

State Survey Activity, 2022–2024

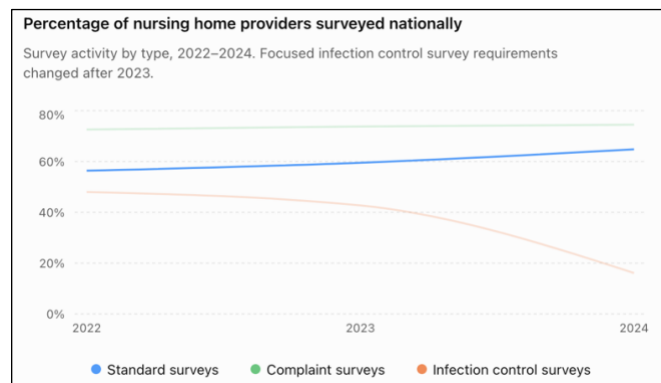
Standard surveys, which are required to take place on a roughly annual basis, are the principal means by which state survey agencies assess whether nursing homes are complying with federal requirements for resident care, safety, and dignity. Complaint surveys are also crucial, since they are essentially the only mechanism for identifying and rectifying violations of minimum standards in between standard surveys. The third type of surveys tracked in federal data, focused infection control surveys, were implemented during the COVID pandemic. They are not discussed in depth here.

FINDINGS: STANDARD SURVEYS

Nationally, the percentage of nursing home providers receiving a standard survey increased over the three-year study period, from 56.4% in 2022 to 59.4% in 2023 and 64.8% in 2024. Thus, while standard survey coverage remained well below the federal requirement that states survey facilities once a year, on average, to ensure resident safety and compliance with minimum standards of care, the national trend moved in a positive direction over the course of the study period.

The improvement was widespread, though far from uniform. **Only thirty-four of the 52 states⁶ had a higher percentage of providers receiving standard surveys in 2024 than in 2022.** Several states showed particularly large increases. Idaho rose from 16.7% of providers surveyed in 2022 to 72.2% in 2024; Delaware increased from 34.7% to 89.8%; and California increased from 38.1% to 71.6%. New Jersey, Mississippi, Washington, and Massachusetts also experienced increases of more than 20 percentage points over the period.

By 2024, several states reported standard survey coverage approaching or exceeding 85%. New Hampshire had the highest rate, at 93.6%, followed by Nevada (93.0%), Delaware (89.8%), Louisiana (87.8%), Pennsylvania (87.6%), and Rhode Island (85.9%). At the other end of the spectrum, Alabama reported standard surveys at only 12.1% of providers in 2024, followed by Tennessee (26.9%), Virginia (30.5%), Maryland (35.8%), Ohio (36.0%), and Kentucky (39.9%). Alabama and Virginia declined in each year of the study period. Arizona experienced the largest overall decline, falling from 80.4% in 2022 to 50.3% in 2024.⁷



⁶ For the sake of simplicity, we refer to the jurisdictions included in the study – the 50 states, Washington, DC, and Puerto Rico – as “states” or “jurisdictions” in the report and data files.

⁷ As noted above, federal requirements provide that state agencies are to conduct standard surveys at a statewide average interval of 12 months, with individual facility timeframes of 9–15 months. Consequently, the percentage of facilities surveyed within a calendar year is not equivalent to the percentage receiving timely or overdue surveys.

FINDINGS: COMPLAINT SURVEYS

As noted above, complaint surveys are a critical component of nursing home oversight and quality assurance. They are generally the only time that surveyors are assessing a facility's care in between standard surveys. Research has shown that, for mistreatment citations, complaint surveys were more likely to be substantiated as serious as compared to standard surveys.⁸ This is likely due to surveyors investigating at or close to the time of the violation, making substantiation of the deficiency easier.

Complaint survey activity followed a markedly different pattern from standard survey activity. **The percentage of providers receiving complaint surveys remained essentially flat, increasing only modestly from 72.6% in 2022 to 73.8% in 2023 and 74.5% in 2024.** Some states consistently reported complaint survey activity at relatively high percentages of providers. In 2024, **Nevada reported complaint surveys involving 91.6% of providers, while South Carolina, Delaware, and California were each near 88%.** Other states experienced sizable increases over the study period, including South Dakota, Idaho, New Jersey, and North Dakota. Conversely, Alabama declined from 45.0% in 2022 to 18.3% in 2024, and Tennessee declined from 77.1% to 50.9%. At the other end of the spectrum, **the states with the lowest percentages of complaint surveys were Puerto Rico (7.1%), Alabama (18.3%), Maryland (45.3%), Kentucky (46.8%), and Massachusetts (48.2%).**

It is important to note that these data do not tell us whether complaints were appropriately investigated, substantiated, or resulted in deficiencies or findings of resident harm. An OIG report found that “many States are consistently failing to meet required timeframes for investigating the most serious nursing home complaints” and that their overall “analysis raises questions about some States' ability to address serious nursing home complaints and also about the effectiveness of CMS's oversight of States.”⁹

Thus, a high complaint-survey percentage indicates greater complaint investigation activity, but not necessarily more effective enforcement of minimum standards of care and safety. Survey frequency, however, is only one component of oversight. The extent to which state survey agencies are effectively identifying violations, appropriately assessing their severity, and taking meaningful enforcement action is addressed in the analyses that follow.

Complete state survey activity data are available on the webpage for this report, <https://nursinghome411.org/ltccc-enforcement-study-2026/>.

⁸ Liu, P.-J., Caspi, E., & Cheng, C.-W., “Complaints Matter: Seriousness of Elder Mistreatment Citations in Nursing Homes Nationwide,” *Journal of Applied Gerontology*, (2022) 41(4), 908-917. <https://journals.sagepub.com/doi/10.1177/07334648211043063>

⁹ US HHS OIG, States Continued To Fall Short in Meeting Required Timeframes for Investigating Nursing Home Complaints: 2016-2018, OEI-01-19-00421 (2020). <https://oig.hhs.gov/reports/all/2020/states-continued-to-fall-short-in-meeting-required-timeframes-for-investigating-nursing-home-complaints-2016-2018/>