

Now that you're accredited.....



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How to Stay in Compliance

You passed your survey!



Now what?

Top 5 Reasons to Stay in Compliance

- ⦿ It was a lot of work – you don't want to start from scratch!
- ⦿ Quality drives revenue (unless the CBA program goes nationwide)!
- ⦿ Your customers / patients and referral sources have gotten used to the TLC!
- ⦿ The business awareness requirements in the standards can help your company increase its profitability

Number One Reason?



All surveys are unannounced –surveyors expect to see evidence of compliance for the period of time since the last survey (yes, really – they can/will go back 2 / 3 yrs)

Basics of Continued Compliance

- ❖ Accreditation compliance is not a one time task – it is a way of doing business
- ❖ Some accreditation tasks require ongoing follow-up – some do not. Know the difference AND the frequency of documentation required / expected
- ❖ Perform a mock survey annually to ensure that your company is compliant
- ❖ Some accrediting bodies offer checklists – if yours does, use it (all the consultants do!)

General Categories of Focus

- ⦿ Administrative Ops / Leadership / Financial
- ⦿ Patient Documentation / Patient Care
- ⦿ Human Resources / Personnel and Competency

General Categories of Focus

- ⦿ Facility / Warehouse / Safety
- ⦿ Vehicles / Delivery Processes
- ⦿ Performance Improvement / Quality Improvement

Administrative / Leadership / Financial

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**“We back up our data on sticky notes because
sticky notes never crash.”**

Administrative / Leadership / Financial

- ❖ Policy and procedure updates to respond to standard changes – most challenging aspect of continued compliance!
- ❖ Review of the company's Medicare / Corp Compliance plan / BA agreements / Indie contracts
- ❖ Reimbursement / Compliance Audit - annually

Administrative / Leadership / Financial

- ⦿ Annual - Renew all state, local and FDA licenses, as applicable
- ⦿ Annual - Review all vendor contracts for compliance with current regulations
- ⦿ Annual - Complete budget for the upcoming fiscal year

Administrative / Leadership / Financial

- ⦿ Performance Evaluation of the company:
 - ⦿ Financial goals / effectiveness of fiscal policies and processes
 - ⦿ Staffing utilization and competency
 - ⦿ Business plan / Strategy / **Budget**
 - ⦿ Effectiveness of all programs and services under contractual arrangement.
- ⦿ Written! - Completed by Board of Directors or Owner

Patient Documentation / Patient Care

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“We have a VP of Records Management, but we don’t know who it is because nobody can locate the file.”

Patient Documentation / Patient Care

- ⦿ All surveys include patient documentation chart audit
- ⦿ **Focus:**
 - ⦿ Documentation that patient received “new” patient information packet (supplier standards, HIPAA, rights, etc)
 - ⦿ Proof of delivery
 - ⦿ Emergency contact information
 - ⦿ Prescription as required by FDA and reimbursement
 - ⦿ Serial number and lot number tracking – for recalls
 - ⦿ Payment responsibilities
 - ⦿ Assessment / patient education / plan of care – by product

Patient Documentation / Patient Care

- ❖ Patient follow-up completed in accordance with standards of care, and/or your company policies
 - ❖ Can be telephone or home visit
 - ❖ Documentation of function checks / maintenance as completed
 - ❖ Document compliance to prescription, as required by payer and / or standard of care
 - ❖ Document all repairs and troubleshooting
 - ❖ Document all patient / client contact
- ❖ Annual patient chart audit – highly recommended (required by some AOs)

Patient Chart Audit Checklist	Audit Date:	
Patient Name or MR number:		
Start of Care Date:		
Equipment Provided:		
	Compliant (check for yes, X for no)	Comments
1) Alternate contact on file		
2) Signed RX or CMN on file		
3) Setting, route dosage, freq, duration included as required		
4) Changes in liter flow reflected on current order		
5) Assessment / Plan of care form completed as required		
6) Proof of delivery on file, with patient co-payment responsibilities noted		
7) Documentation of New Patient Packet provided		
8) Equipment / patient follow-up completed per company policy		
9) Serial number tracking complete and accurate		
10) Oxygen lot number tracking complete and accurate		
11) Plan of Care updates completed as applicable		
12) Preventative maintenance documented and current on all rental items		
Notes:		

Human Resources / Personnel Competency



Human Resources / Personnel Competency

- ❖ Employee manual up-to-date with current company policies – evidence of receipt by employees
- ❖ Wage and hour and OSHA posters current
- ❖ Competency assessments after orientation and annually
- ❖ Observation and documentation of assessing employee in their role (may include home visit)

Human Resources / Personnel Competency

- ❖ Licensure renewal as required – may include CEU requirement
- ❖ Annual mandatory in-services, as required by your AO
- ❖ Annual employee performance evaluation
- ❖ Review job descriptions to ensure that are current / accurate

Human Resources / Personnel Competency

- Annual health screening, as required (TB testing)
- Criminal background check / Motor vehicle records check every 3 years
- Annual audit of personnel files is recommended

PERSONNEL AUDIT CHECKLIST - HME

EMPLOYEE NAME: _____ POSITION: _____

	YES	NO	COMMENTS
1) Signed job description (AS)	_____	_____	_____
2) I-9 / W4 paperwork on file (AS)	_____	_____	_____
3) Orientation outline completed signed and dated (AS)	_____	_____	_____
Annual Training (AS):			
• Emergency Preparedness	_____	_____	_____
• TB/Blood borne pathogens	_____	_____	_____
• Hazardous communication training	_____	_____	_____
• HIPAA program training	_____	_____	_____
• Medwatch	_____	_____	_____
• Safety home/environment	_____	_____	_____
• Suspected Abuse and Neglect	_____	_____	_____
4) HEPA mask training/fit test (PCS)	_____	_____	_____
5) Background check / MVR (as required) (PCS)	_____	_____	_____
6) Competency evaluations (PCS)	_____	_____	_____
7) Current professional license	_____	_____	_____
8) Supervisory visits (PCS)	_____	_____	_____
9) Performance evaluations (AS)	_____	_____	_____
10) Reference checks (2) (AS)	_____	_____	_____
11) Employee Application (AS)	_____	_____	_____
12) Emergency Contact Info (AS)	_____	_____	_____
13) TB skin test (PCS)	_____	_____	_____
14) Hepatitis vaccine/waiver (PCS)	_____	_____	_____

Note: AS= All staff / PCS= Patient care staff

Facility / Warehouse / Safety

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“According to new government safety regulations, employees must wear goggles and protective clothing when exposed to sharp criticism or cutting remarks.”

Facility / Warehouse / Safety

- ❖ Serial number and lot number tracking up-to-date and accurate – test recall system!
- ❖ Cleaning and function check logs of rental items accurate and up-to-date
- ❖ Items stored appropriately – shelving, pallets, temp controlled, expired items, clean / dirty / repair segregation, etc.

Facility / Warehouse / Safety

- ⦿ MSDS up-to-date / staff knowledgeable
- ⦿ Annual fire drill - documented
- ⦿ Annual simulation of emergency plan / staff knowledgeable - documented
- ⦿ Vehicle inspections and maintenance records up-to-date

Facility / Warehouse / Safety

- ⦿ Annual safety survey:
 - ⦿ Office space – adequate space, ventilation, wiring
 - ⦿ Outside / parking area – well lit, handicap accessible
 - ⦿ Warehouse – all required safety items available
 - ⦿ Vehicle – all required safety items available
- ⦿ Document with checklist – include review in Performance Improvement meeting minutes

MEASURE	Yes	No	N/A
Medical Storage			
Is their clear storage space with a gap of 18 inches from the ceiling?			
Are shelf items stored in a manner to protect packaging integrity?			
Is equipment bagged and tagged or draped, ready for customer use?			
Is there a designated person assigned to maintain an appropriate inventory of items?			
Are prescription items stored in an area with limited access?			
Is the medical storage area adequate?			
Is the medical storage area clean and organized?			
Are shelves secure?			
Is there an adequate supply of PPE that includes:			
• Masks (both regular masks and HEPA masks)			
• Gloves (latex, non-powdered and vinyl)			
• Gowns			
• Face shields			
• Alcohol hand cleaner			
Are heavy items stored on lower shelves?			
Are hand washing signs in place in rest rooms?			
Are dated items within 3 months of listed expiration dates?			
Aggregate Section Score: _____			
Comments: _____			

MEASURE	Yes	No	N/A
Delivery Vehicle Safety			
Are daily vehicle inspection reports complete?			
Are tire rotation and oil changes performed per policy (every 3K to 7K miles)			
Are eyewash and first aid kits accessible and secure?			
Are oxygen and other gas cylinders or liquid vessels properly secured?			
Is clean equipment secured and segregated from dirty/bagged and tagged?			
Is equipment secured with nylon straps?			
Are fire extinguishers accessible and mounted?			
Are PPE and/or infection control kits present			
Is there a bulkhead present and intact?			
Are No Smoking signs visible inside and out (20 ft.)			
Are appropriate DOT warning placards and number decals in place? (LOX)			

Performance Improvement / Quality Improvement

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“You see clutter. I see an environment that encourages the random juxtaposition of disparate elements for the potential generation of creativity born of chaos!”

Performance Improvement / Quality Improvement

- ❖ Biggest accreditation bang for your buck – real potential to use PI requirements to improve performance of the company
- ❖ Some AOs require quarterly data collection / aggregation / reporting– others do not specify or require annual report
- ❖ New standard requires referral source and employee feedback on performance of company and process

Mandatory PI Indicators to Measure

- ⦿ Customer satisfaction questionnaires
- ⦿ Customer complaint logs – response time
- ⦿ Incident reports and sentinel event documentation
- ⦿ Access to or beneficiary quality of care
- ⦿ Medicare billing errors / compliance to laws

Final Tips for Continued Compliance

- ❖ Teamwork – assign follow-up according to employee roles within your company
- ❖ Assign an “accreditation manager” to oversee continued follow-up
- ❖ Complete an annual mock survey
- ❖ Some companies may find it more cost effective to outsource certain aspects of continued compliance

Services Offered



- **Continuous Accreditation Compliance Program™**
- **Accreditation Preparation / Policy and Procedure manuals**
- **Competitive Bid Preparation**
- **Process Assessment (Reimbursement & Operations)**
- **HME Start-ups**

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