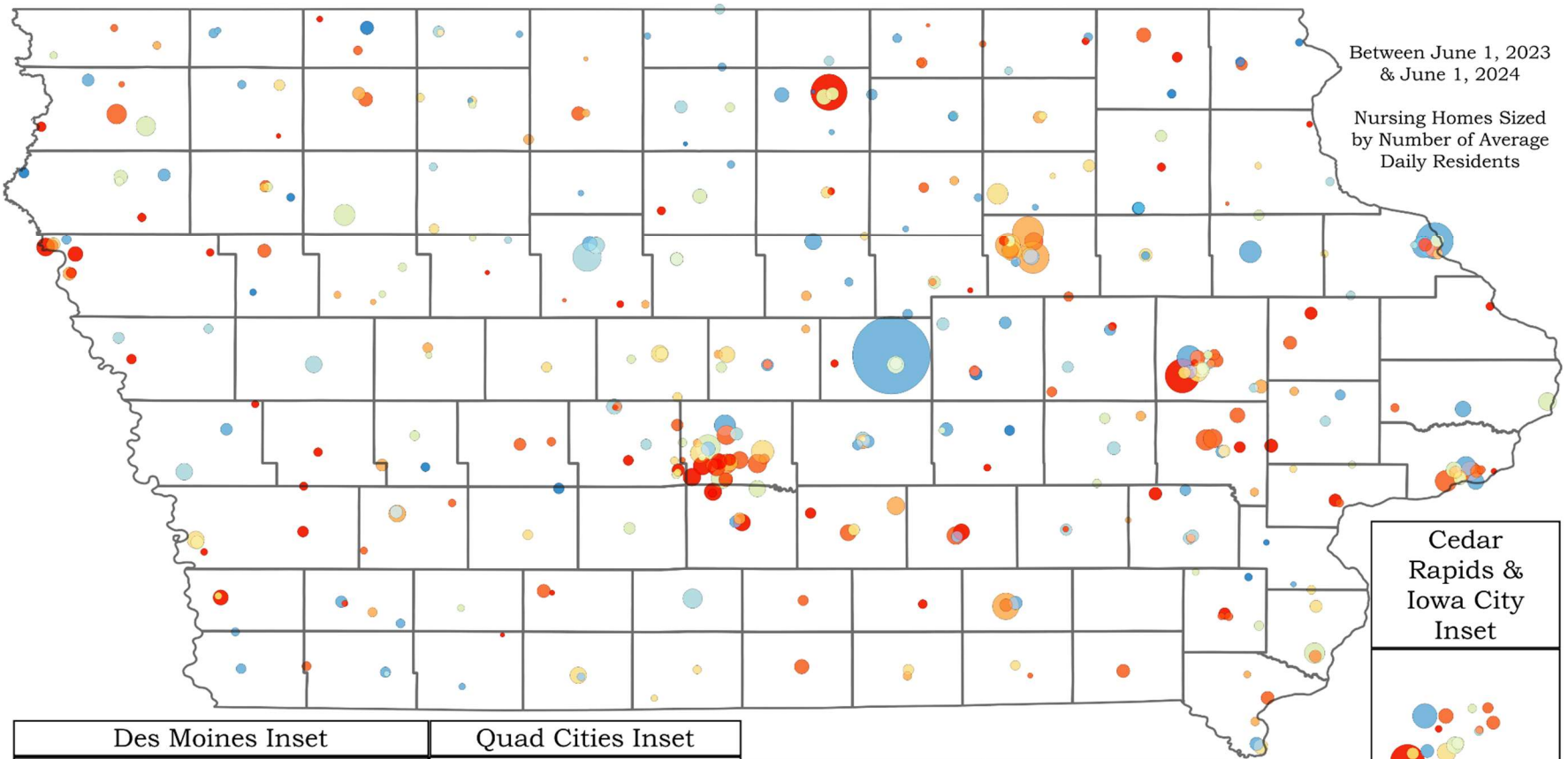


Iowa Nursing Homes Total Nursing Staff Turnover

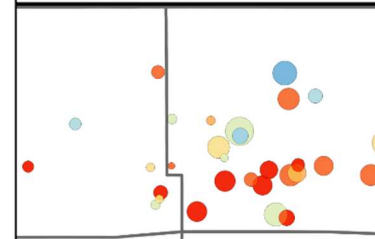


Between June 1, 2023
& June 1, 2024

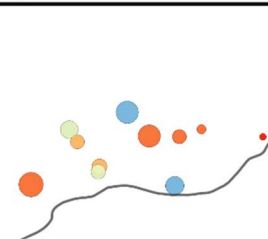
Nursing Homes Sized
by Number of Average
Daily Residents



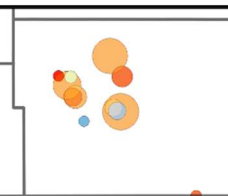
Des Moines Inset



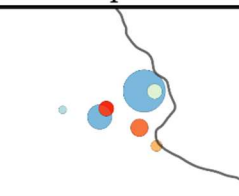
Quad Cities Inset



Waterloo Inset



Dubuque Inset



Cedar
Rapids &
Iowa City
Inset

