Medxcel

WHITE PAPER

The Compliance Partner Advantage: Sustaining 24/7 Survey Readiness



Ensuring successful regulatory surveys requires 24/7 readiness



According to the American College of Healthcare Executives (ACHE), regulatory matters rank among leading concerns for hospital leaders. Regulatory compliance is continuously evolving, and the complexity of managing multiple codes and regulations combined with the consequences of not meeting them can be a source of anxiety for healthcare leaders.

Ensuring successful regulatory surveys requires 24/7 readiness - a tall order considering the many functions impacting the physical environment. It's why many hospital leaders seek out a facilities management partner that also provides compliance support.

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Keeping abreast of regulatory changes

The Joint Commission (TJC) and other accrediting bodies continuously refine requirements, implementing and enforcing regulatory changes. Keeping up with those changes is a full-time job that's often too much for hospital staff juggling competing priorities.

"It's very time-consuming," notes Kathy Neal, director, regulatory compliance at Medxcel. "I'm on the TJC website multiple times per week researching and analyzing updates, asking TJC for clarification. When I talk to people who are handling this solo in-house, they always ask me for updates because they're busy managing facilities and don't have time to focus on compliance. They're always worried about their next survey," Neal adds.

One benefit of having a compliance partner is the ability to transfer this responsibility to their shoulders. In addition to monitoring regulatory changes, a compliance solutions provider has a broad view of survey trends across many hospitals and accrediting entities, allowing them to provide guidance on common deficiencies that surveyors are focusing on. If hospitals are getting hit with A, B, and C violations, addressing those same issues in your facility is a no-brainer way to avoid them.

Because our experts are constantly monitoring survey trends, we recently became aware that ligature findings were increasing due to extra scrutiny in this area. Digging into that area more, we discovered that different facilities were using guidelines from various agencies, clinicians were assessing it from a clinical standpoint but without infrastructure knowledge, and there wasn't a go-to assessment that would cover all bases and work for everyone.

As soon as Medxcel learned this, our compliance team created a risk assessment for different types of areas (cafeterias, patient rooms, and so on) as well as general criteria that would apply in every instance. Roughly six months later, TJC, CMS and other authorities came together and created ligature guidelines as patient suicide emerged among the top three sentinel events. Our client facilities were able to adapt to the new guidelines quickly, because we'd already done much of that work.

Without a crystal ball on hand, staying ahead of regulatory requirements comes down to industry knowledge that can't be gained if your eyes never leave your facility. Your compliance partner serves as that watchman.



Make-or-break documentation systems

Within minutes of walking into your facility and talking with your staff, experienced surveyors have a very good idea whether you'll nail or fail your regulatory survey. Dysfunction is hard to hide, and seasoned surveyors grow attuned to signs of a problematic regulatory program. When a surveyor sees you scrambling to find compliance documentation, it raises red flags, increases their level of scrutiny, and turns up the stress level for everyone. You can't prove to a surveyor that compliance goals have been achieved if your records aren't organized and complete.

To solve these challenges, Medxcel utilizes their proprietary Facilities Management Operating System (FMOS®), a systematic approach to organizing facilities operations and regulatory compliance documentation. A series of regulatory binders are tabbed according to TJC Standards and Elements of Performance, making it easy for surveyors to access needed information and records in short order. The FMOS® approach has also been adapted to meet the requirements of AAAHC and DNV.

All things considered, documentation that's thorough and easy to navigate shows you're proficient and proactive in managing your facilities programs, as opposed to scrambling to gather paperwork in the weeks preceding a survey.

To address documentation challenges, Medxcel utilizes a proprietary documentation system



Illuminating blind spots with mock surveys

You can't know the true current state of your physical environment without conducting thorough assessments on a regular basis. The goal, of course, is to catch problems long before a surveyor enters your facility. Routine assessments help with that, giving you a greater understanding and visibility into what's required to keep you survey-ready. In addition to a cadence of periodical assessments, random mock surveys strengthen your ability to ace an impending survey.

During mock surveys, it's important to have a critical eye on the physical environment and clinical behaviors, which is why having an external compliance solutions provider perform your mock surveys is beneficial. A fresh set of eyes walking through your facility will see things that your staff have simply become accustomed to seeing. (Bonus points if your mock surveyor has served as an actual surveyor for TJC or other accrediting organizations.) After a mock survey, your compliance partner should also help craft an action plan, turning findings into real and sustained improvements.



Ongoing support before, during, and after surveys

TJC surveys follow a three-year cycle. Depending on where your facility is in that cycle, you can expect your compliance partner to focus their support accordingly, each year of the cycle.

Before a survey

Facility assessments, physical building tours, risk identification, remediation, and validation of all compliance components should all be part of the support you receive from your compliance solutions provider leading up to a regulatory survey. Your mock surveys, described earlier, would be part of this preparation. The goal: No blind spots, surprises or findings when surveyors audit your facility. The Medxcel compliance team provides support to our on-site facilities teams to help ensure survey readiness. "When I had a survey coming up, Medxcel experts reviewed the FMOS books with me, providing opportunities and suggestions for improvement before the review," Rachel Hutzel, Medxcel facilities supervisor.

During a survey

Your compliance partner should actively support you during a survey, providing any backup documentation and validating that any finding is really a code and not one surveyor's opinion. "We do that in real time so you can have those discussions with surveyors," Neal explains. Your compliance provider might be on site interacting with surveyors, or supporting you behind the scenes.

"Sometimes a facility changes the purpose of a room, turning a patient room into storage space, for instance, and neglects to change the master drawings. This can result in a negative finding during a TJC survey," Neal explains: "Our Life Safety teams work with facility leaders to ensure drawings are updated when changes occur."

Without this compliance resource, many hospitals must chase down the architect who worked in their last construction to update drawings. This often causes unnecessary delays and rarely turns out as well as drawings by a compliance specialist who does this routinely for healthcare facilities.

After a survey

After receiving your survey results, your compliance partner should help you develop a response plan. If any findings are conditional, you can expect surveyors to return within 45 days, requiring you to act quickly. If no conditions exist, a written response might suffice. In either case, they should help you execute those responses.

> "All of the staff go above and beyond. The Joint Commission survey readiness was outstanding! I am so thankful for this team!"
>
> CNO, Florida hospital

Putting it all together: a three-phased approach to greater compliance

The litmus test of an effective compliance strategy is one that's emerged successful after countless TJC surveys. Facilities that partner with Medxcel to maintain a state of survey readiness typically increase their compliance by 16%, on average. In the past three years, Medxcel has helped clients successfully complete over 100 regulatory surveys.

We recommend a three-phase approach for survey readiness:

Phase 1

Pre- program launch

- ✓ Full review to determine facility-specific opportunities for improvement
- ✓ Gather information on any immediate operational and compliance issues
- ✓ Develop a startup plan focusing on areas needing improvement

Phase 2

Post- program launch

- ✓ Full implementation of FMOS® system, organizing policies, procedures and regulatory documentation required for compliance
- ✓ Reassessment of facility to capture a baseline of the current level of compliance
- ✓ Dynamic action plan to resolve and close any findings

Phase 3

Program validation

- ✓ Unannounced validation assessments (mock surveys) to ensure continuous survey readiness
- ✓ Proactive fine-tuning and correction of potential compliance issues

High-performing facilities don't "go it alone"

With regulatory requirements, you're either behind or ahead of the curve- there's really no in-between. No one expects you to know all the answers, and no hospital can do it alone. Discerning leaders know their limits, leaning on trusted allies to advance their compliance on a daily basis.

In doing so, your teams can focus on core patient care and facilities operations, without fear of non-compliance. More importantly, you can rest easier knowing patients are safe, and no regulatory mishap will hinder their care.

Medxcel

As the leading facilities services provider in the U.S. exclusively serving the healthcare industry, Medxcel's unmatched expertise ensures optimal facility management and support that enhances operational efficiency and elevates patient care.

Learn more: medxcel.com

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