

A PLANNING TOOL FOR HOSPITAL AND CRITICAL ACCESS HOSPITAL LEADERS

Are we ready for the CMS obstetric rules?

CMS’s final rule phases in new requirements for hospitals and critical access hospitals that provide obstetric services. This checklist turns each phase into plain questions your CNO, CMO and compliance officer can answer together. Work through it, assign an owner to every “Partly” or “No,” and bring the gaps to your next quality meeting.

Source: Federal Register 2024-25521, November 27, 2024. This checklist is a planning aid, not legal advice. CMS does not certify individuals or approve a hospital’s policies. Your compliance officer should confirm what applies to your hospital, and your hospital owns its own policies and records.

Phase 1 · In effect since July 1, 2025

EMERGENCY READINESS AND TRANSFER PROTOCOLS

| QUESTION                                                                                                | STATUS                                                                                   | OWNER / NOTES |
|---------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|---------------|
| Do we have written protocols for obstetric emergencies, complications and immediate post-delivery care? | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Are they consistent with nationally recognized, evidence-based guidelines? Who checked, and when?       | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Do we have written transfer protocols for patients who need a higher level of care?                     | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Do the nurses and providers who would use them know where they are and what they say?                   | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Have the right bodies (for example, medical staff and governing body) reviewed and approved them?       | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |

Phase 2 · In effect since January 1, 2026

ORGANIZATION, STAFFING AND DELIVERY OF OBSTETRIC SERVICES

| QUESTION                                                                                                     | STATUS                                                                                   | OWNER / NOTES |
|--------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|---------------|
| Are our obstetric services organized and staffed to match the scope and complexity of the services we offer? | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Is it clear who is responsible for obstetric services, and who is on call for what?                          | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Does our staffing and call coverage hold up in our thinnest month, not just an average one?                  | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Does the care we deliver match what our policies say? When did we last check against a real case?            | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |

## Phase 3 · Begins January 1, 2027

### STAFF TRAINING AND AN OBSTETRIC QUALITY PROGRAM

Illustrative sample. Not legal advice. CMS does not certify individuals.

[catchmentmaternity.com](http://catchmentmaternity.com)

| QUESTION                                                                                                              | STATUS                                                                                   | OWNER / NOTES |
|-----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|---------------|
| Do we have a written plan to train obstetric staff on evidence-based practice, covering new and existing staff?       | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Is training on a regular cycle (every two years), with a calendar that someone owns?                                  | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Do we keep a completion record for each person, ready for a surveyor?                                                 | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Have we named who runs obstetric quality assessment and performance improvement, what data they review and how often? | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |
| Do our drills and training use our own protocols, so what staff practice is what the policy says?                     | <input type="checkbox"/> Yes <input type="checkbox"/> Partly <input type="checkbox"/> No |               |

### Questions to bring to your compliance officer

- Which of these requirements apply to us as a hospital or as a critical access hospital, and when?
- How will our surveyor or accrediting body review our records?
- Who signs off on policy changes, and how long does approval take?

Catchment Maternity helps with the training, the policy and protocol review behind it, and the midwives to carry it. See [catchmentmaternity.com/staff-training.html](http://catchmentmaternity.com/staff-training.html).