

UofL

Governance Organize to Maximize Effectiveness



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Governing Body



Full legal authority and responsibility

- Designating CEO or administrator
- Adequate number of staff
- Medical staff appointments
- Furnishing services
- Internal grievance process
- Involuntary discharge and transfer policies
- Emergency coverage
- Furnishing data for ESRD program administration

Chief Executive Officer or Administrator

Responsible for management of the facility
and provision of all dialysis services

- Staff appointments
- Fiscal operations
- Relationship with the ESRD networks
- Allocation of staff and resources for QAPI

Adequate Number of Qualified and Trained Staff



**Adequate number of qualified personnel present
whenever patients on dialysis**

- appropriate patient/staff ratio
- meets the needs of patients
- registered nurse, social worker and dietitian
adequate to meet patient clinical needs

Registered nurse present in the facility at all times

All staff have appropriate orientation

All employees have opportunity for CE

Medical Staff Appointments

Responsible for all medical staff appointments and credentialing in accordance with State law

- Attending physicians
- PAs
- NPs
- Clinical nurse specialists

All medical staff informed of facility policies

Communicates expectations to medical staff

- participation in improving quality of medical care



Governing Body

- Dialysis facility furnishes services directly on its main premises
- Premises contiguous with the main premises
- Are under direction of the same professional staff and governing body as the main premises

Internal Grievance Process



Patient may file an oral or written grievance

- Without reprisal or denial of services
- Clearly explained procedure for submission
- Timeframes for reviewing the grievance
- Description of how patient or patient's representative will be informed of steps taken to resolve grievance

Involuntary Discharge and Transfer

Medical Director ensures no patient is discharged or transferred from facility unless

- Patient or payer no longer reimburse facility
- Facility ceases to operate
- Transfer is necessary for patient's welfare
 - facility can no longer meet patient's needs
- Patient's behavior is disruptive and abusive
 - delivery of care or the ability of the facility to operate effectively seriously impaired

Involuntary Discharge from Facility

Medical Director ensures that interdisciplinary team

- Documents reassessments
- Efforts made to resolve problems
- Provides patient and ESRD Network with 30-day notice of planned discharge
- Obtains written physician's order
 - signed by both medical director and patient's physician concurring with discharge or transfer

Involuntary Discharge from Facility

Medical Director ensures that interdisciplinary team

- Contacts another facility
- Attempts to place patient there
- Documents the effort
- Notifies State survey agency of involuntary transfer or discharge
- If immediate, severe threats to health and safety of others
 - May utilize abbreviated involuntary discharge procedure.

Emergency Coverage



Dialysis facility must provide patients and staff with written instructions for obtaining emergency medical care

- Roster with names of physicians, when and how to call.
- Agreement with hospital that can provide inpatient care, routine and emergency dialysis 24 / 7.

Data and Information for ESRD Program



Facility must furnish data and information to CMS

- Intervals as specified by the Secretary.
- Used in a national ESRD information system
- Compilations relevant to program administration
 - Claims processing
 - Reimbursement
 - Performance assessment
 - Quality improvement

Data and Information for ESRD Program

Facility must furnish data and information to CMS

- Submitted electronically in the format specified by the Secretary
 - Cost reports
 - ESRD administrative forms
 - Patient survival information
 - Existing ESRD clinical performance measures
 - Any future clinical performance standards

ESRD Network



Governing body receives and acts upon recommendations

- Facility cooperates with the Network activities
- Outlined in Network's current statement of work.
- Facility participates in ESRD network activities and pursues network goals.



Conclusions

- The Conditions for Coverage outline specific responsibilities for dialysis unit governance
- Accomplished through the establishment of a governing body
- Essentially responsible for implementing all of the Conditions