WHAT DOES CMS MEAN TO ME AS A BIOMED TECH?

Teri Spencer, RN
Objectives

- Become familiar with:
  - Medicare ESRD survey tasks related to the Biomed Tech role
  - What CMS surveyors are looking for during those survey tasks
  - The CMS expectation of the Biomed Department role in QAPI
Have you been surveyed?

- Were you interviewed by the surveyor?
- Were their questions pertinent?
- What did they look at?
- What was your overall impression?
Tips for survey success

- Know the “right” way to do things
  - do things that way daily
- Train your staff in the “right” way
  - monitor their practice frequently
- RELAX...Be polite and honest with the surveyor
- It’s OK not to know an answer, but know where to find it
- NEVER make anything up!
Background on CMS process

- **ESRD Conditions for Coverage 2008**
  - Focus on patient safety in technical areas
  - Adopts ANSI/AAMI RD 47:2002 for dialyzer reprocessing & reuse

- **ESRD Survey Process**
  - 16 survey “tasks” conducted on-site
  - Every 3-4 years-verifying compliance with CfC
Most cited “Tech” tags in FY 2010

- **V403: Equipment Maintenance and Use**
  - #2 most frequently cited tag: 377 times
- **V401: Safe, Functional Environment**
  - #6 most frequent tag: 218 times
- **V402: Environment Maintained for Safety**
  - #8 most frequent tag: 206 times
- **V196: Carbon Adsorption Monitoring/testing**
  - #16 most frequent tag: 174 times
- **V250: Monitoring Dialysate pH/Conductivity**
  - #19 most frequent tag: 157 times
What we’ll be talking about

- In the 5 survey tasks most important to YOU:
  - Task 3: Tour and Observations of Care
  - Task 6: Water Treatment & Dialysate Preparation
  - Task 7: Reuse
  - Task 8: Machine Operation/Preventative Maintenance
  - Task 14: Quality Assessment and Performance Improvement

1. What surveyors are looking for/at?
2. How to avoid survey citations...
Task 3: Tour and Observations of HD Care

What surveyors are looking at/for:

- Patient treatment room
  - Condition of machines, chairs, equipment
  - **NO DUMMY DRIP CHAMBERS!!!**
  - Reprocessed dialyzers in use

- Water room
  - Condition of room & components: **3 required ones**
  - Current chlorine/chloramine test & reagents
Task 3: Tour and Observations of HD Care

- **Dialysate preparation area**
  - Mixing ratios of acid, bicarb and machines match
  - Equipment condition
    - watch the build up of concentrates!

- **Reuse room**
  - Equipment condition
  - Appearance/condition of stored dialyzers
  - Dirty dialyzers: at room temp or refrigerated?
  - Germicide odors
Task 3: Tour and Observations of HD Care

- Machine maintenance area
  - Cleanliness
  - Machines being repaired clearly labeled

- Observation of HD patient care
  - Staff use of HD machines per DFU
  - Machine functions are intact
  - Dialysate pH/cond check w/independent method
Task 3: Avoiding citations

- Maintain ALL equipment
  - Clean, functional
  - Replace worn, broken parts/components
  - Don’t leave non-functional components in place
    - Ex: water treatment alarms, gauges
- Keep non-patient areas clean, organized
- Train ALL staff in use of equipment per DFU
  - Audit them periodically
- Verify that ALL supplies are appropriate
  - Ex: chl/chl reagents, concentrate proportioning ratios
Task 6: Water Treatment & Dialysate Preparation

- What surveyors are looking at/for: Water
  - Carbon system w/sample port b/t; 10 min EBCT
  - RO w/ quality monitor
    - If DI is present, automatic divert-to-drain required
  - Water quality alarms in treatment area working
  - All other components set up/monitored per RD52
  - All components, valves and flow direction labeled
    - Schematic/valve chart posted and accurate
Task 6: Water Treatment & Dialysate Preparation

- What surveyors are looking at/for: Water
  - Will observe staff test for chlorine/chloramine
  - Will interview person responsible for daily monitoring of water treatment system
    - Assessing staff knowledge/competency (OK to read the component labels)
  - Will review water treatment logs
    - Daily system monitoring
    - Chlorine/chloramine testing
    - Microbial monitoring
    - Chemical analysis
Task 6: Water Treatment & Dialysate Preparation

- What surveyors are looking at/for: Dialysate
  - All proportioning ratios match machines
  - What mixing and distribution systems are in place
  - All equipment used per DFU
  - Central delivery outlets labeled
  - Will interview staff doing mixing/testing
  - May observe mixing/testing
  - Will review mixing & disinfection logs
Task 6: Avoiding Citations

- Get your water treatment and dialysate systems RIGHT and keep them that way
- Train, train, and re-train staff
  - Audit/monitor staff frequently
  - Download CMS interview guides (will ease anxiety)
- Review logs frequently
  - Address problems promptly
  - Encourage staff honesty in reporting by not “coming down” on them-use problem resolving solutions
  - NEVER create missing records-surveyors can spot this!
Task 7: Reuse

- What are surveyors looking at/for:
  - Reprocessing equipment setup, used, maintained/DFU
    - Water pressures at pre-rinse sink
  - Environmental safety w/germicides
  - Will observe entire reprocessing and reuse process
    - Staff w/germicide tests, priming, patient ID
    - Transporting dialyzers to reprocessing location
    - Reprocessing and labeling for 2-3 dialyzers
      - Header cleaning per RD 47
      - All reprocessed dialyzers preprocessed & labeled b4 1st use
  - Interview w/Reuse Tech - assess knowledge/competency
Task 7: Reuse

- What surveyors are looking for/at:
  - Will inspect stored reprocessed dialyzers
    - Labeling, similar names warning, storage times
  - Will review reuse logs:
    - Reprocessing logs for some patients
    - Maintenance and repair of equipment
    - Microbial monitoring in reuse room
    - Germicide air level testing
    - QA AUDITS!
Task 7: Avoiding Citations

- Maintain the reprocessing equipment
- Train, train and re-train **ALL** staff
  - Directly audit **ALL** staff procedures for QA! Record the audits
  - Download CMS interview guides (ease anxiety)
- Review reuse logs routinely
  - Also required in Reuse QA audits
Task 8: Machine Operation/Preventative Maintenance

- What are surveyors looking for/at:
  - HD machines & other equip maintained per DFU
  - Will interview Machine Tech - assess knowledge
  - Will review PM/repair logs of 25% HD machines
    - Tracking operating hours & calendar months b/t PMs
    - Repairs documented-trends addressed
  - Will review dialysate/machine cultures
    - Each machine at least annually (2 per month)
  - Will review ancillary equip maintenance logs
    - AED, scales, pH/cond meters, infusion pumps, eyewash stations, glucose meters, etc.
Task 8: Avoiding Citations

- **Know** the HD machine manufacturer DFU for PM and **stick to it**
- Have a master calendar for PM and cultures
- **Keep good PM records-use manufacturer forms,** if available
- Include ancillary equipment in program
- **Train, train and re-train staff** (no CMS interview guide yet, but look for one soon)
Task 14: Quality Assessment and Performance Improvement

You are an important part of the QAPI program

- Patient safety is the primary goal!

- Keep your logs/records organized
- Attend the QAPI meetings
- Report problems - opportunities for improvement
- Be actively involved in action plans & follow up
Task 14: Quality Assessment and Performance Improvement

- What are surveyors looking for/at:
  - Will review QAPI meeting minutes and materials
    - Participation of Biomed staff
    - Water analysis & water/dialysate cultures reported
    - Reuse QA audits completed
    - Equipment maintenance and repair discussed
    - All adverse occurrences & environmental issues discussed
  - Any areas of concern addressed w/action plans and follow up monitoring
In Summary

The Biomed Department is the cornerstone for patient safety!

You have a vital role in how well a survey will go

So...

Know the “right” way to do your job

Make it your daily practice,

and

You will CRUISE through a survey!
CMS Resources

- CMS ESRD Survey and Certification Web site:
  [http://www.cms.gov/GuidanceforLawsAndRegulations/05_Dialysis.asp](http://www.cms.gov/GuidanceforLawsAndRegulations/05_Dialysis.asp) for all survey tools, interview guides, etc.

- CMS ESRD mailbox for survey-related questions:
  [ESRDSurvey@cms.hhs.gov](mailto:ESRDSurvey@cms.hhs.gov)
Thank you!

Teri Spencer
TB Spencer Consulting LLC
tbspencer8@gmail.com