

Keeping you "in the know" in the ASC industry



# Surveyors CMS Joint Commission AAAHC

#### Governance

- Governing Body (GB) meetings are not conducted
- No documentation of GB meeting minutes
- Contracted services are not evaluated annually or not properly evaluated



# PROGRESIVE SUPPORT PROGRESIVE SUPPO

# Credentialing/Privileging

- Not complete and/or not consistent
- Missing privilege request forms or privileges not consistent with procedures performed
- · Expired documents
- Malpractice insurance or limitations are not consistent with by-laws
- Failure to reappoint physicians prior to reappointment date
- Peer references not done upon initial appointment
- Peer review is not considered or documented upon reappointment

#### Infection Control

- No documentation of air exchange rates
- Staff not wearing gloves while instilling eye drops
- Hand washing not done before and after patient contact, donning and removing gloves
- Glucometer not cleaned per IFUs between patient use
- Patient infection queries often not complete and signed by



# Infection Control

- Medication refrigerator temps not recorded
- OR temp/humidity logs not maintained
- Decontamination and sterilization process of dirty instruments not done according to instrument cleaning IFUs and sterilizer IFUs
- Staff can't speak to IFUs of instrument decontamination and sterilization



#### Infection Control

- IFUs not readily available
- Staff fails to disinfect surfaces between patient use
- 2 step TB not done on hire
- Infection control program not under the direction of a designated and qualified professional who has training in infection control (screen shot of Infection Control CEU modules)



# Post point / Education / CE Contact Hours / Infection Control Post point / Education / CE Contact Hours / Infection Control ICC\_2 INFECTION CONTROL - 1 CURSE DESCRIPTION INFECTION CONTROL - 1 CUENSED INFECTION CONTROL - 2 LUCENSED INFE

#### QAPI

- Fail to define and implement a QAPI program
- No annual evaluation of QAPI program
- No current QI studies performed
- Not defining quality indicators
- Peer review not done at all or never done on infections/ complications

# Medication Management

- Expired meds found in ASC
- MDVs used in patient care areas
- Syringes not labeled appropriately
- Unlicensed staff administering eye drops



### Personnel Files

- Fail to have orientation to position or competency reviews documented
- No signed job descriptions
- Annual evaluations are not done



# Available on eSupport

• eSupport/Operations/Staffing



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STAFFING: MEDICAL STAFF OVERVIEW
416.45 Condition for Coverage: Medical Staff

The medical staff of the ASC must be accountable to the governing body.
416.45(a) Standard: Membership and Clinical Privileges

Although Standarts Memorranja and Linical Privileges
Members of the medical staff must be legally and professionally qualified for the positions to which they are appointed and for the performance of privileges granted. The ASC grants privileges in accordance with recommendations from qualified medical personnel.

416.45(b) Standard: Reappraisals

Medical staff privileges must be periodically reappraised by the ASC. The scope of procedures performed in the ASC must be periodically reviewed and amended a

STAFFING

Medical Staff
Overview
Credentialing Guide
Allied Health
Professionals
Privileges
Recredentialing
Personnel File
Overview
Personnel Files

# Life Safety Code

- Fire drills not conducted quarterly
- No evaluation of drills documented
- Failure to pull fire alarm
- Pull stations are frequently obstructed
- Documentation for fire alarm testing doesn't include verification of signal transmission



# Life Safety Code

- Failure to conduct smoke detector sensitivity testing
- Failure to conduct the required annual fire alarm system testing and inspection
- Emergency lighting testing for battery operated lights consisting of 30 second testing every month and 90 minute testing annually is not documented



# Life Safety Code

- · Annual disaster drills not conducted
- No annual evaluation of CEMP
- Fail to coordinate disaster plan with state/local authorities



#### LSC Resources

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# Documentation/Medical Records

- Inconsistency in recording allergies and reactions
- Comprehensive H&Ps not on chart, not within 30 days and/ or missing pre-op assessment
- Missing documentation as to whether or not patient has an executed advanced directive
- No signatures, dates and times
- Nurses carry out orders prior to authentication of orders

#### Joint Commission

10 most frequently cited requirements based on 303 surveys

- 49% The organization reduces the risk of infections associated with medical equipment, devices, and supplies
- 48% The organization grants initial, renewed, or revised clinical privileges to individuals who are permitted by law and the organization to practice independently
- 39% The organization safely stores medications
- 35% The organization inspects, tests, and maintains medical equipment
- 34% The organization maintains fire safety equipment and fire safety building features



#### Joint Commission

- 31% The organization inspects, tests, and maintains emergency power systems
- 29% The organization manages risks related to hazardous materials and waste
- 29% The organization safely manages high-alert and hazardous medications
- 28% The organization addresses the safe use of look-alike/ sound-alike medications
- 26% The organization manages risks associated with its utility systems



# AAAHC

- Facilities and Environment
- Credentialing and Privileging
- Safe injection practices
- Documentation
- QAPI



# Facilities & Environment

• Fire drills do not include required inspection & maintenance of fire suppression systems



# Available on eSupport

• eSupport/Operations/Fire Safety



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#### FIRE SAFETY: OVERVIEW



#### AAAHC Credentialing & Privileging

- Failure to provide a comprehensive list of privileges for the provider, i.e., use of specific techniques or equipment, performance of procedures, or tasks (especially supervising others who administer anesthesia)
- Often an accurate delineation of privileges (DOP) is missing
- Privileges for specific procedures or lists haven't been updated at all
- Failure to assign a time limit to initial privileging or to meet the requirement of the ASCs own policy for reappointment
- Inappropriate credentialing and privileging
- Medical staff fails to submit an application for re-appointment
- Verification of all items with the potential to expire (license, DEA registration) is missing

# **AAAHC Peer Review**

- Peer review was not considered at the time of reappointment
- Peer review was not linked to quality improvement
- Peer review was not performed by a similarly licensed peer



# AAAHC Safe Injection Practices

- Reuse of single dose vials
- Reuse of needles and syringes
- Use of multi-dose vials in patient care areas



# - eSupport/Operations/Medication Management/Medication Safety - eSupport/Operations/Medication Management/Medication Safety - PROCRESSIVE MANAGEMENT: MEDICATION SAFETY Medication management, find properly implemented on he a hage pitient safety risk. It is important that your medication management dataris by your picious and processive. They pitient and procedure shading desired information on thory hadication management dataris by your picious and processive. They pitient safety risk it is important that your medication management dataris by our picious and MANAGEMENT MEDICATION MANAGEMENT OF CAPACE SHEET IN the local dilatorion of late of the compounding Compound

# **AAAHC** Documentation

- Documentation regarding allergies is inconsistently located in clinical records
- · "Allergies" are listed but the reactions are not
- There is reliance on "NKDA" without reference to other types of allergies/sensitivities
- Anesthesia providers fail to document anesthesia assessment/evaluation prior to surgery



#### AAAHC QAPI

- Overall QI program is not documented
- No on-going data collection processes
- No evidence of benchmarking studies
- No documentation of improvement
- No clearly stated quantitative goal
- No statement of comparison between current performance and goal
- · No reporting to the governing body



Available o	n eSuppoi	rt
eSupport/Operation     PROGRESSIVE BROCKESSIVE HOME	ons/Quality Manag	FORUM ACCOUNT
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#### Resources

- CMS surveys 2015-2016
- Joint Commission In Search of Perfection 10.11.2016
- AAAHC Quality Roadmap 2015

# Questions??

- eSupport members post to the **FORUM**
- Email your questions regarding todays' webinar to: <a href="mailto:info@pss4asc.com">info@pss4asc.com</a>

#### Join the community!

- For all the resourced referenced today and SO MUCH MORE...
- Request your free web demo today www.progressivesurgicalsolutions.com/esupport
- Email us at info@pss4asc.com
- Or call us! (855) 777-4272



# Special Year End Promotion!

- Sign up to be a member of eSupport by December 31st and receive a FREE Financial Review for your ASC.
  - Benchmark 5 ASC key performance indicators
- Tell your Surgeons THIS is all you want for Christmas: peace of mind!



#### Mark Your Calendars



January 23, 2017 11am PT/ 2am ET

QUALITY REPORTING UPDATE

Gina Thorneberry

March 20, 2017 11am PT/ 2am ET

**RISK ASSESSMENTS AND HVA** 

Debra Stinchcomb, MBA, BSN, RN, CASC

Mayle Value Calaradaya	
Mark Your Calendars	
PROGRESSIVE SURGICAL Half Time	
Friday March 3, 2017 RISK ASSESSMENTS 101	
HOW TO AVOID A DATA BRE	ACH
<i>with</i> Art Gross Karen Conduragis	<del>\$75</del>
(HIPAA Secure Now)	FREE For ALL