



Survey & Certification Issues

Judith Kari &
Glenda Payne



Objectives

- Discuss the legal authorities and guidance documents that govern ESRD S&C
- Describe components of ESRD surveys
- Discuss relationship with ESRD Networks
- Delineate survey tools
- Review waivers



The ESRD Benefit

- PL 92-603: ESRD Benefit
 - Outpatient dialysis (hospital-based, independent)
 - Home training and support
 - Transplant (separate S&C program)
- Not included in ESRD Benefit
 - Acute/inpatient dialysis (hospital benefit)
 - CKD stages 1-4



ESRD S&C Program

- Initial certification survey
 - ESRD initials have priority
- Survey for change in service
- Recertification survey (focused & random)
- Complaint survey



MPD: Mission & Priority Document

- Published annually
- Guidance for workload for State Agencies
 - Establishes priorities for surveys (tier structure)
 - Failure to meet the priorities outlined may = nonperformance deductions for State Agencies
- Copy of ESRD portion in Student Manual



Initial Approvals

- All requirements must be completed before the RO can recommend certification
 - 855 approval
 - Successful completion of survey
- **BE SURE** you have an approved 855 before you do the initial survey!



Changes

- Change in # stations: on-site survey not required by CMS; may be required by state; use CMS 3427 to notify CMS
- Change in services:
 - Must file a CMS 3427 for addition of home dialysis (hemodialysis or PD), addition of reuse, or support for dialysis in LTC
 - May require an onsite survey
- Change in location:
 - Must file a CMS 3427
 - Requires an onsite survey



Survey & Certification Issues

Questions?



STAR Survey Software

- Guides the ESRD Survey Process
- CMS expects all states to be moving towards using STAR for all ESRD surveys
- STAR program is being updated to new regs



Clicker Question!!!

- o Question: Have you attended a STAR training workshop?
 - A. Yes
 - B. No
 - C. I don't work for a state



Clicker Question!!!

- o Question: Have you used STAR for an ESRD survey?
 - A. Not yet (but I have attended training..)
 - B. Once
 - C. More than 5 times
 - D. Haven't attended training
 - E. I don't work for a state



ESRD Survey Types

Basic Survey

- Use the outline of the ESRD Survey Process
 - May expand portions if needed to gather more information in specific areas when required by findings



Use Decision Making to Determine if Additional Activities Are Needed

When Condition level deficiencies are suspected:

- Review P&P in areas of concern;
- Interview additional involved staff;
- Review Governing Body minutes / other administrative documents; or
- Expand the patient sample for specific areas of concern.



Focused ESRD Surveys

- Initials
- Complaints
- Relocations
- Change in services



Nursing Home Dialysis

- Current guidance based on previous ESRD CfC
- Will be developing new S&C letter
- Plan to develop additional regulation for Nursing Home Dialysis



Temporary Closure

Why:

- Remodeling: more likely to be planned
- Repair: might be immediate, e.g., post hurricane
- Regrouping: in response to safety issues



Temporary Closure

- Facility must provide notice to State Agency to include:
 - Reason
 - Expected time to be closed (greater than 6 months should be rare)
 - Provision for patient treatment during the closure; patients must be transferred
 - Communication of any change to the timeline
 - Notice of intended reopening date
- State should periodically determine progress
- State should use CMS 3427 “Remarks” to communicate with CMS



Relationship with Networks

- Partnerships
 - QAPI
 - Involuntary discharge
 - Emergency preparedness
- Shared goals
 - Use of data to improve patient outcomes
 - Resolution of complaints & grievances



ESRD Survey Tools

- Interpretive Guidance
- Measures Assessment Tool (MAT)
- Outline of Basic ESRD Survey Process
- STAR software
- Data reports



Data Reports

- Dialysis Facility Reports
 - Will conform to new regulations
 - Will expand to include CROWNWeb data
 - Moving to web-based reports
- Outcomes List
 - Confidential list for State use only
 - Dictates selection of facilities for focused review (Tier 2 workload)



ESRD Life Safety Code Surveys

- LSC: 2000 NFPA rules for ambulatory health facilities, except for the requirement for an essential electrical system (EES)
- May be conducted by State LSC experts or local fire marshals, dependent on state decision
- Beginning Feb 9, 2009, all initials will require a successful completion of a LSC survey prior to certification
- LSC surveys may be done separately from ESRD surveys



Waivers

- Isolation station for Hepatitis B+ (HBV+) patients
- Life Safety Codes (LSCs)
 - Use the State code in lieu of LSCs
 - Facility exceptions for specific requirement(s) that cause “unreasonable hardship”
- Qualifications of the medical director



Survey and Certification Issues

Questions??