Ding, Ding, Ding... When Surveyors Come Knocking
Regina Boore, RN, BSN, MS, CASC
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Financial Disclosure
• Regina Boore is the principal of Progressive Surgical Solutions, LLC.

Objectives
• Identify frequently cited ASC survey deficiencies
• Identify effective compliance strategies
Medical Staff Credentialing
- Primary or secondary source verification
- Expired documents
- Peer review considered in the reappointment process
- CRNA credentialing

Medical Staff Credentialing

Privileging
- Updated with evolving scope of care
- Supervision of non-physician personnel
- Anesthesia administration
- Interpretation of diagnostic images

Governance
- Meeting minutes
- Annual review and approval
  - Infection control program
  - QAPI program
  - Disaster preparedness program
  - Facility contracts
  - Policies and procedures
  - Formulary
Governance
- Delegations of responsibility
- Human resources
- Medical staff credentialing
- Surgical services
- Nursing services
- Pharmaceutical services
- Laboratory services
- Physical plant management
- Medical records maintenance
- Infection control
- QAPI

Governance
- Disaster preparedness plan
- Coordination with local CERT
- Annual plan activation
- Annual activation evaluation

Surgical Services
- Anesthetic risk and evaluation preop
- Anesthetic risk and evaluation postop
Education Management
- MH, mock code drill
- MH protocol posting
- Dantrolene supply

Quality Assessment and Performance Improvement (QAPI)
- Comprehensive
- Data driven
- Facility-wide involvement and communication
- Established performance goals
- Governing Body engagement
- Internal and external benchmarking

Environment
- T/H log
- HVAC inspection and testing
- Fire alarm system inspection and testing
- Expirations/Outdates
Medical Records
- H&P current within 30 days
- H&P, comprehensive
- Patient allergies, advance directives prominent
- Allergic reactions documented and updated

Pharmaceutical
- Labeling
- Expirations
- Management of look/sound alike meds

Lab and Radiology
- Test results reviewed/signed by physician
Patient Rights
- Abuse policy/training
- Advance directive policy
- Grievance policy

Infection Control
- T/H monitoring, procedures for variance
- HVAC inspection and testing
- IC training for IC Coordinator
- IC Coordinator job description
- Staff training and education

Infection Control
- Decontamination process
- Glucometer cleaning
- Hand hygiene
- Using products per manufacturer DFUs
- IC surveillance and monitoring integrated into QAPI
- Annual inspection and testing of the HVAC system
Patient Admission, Assessment, Discharge
- Pre-surgical update
- Discharge order

Life Safety
- Activate alarm for fire drills
- Annual inspection and testing of the fire safety system
- Use of extension cords, surge protectors

Compliance Strategies
- Organization
- P&P review
- Access the referenced standards and guidelines
- Access to manufacturer DFUs
Compliance Strategies

• Staff training and education
• Infection Control
• OSHA
• QAPI
• Fire Safety
• Disaster preparedness
• HIPAA
• Patient abuse

Compliance Strategies

• GB engagement
• Staff engagement in IC and QAPI activities
• Facility-wide communication
• Job descriptions
• Orientation
• Annual competency evaluations

Thank you

• regina@ps4asc.com