MISSION POSSIBLE: A TEAM APPROACH TOWARDS COMPLIANCE, CASE MANAGEMENT, AND QUALITY

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APRIL 27, 2018

OBJECTIVES

• PRACTICAL GUIDANCE FOR INCORPORATING COMPLIANCE INTO OPERATIONAL PROCESSES
• STRATEGIES FOR SHIFTING FROM AN EXTERNAL, REGULATORY FOCUS TO INTERNAL ALIGNMENT
• LEVERAGING TECHNOLOGY AND DATA TO EFFECT CHANGE

COMPLIANCE

• DEPENDENCE ON THOSE DOING THE WORK ON THE FOREFRONT THAT MAINTAINS THE ORGANIZATION’S COMPLIANCE WITH RULES & REGULATIONS
• DISCUSSION OF SCENARIOS HIGHLIGHTING THE IMPORTANCE OF CASE MANAGEMENT, QUALITY & COMPLIANCE.
  * 2 MIDNIGHT RULE
  * REPORTING A CONCERN/CULTURE
  * COMPLIANCE & REGULATORY COMMITTEE
Healthcare is "compliant" if...

1. Meets quality standards;
2. Is medically necessary;
3. Is provided by qualified physicians and staff;
4. Is provided without improper financial incentives;
5. Is provided in a way that respects patient's rights;
6. Is provided in an approved facility;
7. Is reimbursed correctly;
8. Is documented, charged, and billed correctly.

Scenario One
2 Midnight Rule & Medical Necessity

Katie Schmaltz, RN, ACM, Director of Case Management, Acadia General Hospital

2 Midnight Rule Scenario

* Admission Orders
* Documents
* Adults
* Key Players Working Together
UTILIZATION REVIEW ADMIT TO DISCHARGE AND BEYOND

• MEDICAL NECESSITY REVIEW
• PHYSICIAN ADVISOR
• UR COMMITTEE

LIST OF REGS/REQUIREMENTS DEPENDENT ON CASE MANAGEMENT

• MEDICAL NECESSITY – FALSE CLAIM
• UR PLAN – CONDITION OF PARTICIPATION – MEDICARE CERTIFICATION
• DISCHARGE PLANNING – CONDITION OF PARTICIPATION – MEDICARE CERTIFICATION
• IMPORTANT MESSAGE & ROOM – CMS BILLING REQUIREMENT
• SIGNED IP STATUS ORDER – CMS BILLING REQUIREMENT
• INPATIENT ONLY PROCEDURES – CMS BILLING REQUIREMENT
• REVIEW INFORMED CONSENTS – COP & LOUISIANA LAW
• PHYSICIAN COMPETENCY AND QUALITY – CONDITION OF PARTICIPATION – GOVERNANCE

SCENARIO 2
SURGERY INSTRUMENT WITH TISSUE

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BE OBJECTIVE- INVOLVE SOMEONE EXTERNAL

INVOLVING SOMEONE EXTERNAL SHOWS STAFF LEVEL EMPLOYEES THAT YOU ARE TAKING CONCERNS SERIOUSLY AND ARE WILLING TO REMOVE YOUR OWN BIASES.

INCREASE TRANSPARENCY WHEN SOMETHING IS WRONG

GET TO THE ROOT OF THE PROBLEM:
- RCA
- FMEA

MUST HAVE- STAFF CLOSEST TO THE WORK INCLUDED IN THESE PROCESSES

GET LEAN

CREATE STANDARDIZED WORK
- IMPROVE EFFICIENCY
- ELIMINATE VARIATION AND REDUCE ERROR RATES
CULTURE

WHAT IS A "JUST" CULTURE?
A JUST CULTURE EXISTS WHEN TEAM MEMBERS TRUST EACH OTHER, ARE
REWARDED FOR PROVIDING INFORMATION ABOUT ADVERSE OUTCOMES AND
EVENTS, AND ARE CLEAR ABOUT THEIR RESPONSIBILITIES REGARDING SAFE AND
COMPLIANT BEHAVIORAL CHOICES.

MOST IMPORTANTLY, THERE IS A SHARED ACCOUNTABILITY FOR
RISK AVOIDANCE.

PATIENT SAFETY CULTURE
SURVEY RESULTS

OVERALL PATIENT SAFETY GRADE

NUMBER OF EVENTS REPORTED
**WINS**

1. **TEAMWORK WITHIN UNITS**
2. **HOSPITAL MANAGEMENT SUPPORT FOR PATIENT SAFETY**
3. **SUPERVISOR/MANAGER EXPECTATIONS & ACTIONS**

**OPPORTUNITIES**

1. **HOSPITAL HANDBOFFS & TRANSITIONS**
2. **NON-PUNITIVE RESPONSE TO ERROR**
3. **STAFFING**

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**Culture of Safety Pulse Survey**

**LMH 2016**

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**JUST CULTURE DOESN'T ONLY SUPPORT SAFETY CULTURE**

- Encourage Reporting
- Support Learning Organization
- Focus on Systems, not Individuals
- Coaching, Not Punishing
- Root Cause Analysis
- Welcome and Embrace Surveillance
- Encourage Accountability and Ownership

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**Safety Culture Composites**

- Hospital Handoffs & Transitions
- Communication on Error
- Feedback on Error
- Organizational Learning Continues
- Supervision/Manager Expectations & Actions
- Staffing
- Frequency of Events Reported
- Teamwork within Units
- Overall Perceptions of Safety

0% 10% 20% 30% 40% 50% 60% 70% 80% 90%
LIST OF REGS/REQUIREMENTS DEPENDENT QUALITY

- REPORT A CONCERN – 7 ELEMENTS OF COMPLIANCE PROGRAM
- NON-RETALIATION – 7 ELEMENTS OF COMPLIANCE PROGRAM
- INVESTIGATE – 7 ELEMENTS OF COMPLIANCE PROGRAM
- POLICIES & PROCEDURES
- INFECTION CONTROL – CONDITIONS OF PARTICIPATION & THE JOINT COMMISSION

SCENARIO 3
COMPLIANCE & REGULATORY COMMITTEE
BEST PRACTICE SHARING

KAREN MAI, RHIA, CRC, COMPLIANCE MANAGER
LAURENCE GENERAL HEALTH SYSTEM

CRC EVOLUTION

[Diagram showing the evolution of the Compliance Risk Assessment process]
MEETING AGENDA

LESSONS LEARNED

- Sharing Audit Results
- Sharing the Compliance Audit Plan
- Education
- Transparency & Accountability
- Safe Environment to Ask Questions/Non-Punitive

LEVERAGING TECHNOLOGY
TECHNOLOGIES

- ENSOCARE – CASE MANAGEMENT SOLUTION THAT INTEGRATES WITH ELECTRONIC MEDICAL RECORD
  - PRES-CARE IDENTIFIED WHEN Registered IN ED
  - IMPATIENT ORDER SIGNATURE

- COMPLIANCE TOOLS –
  - INCIDENT REPORT
  - SURVEY MANAGER/ AUDIT TOOL
  - MYBONE – DENT TEACHING TOOL
  - POLICY MANAGER – DATABASE FOR ALL POLICIES

QUESTIONS?

THANK YOU