

CMS INSPECTION SURVEYS: ARE YOU READY?

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OBJECTIVES

- ▣ DISCUSS WHAT YOU CAN DO TO BE PREPARED FOR YOUR CMS SURVEY VISIT
- ▣ REVIEW CMS SURVEYOR TOOLS
- ▣ IDENTIFY COMMON CMS SURVEYS FINDINGS IN ASCS

TRACY'S EXPERIENCE

- ▣ HAD SUCCESSFUL CMS UNANNOUNCED SURVEY WITH ONLY 1 DEFICIENCY IN DECEMBER 2010
 - First Center that Surveyor had given less than 6 deficiencies to
 - First Center that Surveyor did not give infection control or cleanliness deficiency to
- ▣ NOT A CMS EXPERT BUT WILL SHARE THE THINGS THAT HELPED US TO HAVE SUCH A SUCCESSFUL SURVEY

TIPS FOR SURVEY READINESS

- ▣ KNOW WHAT IS IN THE CMS AND STATE REGULATIONS
- ▣ WRITE YOUR POLICIES TO CMS REGULATIONS AND FOLLOW THEM
- ▣ BE ORGANIZED AND PAY ATTENTION TO DETAIL
 - Med Records In Same Order And Complete
 - Employee Files In Same Order And Complete
 - Credentialing Files In Same Order And Complete
 - OR Logs

▣ CONSTANT PREPARATION

- Current Meeting Minutes
- Current Vendor Contract Lists
- Employee List With Credentials
- Active Medical Staff List
- Staff Schedule
- In-service Records
- Fire Drills
- Quality Improvement Program
- Infection Control Assessment & Plan
- Disaster Preparedness
- Manufacturer Guidelines For Equipment Operation And Disinfectant

▣ HAVE CMS SURVEY MANUAL READY AT ALL TIMES WITH THE EXPECTED ENTRY LIST OF ITEMS THEY WILL NEED

- A list of all surgeries scheduled over the next two days; the list should include each patient's name, age, type of surgical procedure scheduled or performed, and the physician performing the procedure. 1-2 cases will be selected for observation.
- A list of all surgeries from the past six months; the list should include each patient's name, age, type of surgical procedure performed, and the physician who performed the procedure.
- All cases in the past year, if any, where the patient was transferred from the ASC to a hospital or where the patient died; the list should include each patient's name, age, type of surgical procedure performed, and the physician who performed the procedure.

- Rules and Regulations/ Medical Staff Bylaws and list of Governing Body Members.
- Governing Body meeting minutes for the last year.
- Sample of patient records (surveyor will select records to be reviewed).
- A list including the names of the Director of Nursing, active Medical Staff, Allied Health Professionals, and all other staff providing patient care. Provide copies of all current licenses, BLS, and ACLS certification and job descriptions.
- Copy of staff schedules for last week and this week. Staff Schedule as worked for past week.

- A copy of the facility's organizational chart.
- ASC policy and procedure manuals (surveyor will select policies to be copied).
- Copy of policies and procedures related to the advance directive requirements.
- Copy of grievance policy; all grievances over the past year.
- Copy of Patient's Rights and any accompanying policy and procedures.
- ASC personnel records (surveyor will select records to review).
- Written documentation related to the ASC's infection control program and its program for on-going assessment self-assessment of quality.

- Identify each practitioner who currently has surgical privileges or has had privileges within the last 6 months.
- Credential file of all Medical Staff who have been granted privileges (surveyor will select files to review).
- Copy of your Quality Assurance Performance Improvement Program.
- Copy of your Disaster Plan.
- Copy of CLIA and copy of Contracted Lab's CLIA if you have a lab contract.
- Medication Administration Policy and Procedure.
- Blood and Blood Products Administration Policy and Procedure.

- Verbal orders Policy and Procedure.
- Discharge Criteria.
- History and Physical requirements Policy and Procedure.
- Anesthetic Risk and Evaluation before surgery by MD Policy and Procedure.
- Evaluation before discharge by MD or anesthesiologist Policy and Procedure.
- Time out Policy and Procedure
- Medical Records Form and Content Policy and Procedure.
- Exempted surgeries from responsible adult requirement.

- ▣ USE SURVEYOR WORKSHEETS TO ASSESS YOUR FACILITY.
- ▣ HAVE A CONSULTANT PERFORM MOCK SURVEYS
- ▣ NETWORK WITH YOUR PEERS THROUGH STATE ASC ASSOCIATION, MANAGEMENT COMPANY, AND CONFERENCES
- ▣ BENCHMARK YOUR QUALITY INDICATORS WITH OTHER ASCS FOR CQI
- ▣ KNOW THE MOST COMMON DEFICIENCIES CITED IN YOUR STATE

- ▣ PREPARE YOUR STAFF WITH SURVEY READINESS THROUGH EDUCATION
- ▣ EDUCATE YOUR BOARD OF MANAGERS AND PHYSICIANS ON SURVEY READINESS
- ▣ TREAT THE SURVEYORS AS IF THEY ARE THERE TO HELP YOU
- ▣ EXPECT ONE OR MORE DEFICIENCIES
- ▣ SUBMIT YOUR PLAN OF CORRECTION ON TIME AND DO WHAT YOU SAY YOU ARE GOING TO DO TO CORRECT THE DEFICIENCY


