Confidence
At Survey

Presented by, Tressa Sacrey
Director, Compliance and Education
Participants will:

- Review the ongoing compliance measurements for an RHC
- Discover helpful tools for use in the clinic
- Discuss ways to streamline processes and build confidence for your next survey
Compliance Measures
Open book test

- What test are you taking?
  - TCT, QUAD A, State
- Unannounced visit
- 100% Compliance
Open book test

- 491.1 Purpose and scope
- 491.2 Definitions
- 491.3 Certification procedures
- 491.4 Compliance with Federal, State and local laws
- 491.5 Location of clinic
- 491.6 Physical plant and environment
Open book test

– 491.7 Organizational structure
– 491.8 Staffing and staff responsibilities
– 491.9 Provision of services
– 491.10 Patient health records
– 491.11 Program evaluation
– 491.12 Emergency preparedness
Open book test

– Personnel files
– Medical records
– Documentation
  – Policy/EOP
– Entrance
– Equipment
Open book test

– Medications and supplies
– Infection control
– Laboratory services
– Safety and housekeeping
– Administration
– Postings at the clinic
Changes at the Clinic:

– Staff turnover
– New policy/protocol
– Change in equipment/supplies
– Patient/staff incident
– Patient/community feedback
– Analysis of overall program
– Analysis of drills/exercises
Changes to the Program:

- RHC Regulations (491.1-491.12)
- Interpretive guidance (App. G/Z)
- Accreditation standards (TCT/QUAD A)
- Memos/publications from CMS
- Provider Fee Schedule
- Policy changes in Washington DC
Helpful Tools
RHC Evidence Binder

- This binder allows you to keep all requested information available for quick access.
- Be sure to keep it in a safe location as it may contain confidential information.
RHC Evidence Binder

- Format and organize the binder in a manner that works best for you
- Create sections that are labeled for quick reference
RHC Evidence Binder

- Review the binder quarterly to identify items that expire or need to be updated
- Make sure key staff know where to find the binder
RHC Evidence Binder

– Certification:
  – HPSA designation
  – Final tie-in notice
  – Most recent survey results
  – Copy of CLIA
RHC Evidence Binder

- Physical plant:
  - Equipment inspection log
  - Clinic floor plan
  - Drill reports
  - Cleaning logs
  - Fire/AED/Oxygen logs
  - Environmental rounding logs
# Oxygen Tank Log

**Daily Oxygen Tank Pressure Check**

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Pressure Check</th>
<th>Signature</th>
<th>No.</th>
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**OSAH**

Sept 2011
RHC Evidence Binder

– Chart audits:
  – Collaborative audit results
  – Administrative audit results
<table>
<thead>
<tr>
<th>Collaborative Chart Audit</th>
<th>Administrative Chart Audit</th>
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<tr>
<td>Number and Frequency based on your State OR policy</td>
<td>50 or 5%, whichever is less</td>
</tr>
<tr>
<td>Medical oversight between MD/DO and NP/PA</td>
<td>Determination if required elements are being captured</td>
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<tr>
<td>Covers all APPs</td>
<td>Covers all providers</td>
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<tr>
<td>Maintain documentation as proof of compliance</td>
<td>Includes closed record(s) and feeds into program evaluation</td>
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Medical Record Review Tool
For the Month of __________ Year __________

Supervising Physician: ________________ Non-Physician Provider: ________________

If there is a concern place N and respond in Notes.

<table>
<thead>
<tr>
<th>Pt ID</th>
<th>DOS</th>
<th>H &amp; P</th>
<th>ROS</th>
<th>Meds</th>
<th>Plan/Treatment</th>
<th>Education</th>
<th>Tests Ordered</th>
<th>Notes:</th>
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Supervising Physician Signature: ________________ Date: ________________

Non-Physician provider is required to respond to EACH notation from Supervising Physician.

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<th>Pt ID</th>
<th>DOS</th>
<th>Notes/Feedback &amp; Response:</th>
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Non-Physician Signature: ________________ Date: ________________
RHC Evidence Binder

- Program evaluation:
  - Copy of meeting minutes
  - Data reports
  - Signature page
Program Evaluation Meeting Agenda

I. Review the mission and purpose of the advisory council

II. Review utilization of services
   A. Volume
      • Top diagnosis codes
      • Number of patients seen in each clinic by insurance
      • Number of patients seen by age
      • Number of patients seen by gender
      • Number of in house lab services performed
      • Number of in house x-ray performed (if applicable)
      • Number of diagnostic referrals
   B. Care of acute and chronic conditions
   C. Patient safety
   D. Coordination of care
   E. Convenience and timeliness of available services
   F. Patient satisfaction

III. Review Performance Improvement projects
   A. What project is the clinic reviewing
   B. How is the project going
   C. What is the clinic’s next area of focus

IV. Updates to overall program:
   A. Review what went well
   B. Review changes that have been implemented
   C. Review improvements needed
   D. Review clinic hours of operations
   E. Review staffing levels

V. Medical record review
   A. Review audit analysis

VI. Review policies and procedures and emergency plan
   A. Review change recommendations
   B. Give final approval
   C. Timeline for implementation
   D. Determine if policies were followed

VII. Conclusion
   A. Set future clinic goals
   B. Next steps
   C. Set date for next meeting
RHC Evidence Binder

- Staff information:
  - Organizational chart
  - Roster of staff with FTE status
  - Non-physician practitioner schedule
  - Provider CV, License, DEA, BLS
  - Clinical staff certification and BLS
Additional Binders:

- Policy manual
- Emergency plan
- Medication logs
  - Sample/Controlled Meds
- SDS sheets
- Lab controls
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<thead>
<tr>
<th>DATE</th>
<th>PATIENT NAME</th>
<th>MEDICATION</th>
<th>LOT NO.</th>
<th>DOSE</th>
<th># of SAMPLES GIVEN</th>
<th>EXP. DATE</th>
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Streamlining Processes
Helpful Tips

– Personnel files
  – Place in order of surveyor checklist

– Medical records
  – Set template to categories listed in 491.10
  – Use surveyor tool to conduct self audits
  – Review audit results with staff for additional educational opportunities
Helpful Tips

- Policy Manual
  - Do a crosswalk between surveyor checklist/Appendix G and your policy manual
  - Referral process (provider based)

- Emergency Plan
  - Create a checklist based on 491.12/Appendix Z and outline where each element is covered in your emergency plan

- Table of contents
Helpful Tips

– Physical plant
  – Make exam rooms identical
  – Limit inventory in patient care areas
  – Assign staff to various areas of the facility
  – Environmental rounding log
    – Break down by expectation in each area
  – Assign staff person to medication review
Helpful Tips

– Administrative Tasks
  – Set calendar reminders
  – Delegate tasks
  – Break tasks down to smaller increments
  – Document/organize your proof of compliance
  – Conduct mock surveys
Questions:

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