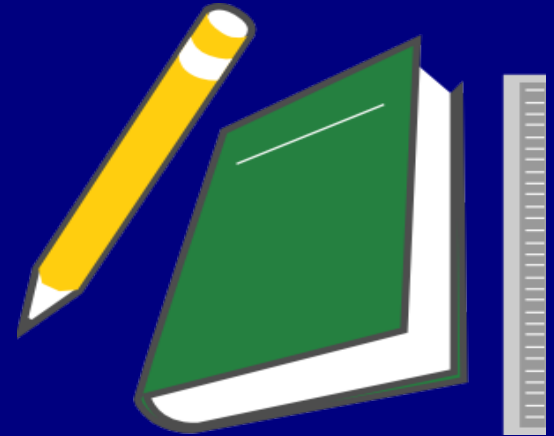


Current Survey Citations and How to Avoid Them

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Objectives

- ★ Review of the Core Survey Process
- ★ How to be Survey Ready
- ★ Common Survey Citations



CORE SURVEY PROCESS

1. "Culture of Safety" within the clinic

- Look at Adverse Events, Near Misses, Complaints from Staff and Patients
- The Clinic's Process for Reporting and Improving ANY Areas Noted to have Problems.

2. Does the Facility Address Problems

- Do You Know What Is Going on in Your Clinic?
- Are You Trying to Fix WHATEVER It Is?

Core Survey Process

3. Infection Control

- Still a Major Issue → Listed Over 20X on the Check Off Sheets for Surveyors in the Core Survey Manual

4. QAPI

- Best way for IDT to discuss incidents, identify if trends noted, implement action plans, to correct issues

5. Difference from previous survey process

- Key areas looked at and survey moves forward if no triggers are identified
- Shortens survey

So.....You May Be Asking Your Self

- ★ What are the Surveyors Looking at?
- ★ How Can my clinic be ready?

Understand & Ensure Compliance
with
CMS Conditions for Coverage
&
Interpretive Guidelines

"Play Book of Dialysis"
Tells us what we need to do
by giving us a list of **V-tags**
"requirements"

(State regulations if applicable)

Let's Look at V-tags

That You, as a Biomed,

Should Be Aware of

&

Understand

Water & Dialysate

- ★ 175 tags
- ★ Very detailed & thorough
- ★ Use RD52:2004
- ★ Separate requirements for water treatment for Home Hemo under Care at Home Condition

WATER

V176

V-tag for AAMI Water Cultures

- Done on time per state requirements
- Documentation is filed, reviewed, signed by Med Director
- Results are reviewed in QAPI, and action plan/correction is done for any items outside of range.

V178

V-tag for Water Distribution System

- Monitored monthly for bacteria/endotoxin levels
- Results signed by Medical Director and proof that anything outside of parameters is addressed appropriately and discussed in QAPI.

Water

V184

V-tag for Water and Storage Systems

- Located in a secure area that is accessible to authorized users.

V186

V-tag for Water System Alarms

- Located on the treatment floor and work properly
- Tested to make sure they work properly and no one turns them off or bypasses them.
- Loud enough to be heard over noise and not muted for longer than 3 min.

Water

V187

V-tag for Schematics of Water System

- Located in the proper place in the water room
- Components of the water system are labeled correctly with clean labels that are not torn or worn out.

V194 & V195

V-tag for Carbon Absorption Media

- Replacing exhausted carbon tanks
- Schedule for replacing tanks
- 10 min EBCT

Water

V196

V-tag for Chlorine/Chloramines Testing

- Done exactly per directions and documented correctly
- Outside of range -> report to Med Director and if ok to dialyze use the increased testing form and perform test hourly.
- Staff retrained/educated and a plan of action/correction for missed checks or inaccurate documentation

V219

V-tag for Monthly End to End disinfection

- Disinfection documented
- Problems reported to Med Director, addressed in action plan and discussed in QAPI.

Water

V226

V-tag for Bicarb and Acid Mixing Systems

- Staff properly trained prior to use
- All batches documented correctly
- Monthly audit of documentation - items identified will be addressed by a POA and discussed in QAPI.
- Notification of Med Director for problems with the mixing system

V250

V-tag for Independent Monitoring of PH/Conductivity

- Before starting the treatment of the next patient
- Appears on the Core Survey tool for surveyor to observe during machine set up.

Water

V260

V-tag for Training Staff Conducting Technical Procedures

- Trained per manufacturer recommendations
- Training specific to the functions performed (i.e., mixing, disinfection, maintenance, and repairs)
- Periodic audits to maintain operator's knowledge and skills
- Surveyor will ask for these audits/training records

V273

V-tag Corrective Action if There is a Breakthrough

- All staff knows the plan if there is a problem and the facility cannot dialyze patients.
- Medical Director made aware of any issues that arise.

PHYSICAL ENVIRONMENT

V401

V-tag for Safe Environment

- No trip hazards
- No doors open that may allow unauthorized people to enter treatment floor or water room
- Supplies stored properly
- Systems Operational including AC/Heat, plumbing, lights and emergency lights, exit lights.
- Facility noise level is low, sufficient space to maintain privacy, and a comfortable environment is provided

Physical Environment

V402

V-tag for Buildings and Building Systems

- Maintained free from defects and/or hazards to ensure safety and functionality
- Systems to assure patient safety such as method for patients to call for help from the restrooms and exam rooms.
- Access to patient treatment areas, reprocessing areas, water treatment systems, supply storage and dialysis equipment must be restricted to authorized personnel only

Physical Environment

V403

V-tag for Main Equipment Operation and Maintenance

- Call lights and alarms are all functional and string is not more than 4-6" from the floor patient bathrooms, exam rooms, and lobby
- Chairs in waiting room, treatment area, and wheel chairs must be clean and not torn or broken
- Chairs must be cleaned and disinfected
- Records maintained for any item that is repaired in the facility: blood pressure machines, scales, refrigerators, emergency generators, IV pumps, thermometers, pH cond meters etc etc.

Physical Environment

V403 (cont'd)

V-tag for Main Equipment Operation and Maintenance

- Equipment operated and maintained in accordance with manufacturer's instructions
- Malfunctioning machines awaiting repair removed from service and labeled or tagged to prevent use
- Plan for routine maintenance
- Use of "dummy" drip chambers is acceptable **only** for machine maintenance purposes and **only** for use outside of the patient treatment area.

Physical Environment cont'd

V408

V-tag for Emergency Preparedness

- Emergency plan updated annually
- Mock Code/Fire Drill evacuation for each shift of patients
- Emergency equipment working each day and available on the floor in case of an emergency: oxygen, crash cart, suction, AED, emergency meds (epi pen), blood glucose machine, D50

2014 Top 5 "Technical" Tags Sited ?

- 1. V403** The main "equipment operated and maintained..."
- 2. V260** Tag for training and auditing staff conducting technical procedures. There is an increase in citations for this since the Core Survey, where these staff practice audits are specifically asked for and reviewed. Pre-core Survey the citation rate was lower

2014 Top 5 "Technical" Tags Sited cont'd

3. **V196** Carbon/chlorine testing
4. **V250** Independent testing of dialysate pH/conductivity.
5. **V401/402** Both are usually on the citations list and they seem to be somewhat interchangeable for citations about the condition of the physical environment maintenance, and safety issues

No Matter How Hard We Try.....

Things will Happen

and

There will be incidences where we do not
meet a certain

V-tag requirement(s)

QAPI IT!!!

Scenario

Clinic X has identified that staff are not properly using the phoenix meters to test for Conductivity and pH.

- Not being completed prior to each patient treatment
- Not being calibrated each treatment day correctly

Research

Not being completed prior to each patient treatment

- V250

States: It is necessary for the operator to follow the manufacturer's instructions regarding dialysate conductivity and to measure approximate pH with an independent method before starting the treatment of the next patient.

Research

Not being calibrated each treatment day correctly

The manufacturer of the meter requires that you calibrate the meters prior to use each treatment day. You must calibrate the meters for the ranges you plan to test for

- CMS requires that staff are trained for each task they are asked to perform

The Plan

Not being completed prior to each patient treatment

- Re-educate staff to the requirements to test prior to each patient treatment
- Complete read and sign education verification for all DPC staff
- Require verification of second person that this is complete prior to treatment initiation
- Create check off box on machine set up log sheet

The Plan

Meters are not being calibrated each treatment day correctly

- Re-educate staff on how to properly calibrate their meters
- Biomed complete competency training & verifications
- Monitor staff calibrations for a period of 1 month
- Assign 2 staff members to calibrate together to ensure completion
- Prior to start of any patient treatments RN will verify calibrations are completed

Actions

After completing your plan and getting it approved at the QAPI meeting:

- Implement your plan in the clinic
- Have a plan in place to re-evaluate your work and progress.
- Re-evaluate prior to next QAPI meeting

Actions (cont'd)

Once you have implemented your plan and checked your plan for success:

- Make a permanent change in your practice

*** In this example, you evaluated the plan, and it was successful. Staff are performing all the checks prior to start of treatment and calibrating the meters properly each day.

*** Changes will be made to P and P's to reflect new process.

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*** Changes will be made to P and P's to reflect new process.

*** Ongoing monitoring

Congratulations! You corrected the problem and now are in compliance with CMS regulations!!!

Questions?

Comments?