Updates to Survey Process and Standards for ASCs
March 3, 2015

Presented by:

Pearl Darling
MBA
Senior Business Development Specialist
Ambulatory Care

Daniel J Ross
MD, DDS, FACEP
Field Director
Surveyor Management & Development

Joyce Webb
RN, MBA
Project Director
Division of Healthcare Quality Evaluation
Agenda

- Accreditation for ASCs
  - ASC Vs Office-Based Surgery (OBS)
  - ASC eligibility requirements
  - Survey Options for ASCs – Non-deemed and Deemed

- ASC Surveyor Complement Changes
  - Who it Affects and Why the Change
  - Role of Life Safety Code (LCS) Specialist

- New ASC Standards
  - Sample survey agendas
  - Review of Standards Changes

- Resources

- Your Questions!
Accreditation for ASCs

Pearl Darling
Senior Business Development Specialist
Ambulatory Care Accreditation Program
Purpose of Accreditation

Why Accreditation?

- Validate quality of care; engage staff & patients
- Reinforce risk management efforts
- Gateway to other ‘recognitions’ (deemed status)
- Strengthen your presence in managed care networks
- Possible discounts on liability insurance
- Helps meet certain states’ regulatory requirements
Key Differences: OBS vs. ASC

**OBS**
- N/A for Medicare Deemed Status
- Business Occupancy
- Serve 3 patients with 1 active at the time of survey
- 1 Day Survey
- See complete list of OBS eligibility requirements

**ASC**
- Medicare Deemed Status
- Business or Ambulatory Health Care Occupancy
- Serve 10 patients with 2 active at the time of survey
- Minimum of 2 Survey Days

*Note: LSC added for ASCs with Ambulatory Health Care Occupancy*
Accreditation for ASCs

Ambulatory Care Eligibility Requirements

*Effective July 1, 2014*

- Facility license or registration, if required by law
- 10 patients served, with at least two active at the time of survey
- Identifies health care services it provides, and which are provided directly, under contract, or through other arrangement
- See complete list of [ambulatory care eligibility requirements](#)
Accreditation for ASCs

**Ambulatory Surgery Centers**
- Accrediting ASCs since 1976
- Over 900 Accredited ASCs
- ASC Deeming Authority since 1996
  - CMS determined that The Joint Commission’s standards and survey process meet or exceed those established by CMS
  - ASCs accredited by The Joint Commission are eligible to be recognized by CMS for participation in the Medicare and Medicaid programs

**Effective December 20, 2014 through December 20, 2020, CMS Renews Joint Commission Deeming Authority for Ambulatory Surgery Centers**
Follow the 5 Steps to Deemed Status

1. **Step 1: Licensing Requirements**
   - Check with your state agency regarding licensing requirements for ambulatory surgery centers.

2. **Step 2: 855B Application**
   - The *855B Medicare Enrollment Form must be completed, submitted, and accepted* by your Medicare contractor prior to scheduling a deemed status survey.

3. **Step 3: Complete Accreditation Application**
   - Notify The Joint Commission of your intent to seek CMS deemed status. This also determines the type and length of your survey.

4. **Step 4: Know expectations of The Joint Commission and CMS**
   - Review Ambulatory Care Standards.
   - Survey Activity Guide

5. **Step 5: Prepare for Accreditation**
ASC Surveyor Complement Changes

Daniel J Ross, Field Director
Surveyor Management & Development
ASC Surveyor Complement Changes

A LSC Surveyor will be added to:
- All deemed ASCs
- All non-deemed ASCs with ambulatory occupancy

A LSC Surveyor will NOT be added to:
- ASCs with business occupancy
  - only have three or fewer individuals at the same time, who are either rendered incapable of self-preservation in an emergency or are undergoing general anesthesia
## ASC Complement Changes

<table>
<thead>
<tr>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>CLINICIAN</td>
<td>CLINICIAN</td>
<td></td>
</tr>
</tbody>
</table>

A.
ASC Complement Changes

Day 1        Day 2        Day 3

A. CLINICIAN  CLINICIAN  CLINICIAN

B. CLINICIAN  CLINICIAN  CLINICIAN
ASC Complement Changes

Day 1                    Day 2                    Day 3

A. CLINICIAN             CLINICIAN             CLINICIAN

B. CLINICIAN             CLINICIAN             CLINICIAN

C. CLINICIAN             CLINICIAN             CLINICIAN
ASC Complement Changes

Day 1

A. CLINICIAN

B. CLINICIAN

C. CLINICIAN

Day 2

A. CLINICIAN

B. CLINICIAN

C. CLINICIAN

Day 3

A. CLINICIAN

B. CLINICIAN

C. CLINICIAN

LSCS
ASC Complement Changes

Day 1  Day 2  Day 3

A.  CLINICIAN  CLINICIAN  CLINICIAN

B.  CLINICIAN  CLINICIAN  CLINICIAN

C.  CLINICIAN  CLINICIAN  CLINICIAN

LSCS
ASC Complement Changes

Day 1                    Day 2                    Day 3

A. CLINICIAN            CLINICIAN

B. CLINICIAN            CLINICIAN            CLINICIAN

C. CLINICIAN            CLINICIAN            CLINICIAN

LSCS
ASC Surveyor Complement Changes

SURVEY TEAM

CLINICIAN

LSC Surveyor
ASC Surveyor Complement Changes

Why the Change?

- Enhanced customer service
- Enhanced risk identification
- Improved patient safety
- Improved regulatory compliance
- Improved surveyor education
- More efficient survey process
- Alignment with our mission
ASC Surveyor Complement Changes

LSC Surveyor Role

- Document Review
- Building Tour and Assessment
- Environment of Care System Tracer
- Emergency Management System Tracer
- Education, consultation, team support
- Special issue resolution
- Document findings
- Interim exit
ASC Surveyor Complement Changes

ASC challenges and limitations

– Manpower and oversight of LSC
– Infrastructure and property
– Time
– Documents
ASC challenges and limitations:

- Manpower and oversight of LSC
- Infrastructure and property
- Time
- Documents
ASC Surveyor Complement Changes

- LSC Surveyor Impact on Survey Process
  - Collaboration and team work
    - Arrival
    - Defer to expert
  - LSC surveyor responsible for their findings
    - HCO clarifications
  - LSC surveyor responsible for documentation
    - Report out and lock report at exit
ASC Surveyor Complement Changes

More Information
- Perspectives article
- Environment of Care News article
- Planned Webinars
Overview of Standards and Survey Process Changes for ASCs

Joyce Webb, Project Director
Department of Standards and Survey Methods
## Sample On-site Survey Agenda
### Clinician

### Day One

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00 – 9:00</td>
<td>Surveyor Arrival and Preliminary Planning</td>
</tr>
<tr>
<td>9:00 – 10:30</td>
<td>Opening Conference and Orientation to Organization</td>
</tr>
<tr>
<td>10:00 – 10:30</td>
<td>Continued Surveyor Planning Session</td>
</tr>
<tr>
<td>10:30 – 12:30</td>
<td>Individual Tracer Activity</td>
</tr>
<tr>
<td>12:30 – 1:00</td>
<td>Surveyor Lunch</td>
</tr>
<tr>
<td>1:00 – 2:30</td>
<td>Individual Tracer Activity</td>
</tr>
<tr>
<td>2:30 – 3:30</td>
<td>System Tracer – Data Management/Individual Tracer Activity</td>
</tr>
<tr>
<td>3:30 – 4:00</td>
<td>Special Issue Resolution or Interim Exit Conference with Life Safety Code Surveyor</td>
</tr>
<tr>
<td>4:00 – 4:30</td>
<td>Surveyor Team Meeting/Planning Session</td>
</tr>
</tbody>
</table>

### Day Two

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00 – 8:30</td>
<td>Daily Briefing</td>
</tr>
<tr>
<td>8:30 – 9:00</td>
<td>Leadership Session</td>
</tr>
<tr>
<td>9:00 – 9:30</td>
<td></td>
</tr>
<tr>
<td>9:30 – 12:30</td>
<td>Individual Tracer Activity</td>
</tr>
<tr>
<td>12:30 – 1:00</td>
<td>Surveyor Lunch</td>
</tr>
<tr>
<td>1:00 – 1:30</td>
<td>Competence Assessment and Credentialing/Privileging/Individual Tracer Activity</td>
</tr>
<tr>
<td>1:30 – 2:00</td>
<td></td>
</tr>
<tr>
<td>2:00 – 3:30</td>
<td>Surveyor Report Preparation</td>
</tr>
<tr>
<td>3:30 – 4:00</td>
<td>CEO Exit Briefing and Organization Exit Conference</td>
</tr>
<tr>
<td>4:00 – 4:30</td>
<td></td>
</tr>
</tbody>
</table>
# Sample On-site Survey Agenda

## Life Safety Code Surveyor

<table>
<thead>
<tr>
<th>Arrival first day of ASC survey</th>
<th>Arrival mid-ASC Survey</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00 – 9:00 a.m.</td>
<td>Surveyor Arrival and Preliminary Planning Session</td>
</tr>
<tr>
<td>9:00 – 9:30</td>
<td>Opening Conference and Orientation to Organization</td>
</tr>
<tr>
<td>9:30 – 10:00</td>
<td>Life Safety Code® Building Assessment • Building Tour • Document Review</td>
</tr>
<tr>
<td>12:00 – 12:30</td>
<td>Surveyor Lunch</td>
</tr>
<tr>
<td>12:30 – 1:00</td>
<td>Life Safety Code® Building Assessment, continued</td>
</tr>
<tr>
<td>1:00 – 1:30</td>
<td>Environment of Care and Emergency Management</td>
</tr>
<tr>
<td>1:30 – 2:00</td>
<td></td>
</tr>
<tr>
<td>2:00 – 2:30</td>
<td>Special Issue Resolution</td>
</tr>
<tr>
<td>3:30 – 4:00</td>
<td>Interim Exit Conference</td>
</tr>
<tr>
<td>4:00 – 4:30</td>
<td>Surveyor Team Meeting* / Planning Session</td>
</tr>
</tbody>
</table>
Standards Changes for ASCs

Why were these changes made?

- To align with CMS regulatory language…
- To clarify expectations for compliance…
- To add specificity…
- To update links and references…
Standards Changes for ASCs

Revised Standards

- Staff education on fire response plan (HR.01.05.03 EP 1)
- Use of nationally-recognized infection control guidelines (IC.01.05.01 EP 1)
- HIPAA compliance (IM.02.01.01 & IM.02.01.03)
- Radiologic services ordered by authorized practitioners (PC.02.01.03 EP 1)
- Radiologic services must be integral to procedures offered by the ASC (PC.02.02.01 EP 15)
- Medical records (including images and films) must be retained for at least 5 years (RC.01.05.01 EP1)

**f.y.i.**, Items in red refer to specific standards. For example, (IC.01.05.01 EP 1) is referring to Infection Control (IC) Chapter, Standard #01.05.01, Element of Performance (EP) #1.
Standards Changes for ASCs

Revised Standards Cont’d

- Applicability to sample medications (MM chapter- multiple EPs)
- Advance directives must be placed in a “prominent place” in the clinical record (RC.02.01.01 EP 4)
- Pre-op test results must be in the clinical record prior to the start of the surgical procedure (RC.02.01.03 EP 4)

Deemed ASCs – Are no longer required to comply with all of CMS’ hospital requirements at CoP 482.26
Standards Changes for ASCs

New Standards!

- Governing body responsibilities for oversight of:
  - Policy development and implementation (LD.01.03.01 EP 22)
  - Performance improvement (LD.01.03.01 EP 22 & LD.04.04.01 EP 26)
  - Non-physician practitioners (LD.04.01.07 EP 10)
- Use of a Medicare-certified lab (LD.04.01.01 EP 19)
- Oversight of radiologic services – no longer limited to radiologist (LD.04.01.05 EP 13)
- Policies on types of emergency equipment avail to Ors (LD.04.01.11 EP 8)
- Focus of PI activities (LD.04.04.05 EP 6 & PI.03.01.01 EP 12)
Standards Changes for ASCs

Environment of Care

- Radiation exposure badge monitoring (EC.02.02.01 EP 14)
- Managing ionizing radiation hazards (EC.02.02.01 EP 15)
- Fire response plan – copy with telephone operator or security (EC.02.03.01 EP 9)
- Fire drills held at varied times and conditions (EC.02.03.03 EP 3)
- Medical equipment inventory (EC.02.04.01 EP 2)
- Equipment and utility system maintenance in accord with manufacturer’s guidelines (EC.02.04.01 EP 3 & EC.02.05.01 EP 3)
- Testing of battery-powered egress lights (EC.02.05.07 EP 2)
- Ventilation, temperature, and humidity provided in accord with ASHRAE standards (EC.02.05.01 EP 4)
Standards Changes for ASCs

Life Safety Code Standards Changes?

- Several EPs at LS .03.01.30 were revised to update the NFPA reference
- No other changes to these requirements or expectations for compliance
Resources

**Accredited Customers**
Dedicated Account Executive or 630.792.3007
- Confirm survey agenda complement
- Answer specific survey process questions

**New Applicants**
Pearl Darling, Senior Business Development Specialist
630.792.5215 - pdarling2@jointcommission.org
- Confirm eligibility requirements
- Provide application access

**Standards Interpretation Group/Engineering Department**
630.792.5900, option 3 or submit an online question
www.jointcommission.org/Standards
- Standards-related inquiries

**Ambulatory Care Website**  www.jointcommission.org/AHCProgram
- Pricing Worksheets
- Survey Activity Guide
Questions?