



Keeping you “in the know” in the ASC industry



How to Successfully Talk to ASC Surveyors

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Survey Review

- Usually every 3 years, but can be more often
- Will be unannounced but during a window, depending on Medicare vs. accreditation organization
- Surveyors can be doctors, nurses, firefighters, engineers, or pharmacists.

Do Your Homework

- Surveyors want to know that you have reviewed the regulations/standards.
- Sit with core management team to review entire manual and create a crosswalk to the policy or practice. Ensure you have covered all our bases.
- Make sure policies are organized, be familiar with the organization.
- Have a mock survey by an outside company - a third set of eyes, a different perception.

Get Your Staff Involved

- Quizzes
- Staff meetings
- Spot checks
- Audit each other

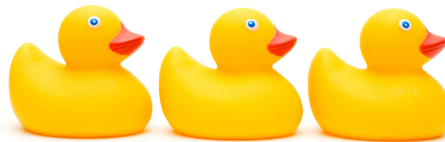


Be Confident, but not too Confident

- If you do your homework you should feel confident
- Eye contact
- Don't fumble
- Speak their language – it is in the regulations
 - Emergency Preparedness Program
 - Pre-Surgical Update
- ***Don't be afraid to push back!*** if they ask for something and you know it is not a regulation, let them know and ask them to show where it states that is required.

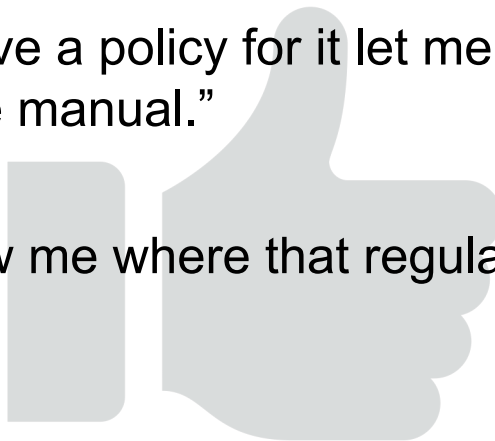
Have Your House in Order

- Personnel files, credentialing files and medical records must be organized and consistent
- Ensure all files are organized the same way
- Keep binders orderly and organized – it makes you look good.
 - Infection Control Log
 - Facility Logs
 - Meeting Minutes
 - Inservices
 - QAPI



What to Say

- “Let me go find that.”
- “I know we have a policy for it let me grab the policy and procedure manual.”
- The truth
- “Can you show me where that regulation is?”



What Not to Say

- “I don’t know”
- “I didn’t know we had to do that”
- “We don’t do that”
- Never offer anything up – only respond to exactly what they ask of you
- Keep in mind: surveyors are not your friends. They are here to find something you are doing wrong

Common Questions from Surveyors

- How often or how many hours do you spend on Infection Control?
- How often or how many hours do you spend on QAPI?
- Who over sees the operation or who has ultimate responsibility of the facility operation?
- Show me the policy on.....?
- Where is the pre-surgical update?
- Walk me through your decontamination/sterilization process?

Available on Progressive eSupport

■ Compliance/Regulations

The screenshot shows the Progressive Surgical Solutions website. The header includes the logo and navigation links: HOME, ESUPPORT, BLOG, FORUM, ACCOUNT. The main content area is titled 'REGULATIONS: CFC OVERVIEW'. It contains a paragraph about CMS revisions to ASC Conditions for Coverage in May 2009, mentioning the impact on patients and the ARRA legislation. Below the paragraph is a link: 'Medicare Conditions for Coverage and Interpretive Guidelines (Electronic Version)'. A sidebar on the right contains a search bar and a 'REGULATIONS' section with links to 'Overview', 'CFC Overview', 'CMS Memos/Documents', 'Other Memos/Documents', 'HHS Section 1557 Documents', and 'Requested Upon Arrival'.



Available on Progressive eSupport

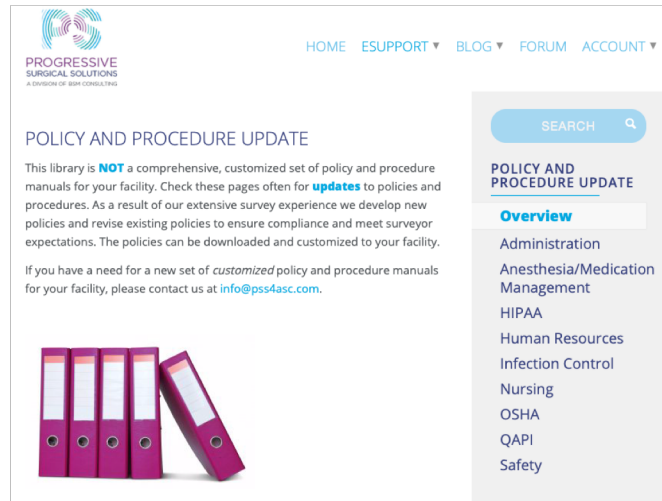
■ Resources/State and Federal/State Licensing Regulations

The screenshot shows the Progressive Surgical Solutions website. The header includes the logo and navigation links: HOME, ESUPPORT, BLOG, FORUM, ACCOUNT. The main content area is titled 'STATE LICENSING REGULATIONS'. It contains a paragraph instructing users to click on state links for licensing regulations and providing contact information for Courtney at pss4asc.com. Below the paragraph is a list of state links: Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, and Florida. A sidebar on the right contains a search bar and a 'STATE AND FEDERAL' section with links to 'State and Federal Links', 'State Licensing Regulations', and 'State ASC Associations'.



Available on Progressive eSupport

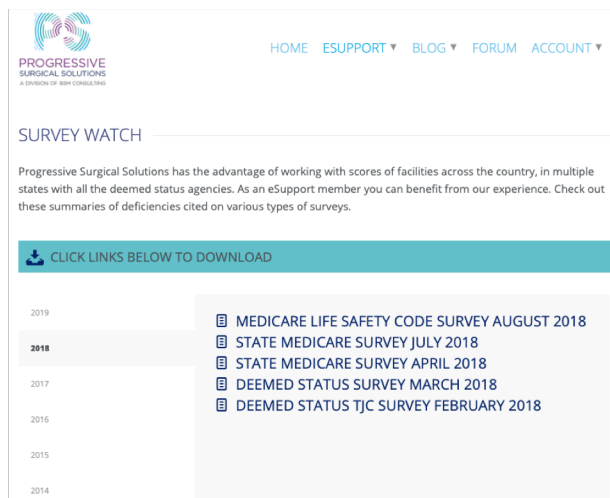
■ Compliance/Policy and Procedure Update



The screenshot shows the Progressive Surgical Solutions website. The header includes the logo and navigation links: HOME, ESUPPORT, BLOG, FORUM, ACCOUNT. The main content area is titled 'POLICY AND PROCEDURE UPDATE'. It contains a paragraph explaining that the library is a comprehensive, customized set of policy and procedure manuals for your facility, and that users should check for updates. Below this is a link to contact the company for a new set of customized policy and procedure manuals. To the right is a sidebar with a search bar and a list of categories: Overview, Administration, Anesthesia/Medication Management, HIPAA, Human Resources, Infection Control, Nursing, OSHA, QAPI, and Safety. At the bottom right is the Progressive Surgical Solutions eSupport logo.

Available on Progressive eSupport

■ Compliance/Survey Watch



The screenshot shows the Progressive Surgical Solutions website. The header includes the logo and navigation links: HOME, ESUPPORT, BLOG, FORUM, ACCOUNT. The main content area is titled 'SURVEY WATCH'. It contains a paragraph explaining that Progressive Surgical Solutions has the advantage of working with scores of facilities across the country, in multiple states with all the deemed status agencies. Below this is a link to click links below to download. To the right is a list of survey reports: MEDICARE LIFE SAFETY CODE SURVEY AUGUST 2018, STATE MEDICARE SURVEY JULY 2018, STATE MEDICARE SURVEY APRIL 2018, DEEMED STATUS SURVEY MARCH 2018, and DEEMED STATUS TJC SURVEY FEBRUARY 2018. At the bottom right is the Progressive Surgical Solutions eSupport logo.

Deemed Status AAAHC Survey: January 2019

- There is no indication or documentation of whether or not a patient has an advance directive or has requested information. By policy, the organization will accept and honor advance directives. However, it is with the stipulation that CPR will be initiated if the patient has a medical emergency.
- Fourteen of the fourteen clinical records reviewed did not contain documentation of whether or not the patient had an advance directive.
- There is a contract with an outside company that specifies the generic responsibility in regards to accounts receivable and accounts payable. Per discussions with the administrator, there are no policies and procedures provided and approved by the governing body to guide the staff for controlling accounts receivable and accounts payable and for handling cash and credit arrangements.
- There are no specified methods of collections of unpaid accounts and review before referral to the collection agency that has been approved by the governing body. The contract in place with the outside company is generic and not specific in detail.
- The immediate procedure note and final operative note was not included in fourteen of the fourteen clinical records reviewed.
- Twelve of the fourteen records included the allergies with the reactions.
- The discharge diagnosis was not documented by the operating physician.
- Fourteen of the fourteen clinical records did not contain operative reports.
- There is a written policy for recalls, but the policy does not address how staff or patients are notified.
- NFPA 101 2012 requires compliance with NFPA 70 (National Electrical Code). The following deficiencies were observed in reference NFPA 70: Electrical receptacles in the waiting room are not tamper resistant. Areas where children could frequent need tamper resistant receptacles. Access to the Electrical shut-off switch located in the "Hazardous room" was blocked. A minimum of 36 inches of clear space must be maintained in front of electrical shut offs. Area cleared prior to end of survey.
- The following rooms did not have self-closing doors: Door to the "Hazardous Storage" room

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The 2019 Webinar Line Up!

DATE		CE	WEBINAR TOPIC	SPEAKER
April 26	60 min	✓	Developing the Leaders Within Part I	Laura Baldwin Terre Thomas
May 20	20 min		Culture of Safety	Crissy Benze
June 27	60 min	✓	Developing the Leaders Within Part II	Laura Baldwin Vanessa Sindell
July 29	20 min		Cultural Sensitivity	Debra Stinchcomb
August 29	60 min	✓	Sterilization Best Practices	Phenelle Segal
September 30	20 min		Medication Shortages and How to Handle Them	Greg Tertes
October 25	60 min	✓	Documentation Best Practices	Crissy Benze
November 25	20 min		Annual Survey Watch Report	Leanne Gallegos
December 20	60 min	✓	Informed Consent	Debra Stinchcomb Will Miller

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