





Governance

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



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Operations/Contracts/Resources: Contracted Services
Assessment Tool sample

 Forest Contracts

 Nation Forest Contracts

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Credentialing/Privileging

- · Credentialing files:
 - o Not complete and/or not consistent
 - Expired licenses
 - Expired malpractice insurance or limitations are not consistent with by-laws
 - $_{\odot}\;$ Failure to reappoint physicians prior to reappointment date
 - Peer references not done at all or are doing upon reappointment instead of peer review



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Infection Control

- · Airflow could not be determined in OR's
- · 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 MD



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Infection Control continued

- Medication refrigerator temps not recorded
- OR temp/humidity logs not maintained
- No record of facility being cleaned with EPA approved disinfectant
- 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



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Infection Control continued

- 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)



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Available on Progressive eSupport Continued Education/CE Contact Hours: Infection Control Modules **eSupport** eSupport **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 not labeled with new expiration date (28 days from date of opening or expiration date printed on label, whichever is earlier) · 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
- Expired ACLS/BLS cards



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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



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Life Safety Code continued

- 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



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Life Safety Code continued

- · Annual disaster drills not conducted
- · No annual evaluation of CEMP
- Fail to coordinate disaster plan with state/local authorities
- · Holes in fire wall not sealed with fire caulking



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Documentation/Medical Records

- Inconsistency in recording allergy reactions
- Comprehensive H&Ps not on chart, not within 30 days and/ or missing pre-op assessment
- Patient rights don't include the Medicare Beneficiary Ombudsman or the link is incorrect
- 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 342 surveys

- 46% The organization grants initial, renewed, or revised clinical privileges to individuals who are permitted by law and the organization to practice independently
- 46% The organization reduces the risk of infections associated with medical equipment, devices, and supplies
- 35% The organization maintains fire safety equipment and fire safety building features
- 31% The organization manages risks associated with its utility systems
- 30% The organization safely stores medications



Joint Commission continued

- 27% The organization manages risks related to hazardous materials and waste
- 27% The organization safely manages high-alert and hazardous medications
- 26% The organization inspects, tests, and maintains emergency power systems
- 24% The organization identifies risks for acquiring and transmitting infections
- 23% The organization inspects, tests, and maintains medical equipment



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AAAHC

- Life Safety Code
- Credentialing and Privileging
- Peer Review
- QAPI
- · Clinical records/health information





AAAHC Life Safety Code

Failing to meet the operational requirements of the LSC

 CMS CfC 416.44 (b)ASC must meet the provisions applicable to Ambulatory Healthcare Centers of the 2000 edition of the Life Safety Code of the National Fire Protection Association, regardless of the number of patients served. The Director of the Office of the Federal Register has approved the NFPA 101 2000 edition of the Life Safety Code



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AAAHC Credentialing & Privileging

- Medical staff fails to submit an application for re-appointment and peer review is not a factor in the review
- Anesthesia providers and/or those supervising others who administer anesthesia have not been granted privileges to do so
- Individuals have not been granted privileges for specific procedures
- Core privileges granted without identifying what these privileges include
- Inappropriate privileging is taking place
- Failure to re-privilege at re-appointmen
- Physician Assistants (PA) are not being required to apply for privileging, and therefore do not apply for re-privileging/re-appointment
- Privileges granted without GB review/approval

CHINNOP?

AAAHC Peer Review

- Sole owners fail to engage an outside peer to REVIEW the reappointment application and credentials
- Peer review is conducted but results are not integrated into the re-privileging/re-appointment process
- Peer review for CRNAs is not conducted and therefore, not used for re-privileging/re-appointment
- Inconsistency in the application of the organization's peer review policy, especially with regard to timing of reprivileging/re-appointment



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AAAHC QAPI

 Regarding QI studies, facilities are collecting data but not reviewing it or analyzing to identify what it is actually saying about the performance



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 Operations/Quality Management/Quality Improvement Study



AAAHC Clinical Records/

- 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



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Resources

- CMS surveys 2014-2015
- Joint Commission Perspectives, September 2015, Volume 35, Issue 9
- AAAHC- AENEID 2014

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 - Email us at info@pss4asc.com
 - Or call us! (855) 777-4272



Questions??

Email your questions regarding today's content to:

info@pss4asc.com





Mark your calendars	
	Progressive Huddle January 18, 2016 11AM PT/2PM ET
Progressive EUDDLE	SOCIAL MEDIA IN THE WORKPLACE
	Edwin Boniske Higgs Fletcher & Mack
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