



**ESRD Update:
Transitioning to New ESRD Conditions for Coverage
Student Manual**

Lesson #2: Transitioning to New Conditions for Coverage

Learning Objectives

At the conclusion of this lesson, you will be able to describe the:

- Background & rationale for changes to the current ESRD Conditions
- Structure of the new Conditions
- Structure of the new survey process
- Structure of this training

Transitioning to New Conditions for Coverage

Judith Kari

1

Objectives

- Background & rationale for changes to the current ESRD Conditions
- Structure of the new Conditions
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2

1976 Memories



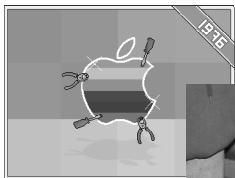
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1976 Memories



4

1976 Memories



5

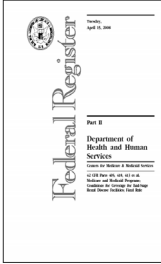
History

1972	PL 92-603 extended Medicare to workers & their spouses & children needing dialysis or transplant
1973-1976	Interim regulations
1976	Publication of <i>Conditions for Coverage for ESRD Services</i>
1970s-1990s	Technical updates
1994	Community Forum began rewrites
2005	Publication of proposed Conditions for Coverage for dialysis (transplant separate)

6

History (cont.)

10-2007	Draft Interpretive Guidelines emailed to 10,000 on CMS listservs seeking comment
12-2007	CMS invited >120 patients, professionals & others to Community Forum to solicit IG comments
4-15-2008	Publication of <i>Conditions for Coverage for End-Stage Renal Disease Facilities; Final Rule (CfC)</i>



<http://edocket.access.gpo.gov/2008/pdf/08-1102.pdf>

7

Rationale for ESRD Regulation Changes

- Increasing realization of the need for regulatory support for an outcomes focus across provider types
 - Needed to drive improvements in care
 - Important component for bundled reimbursement (Medicare Improvements for Patients and Providers Act 2008)

8

More Reasons

- Changes in technology
 - Water & dialysate services are more complex today
 - Changes in dialysis equipment
- Differences in care delivery
 - 1970's: few technicians; regulations are silent
 - 2008: technicians provide most direct care & public is demanding regulation

9

Even More Reasons

- Evidence based practice: ESRD community coming to consensus on minimum standards of care
 - RPA's Adequacy of Dialysis Report
 - NKF KDOQI Guidelines
 - Fistula First Breakthrough Initiative
- QAPI: accepted process of self-assessment across provider types
- Electronic data submission required to keep pace with growing ESRD population & need for current data

10

Key Effective Dates

Posting Draft Interpretive Guidance	8-08
Surveyor Training on New Survey	9-08
Open Door Forum on New Survey	9-18-08
Conditions for Coverage effective	10-14-08
ASPEN Survey IT Infrastructure complete	1-8-09

11

Key Effective Dates

CROWNWeb to begin collecting data	2-1-09
Life Safety Code provisions effective	2-9-09
Separate isolation room (new facilities)	2-9-09
State or national certification of current patient care technicians required	4-15-10
Technicians hired after 10-14-08 must have state or national certification	18 months from hire date

12

New Rules Require New Data Infrastructures

- The Survey & Certification data system (ASPEN) must be updated
- The automated ESRD data software (STAR) must be updated

13

New Conditions Require New Interpretive Guidance

- Interpretive Guidance (IG) is CMS' interpretation of the Conditions
- Provides clarification to surveyors & providers

14

New Rules Require New & Updated Products

- New Survey Protocol
- New training courses for surveyors
- New training materials for courses
- Updated Frequently Asked Questions
- Updated communications websites

15

Structure of New Conditions

Part A: General

- Compliance: state/local “adjudicated”

Part B: Patient Safety

- Infection control
- Water/dialysate
- Reuse
- Physical environment

16

Structure (cont.)

Part C: Patient Care

- Patients’ rights
- Patient assessment
- Patient plan of care
- Care at home
- QAPI
- Special purpose dialysis facilities
- Laboratory services

17

More structure

Part D: Administration

- Personnel
- Medical director responsibilities
- Medical records
- Governance

18

Survey Structure

- The new ESRD survey process covers the new Conditions
- The Life Safety Code survey is separate from the ESRD survey

19

This Training

- Unique ESRD course: transition
 - Review new Conditions
 - Describe new survey tasks
 - Describe major changes
 - Introduce new survey documents, tools, and resources

20

Course Materials

- Laminates
 - Outline of the Survey Process
 - Measures Assessment Tool (MAT)
 - Tag Identifier List
 - Dialysis Labs At-a-Glance
 - Personnel Qualifications Grid
 - Water System Monitoring & Decision Tree
 - Principles of Documentation

21

Training Materials

- Conditions for Coverage (Regulations and Preamble)
- Interpretive Guidance (IG)
- Tools: Worksheets, Guides
- Crosswalk from old to new tags
- Information: CPMs, KCER, DFRs, CROWNWeb, etc.

22

Getting to Know One Another

23

ESRD Updates

- Stand up if you have ever attended an ESRD Update

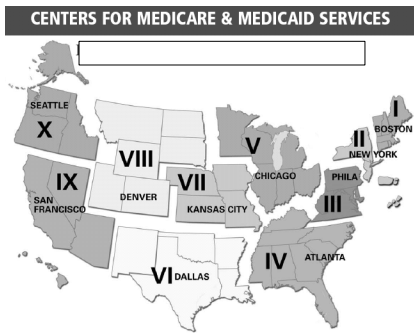
24

Clicker Questions!!!

- Will use the Audience Response System during this training
- Sample question:
This session is being presented today in:
A. Dallas, TX
B. Cherry Hill, NJ
C. Paris France

25

Clicker Question!!! What Region (1-10) are you from?



26

Clicker Question!!!

- My professional discipline is...
- A. Registered Nurse
 - B. Social Worker
 - C. Dietitian
 - D. Medical Technologist
 - E. LSC Specialist/Engineer
 - F. Physician
 - G. Pharmacist
 - H. Generalist/Sanitarian
 - I. Other

27

Clicker Question!!!

What is your role in the survey process?

- I am a state surveyor
- I am a state manager
- I work for CMS
- I work for a Network
- I work for a Provider
- None of the above

28

Clicker Question!!!

How many dialysis surveys have you done in the last 12 months?

- A. None
- B. 1-5
- C. 6-10
- D. 11-15
- E. 16-20
- F. >20
- F. I am not a surveyor

29

Clicker Question!!!

When doing an ESRD survey..

- A. I am usually working alone
- B. I am usually part of a team
- C. Not applicable to me

30

Transition Team

- Kelly Frank, IA
- Rosemarie Miller, NY
- Teri Spencer, CA
- Bonnie Greenspan, Consultant
- Beth Witten, Consultant
- Glenda Payne, CMS
- Judith Kari, CMS

31

Question Box

- Will have time for questions in each session
- If questions are not answered, put them in the question box!
- We may also ask you to put some questions in so we can capture them for the future!

32

Transitioning
to
Using the ESRD Survey Process

33
