

WELCOME

Housekeeping Items





ACCREDITATION UNIVERSITY

- Accreditation University (AU) is dedicated to your organization's success
- Learn more about AU at AccreditationUniversity.com or talk with a representative today





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LISA MEADOWS, MSW

Clinical Compliance Educator — Home Health, Hospice & Private Duty

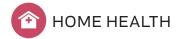






GREG STOWELL

Education & Consulting Manager





JOSÉ DOMINGOS

President & CEO

OBJECTIVES

- Review the ACHC Accreditation Process
- Learn how to prepare an organization for the ACHC Accreditation Survey
- Establish expectations for on-site survey and strategies for survey success
- Learn how to utilize the ACHC Accreditation Guide to Success workbook to ensure ongoing compliance
- Identify how to avoid condition-level deficiencies
- Review the ACHC Accreditation Standards to understand expectations for compliance



HOME HEALTH ACCREDITATION

- ACHC earned CMS deeming authority in 2006
- Accredits more than 1,000 locations nationally
- Program-specific standards include Conditions of Participation (CoPs)
- Agencies have the ability to choose from comprehensive group of services, including
 - Skilled Nursing
 - Home Health Aide
 - Physical Therapy
 - Occupational Therapy
 - Speech Therapy
 - Social Work
 - Palliative Care
 - Behavioral Health Home Care





ABOUT ACHC

- Nationally recognized accreditation organization (AO) with over 30 years of experience
- CMS deeming authority for Home Health, Hospice, and DMEPOS
- Recognition by most major third-party payors
- Approved to perform many state licensure surveys
- Quality Management System certified to ISO 9001:2015



ACHC MISSION & VALUES

Our Mission

Accreditation Commission for Health Care (ACHC) is dedicated to delivering the best possible experience and to partnering with organizations and healthcare professionals that seek accreditation and related services.

Our Values

- Committed to successful, collaborative relationships
- Flexibility without compromising quality
- Each employee is accountable for his or her contribution to providing the best possible experience
- We will conduct ourselves in an ethical manner in everything we do



ACHC PROGRAMS & SERVICES



HOME HEALTH

Home Health Aide

Medical Social Services

Occupational Therapy

Physical Therapy

Skilled Nursing

Speech Therapy



HOSPICE

Hospice Inpatient Care Hospice Care



PRIVATE DUTY

Private Duty Aide

Private Duty Companion/Homemaker

Private Duty Infusion Nursing

Private Duty Nursing

Private Duty Occupational Therapy

Private Duty Physical Therapy

Private Duty Speech Therapy

Private Duty Social Work



DMEPOS

Community Retail

Clinical Respiratory Care Services

Fitter

Home/Durable Medical Equipment

Medical Supply Provider

 ${\sf Complex}\, {\sf Rehabilitation}\, {\sf and}\, {\sf Assistive}$

Technology Supplier



SLEEP

Sleep Lab/Center Home Sleep Testing



AMBULATORY CARE

Convenient Care Clinics



BEHAVIORAL HEALTH

ACHC offers a variety of Behavioral Health services to suit your accreditation needs. Contact ACHC for details or visit achc.org for a complete listing of services available.



PHARMACY

Ambulatory Infusion Center

Infusion Nursing

Infusion Pharmacy

Specialty Pharmacy

> SRX without DMFPOS

Long Term Care Pharmacy

PCAB Accreditation (A Service of ACHC)

- > Non-Sterile Compounding (Ref. USP <795>)
- > Sterile Compounding (Ref. USP <797>)

ACHC Inspection Services (AIS)



DISTINCTIONS*

Distinction in Behavioral Health

Distinction in Hazardous Drug Handling

Distinction in Infectious Disease Specific to HIV

Distinction in Nutrition Support

Distinction in Oncology

Distinction in Palliative Care

*The provider must be accredited with ACHC to be eligible for a distinction service.



EXPERIENCE THE ACHC DIFFERENCE

- Standards created for providers, by providers
- All-inclusive pricing no annual fees
- Personal Account Advisors
- Commitment to exceptional customer service
- Surveyors with industry-specific experience
- Dedicated clinical support
- Dedicated regulatory support



CONSULTATIVE SURVEY APPROACH

- ACHC values drive the survey approach
 - Consultative but not consultants
 - Flexibility without compromise
 - Consistency in interpretation of requirements
 - Accuracy in reporting findings/observations
 - Offering organizations the opportunity to clarify or correct deficiencies



CUSTOMER SATISFACTION

ACHC is committed to providing the best possible experience.

98%



of our customers regard their experience with ACHC as positive.

"There was time, attention and excellent feedback given by ACHC/PCAB at every point of the process."

- PHARMACY, FOLCROFT, PA

Customer Satisfaction Survey data gathered from 7/2015-present.



"ACHC standards certainly improved our compounding pharmacy in terms of quality and control."

- PHARMACY, HAVERTOWN, PA

WE VALUE YOUR FEEDBACK

- Customer Satisfaction data is collected by electronic and phone surveys
- A report is created monthly and submitted to the Accreditation and Clinical Managers that contains the Customer Satisfaction scores
- Cumulative reports are generated quarterly whereby comments and scores for all Surveyors and Account Advisors are reviewed and shared with staff
- Any negative comments or low scores are escalated and the customers are contacted

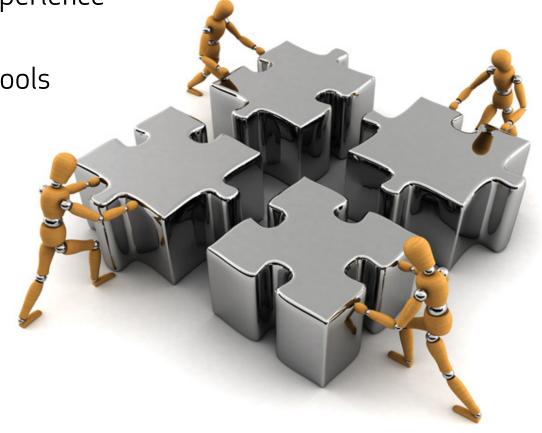


SURVEYOR EXPERTISE

 Surveyor knowledge and expertise drive both the experience and the quality of the survey

Surveyor success is driven by ACHC processes and tools

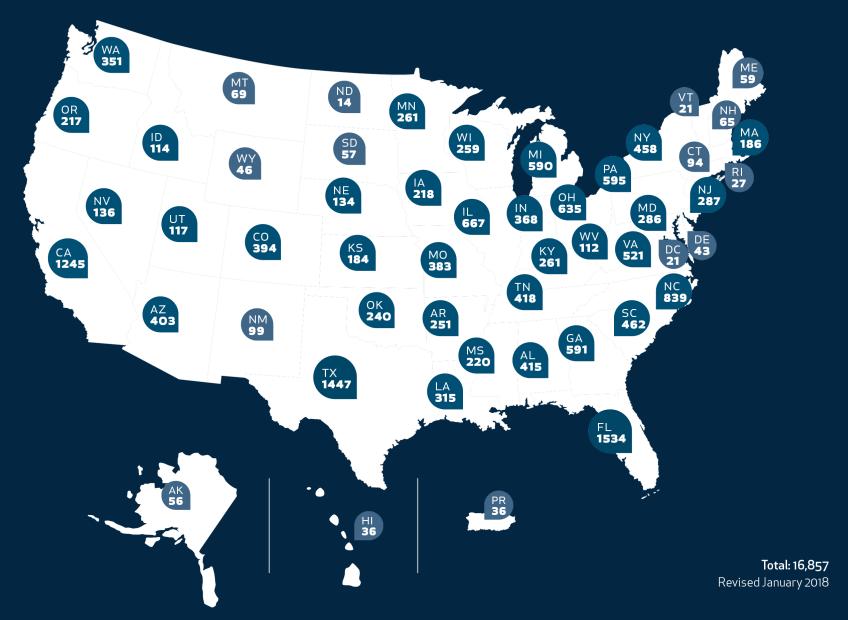
- Surveyor Training
- Surveyor Annual Evaluations
- Surveyor Satisfaction Surveys



PERSONAL ACCOUNT ADVISORS

- Primary contact with customers
- Assigned once a customer submits an application
- Assist customers with the ACHC survey process
 - Pre-survey phone calls
 - Email with links to brief survey-prep webinars and resource links
- Questions that cannot be answered by them will be sent to the appropriate Clinical or Regulatory department







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REGULATORY COMPLIANCE

- ACHC Accreditation Standards include the Medicare Conditions of Participation (CoPs)
- Creates a "Culture of Compliance"
 - Objective evaluation
 - Identify the "gaps" between practice and policy
 - Process improvement
 - Audits
 - Survey preparation



CMS EXPECTATIONS

- Expectation is that providers "remain in substantial compliance with Medicare program requirements as well as State law"
 - As defined by 42 CFR 488.705, "Substantial compliance means compliance with all condition-level requirements, as determined by CMS or the State"
- Have continued compliance, rather than cyclical compliance
- Providers take the "initiative and responsibility for continuously monitoring their own performance to sustain compliance"



HOME HEALTH ALTERNATIVE SANCTIONS

- Prior to the implementation of alternative sanctions, the only option for non-compliance was termination within 90 days
- Alternative sanctions allow agencies additional time to come into compliance



WHAT ARE THE ALTERNATIVE SANCTIONS?

- Civil money penalties
- Suspension of payment for new admissions
- Temporary management
- Directed in-service
- Directed plan of correction



CIVIL MONEY PENALTIES

- Can be per day or per instance
- Per instance only if issue corrected during survey
- Cannot exceed \$10,000 per day
- Cannot exceed six months in duration
- Can include concurrent suspension of payment for new admissions



DEEMED STATUS

- Accrediting Organizations (AOs) do not have to impose alternative sanctions on customers with condition-level deficiencies
- Deemed status agencies remain under the jurisdiction of their AO rather than the state for oversight of their ongoing compliance with health and safety standards, unless the state conducting a validation or complaint survey finds evidence of serious noncompliance
 - In such cases, the agency is placed under the jurisdiction of the state agency
- Once the agency returns to compliance, the Regional Office (RO) will restore its deemed status and return oversight to the AO



FACTORS IN DETERMINING SANCTIONS

- If there are condition-level deficiencies that immediately jeopardize the health and safety of patients that the provider is unwilling or unable to correct, the Medicare agreement is terminated
- Alternative sanctions may also be imposed
- If there are condition-level deficiencies that do not involve the Immediate Jeopardy (IJ) of patients, CMS may
 - Terminate agreement and/or
 - Impose alternative sanctions



FACTORS IN DETERMINING SANCTIONS

- Immediate Jeopardy (IJ) potential
- The nature, incidence, manner, degree, and duration of the deficiencies or noncompliance
- The presence of repeat deficiencies
- The extent to which the deficiencies are directly related to a failure to provide quality patient care
- The extent to which the home health agency is part of a larger organization with performance problems
- An indication of any system-wide failure to provide quality care



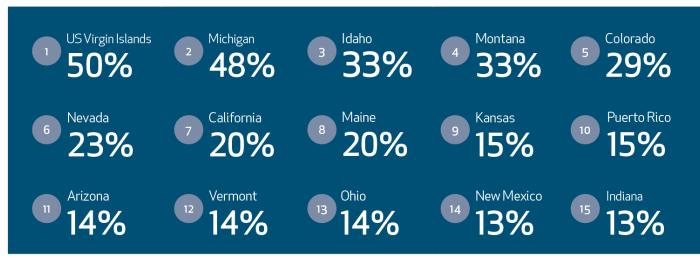
SANCTIONS

- Civil Monetary Penalties imposed
 - Penalty per day for home health's noncompliance (upper range):
 - Minimum: \$16,819
 - Maximum: \$19,797
 - 20 states have imposed CMPs:
 - AR, CO, CT, FL, IA, ID, IN, LA, MA, MI, MN, MO, NH, OH, OK, PA, TN, TX, UT, VA
 - Top 5 states for CMPs (based on dollar amount):
 - OH with \$3.3 million
 - IN with \$2.1 million
 - MI with \$1.8 million
 - MO with \$1.2 million
 - PA with \$913,950



CONDITION-LEVEL DEFICIENCIES BY STATE

Percentage of agencies surveyed by each state in fiscal years 2010 and 2011 where condition level deficiencies were reported. Based on an OIG analysis of CMS data as reported at www.oig.hhs.gov/oei/reports/oei-06-11-00400.pdf.



- 16) Alabama 12%
- 17) Florida 11%
- 18) lowa 11%
- 19) Texas 11%
- 20) Connecticut 10%
- 21) District of Columbia 10%
- 22) New Hampshire 10%
- 23) Minnesota 9%

- 24) New Jersey 9%
- **25)** Utah **9%**
- 26) Arkansas 8%
- 27) Kentucky 8%
- 28) Illinois 7%
- 29) Louisiana 7%
- 30) Massachusetts 7%
- **31)** Georgia **6%**

- 32) Missouri 6%
- **33)** Wyoming **6%**
- **34)** Oklahoma **5%**
- 35) Washington 5%
- 36) New York 4%
- **37)** Tennessee **4%**
- 38) West Virginia 4%
- 39) South Dakota 3%

- **40)** Virginia **3%**
- 41) South Carolina 2%
- 42) Wisconsin 2%
- 43) North Carolina 1%
- 44) Pennsylvania 1%
- **45)** Alaska **0%**
- **46)** Delaware **0%**
- **47)** Hawaii **0%**

- **48)** Maryland **0%**
- 49) Mississippi 0%
- **50)** Nebraska **0%**
- 51) North Dakota 0%
- **52)** Oregon **0%**
- 53) Rhode Island 0%

Source: HHS Office of Inspector General



CMS REPORT

- Every year, Centers for Medicare & Medicaid Services (CMS) evaluates the approved accreditation organizations on the performance of the Home Health and Hospice programs with deeming authority
 - CMS conducts validation surveys on a random sampling of accredited organizations, comparing "condition-level" deficiencies cited by the AO to ones found by the state agency
 - If the state agency finds a condition-level deficiency that was not cited by the AO, it raises the disparity rate for that AO



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BENEFITS OF ACHC'S LOW DISPARITY RATE

- Consistent and thorough survey experience
- Lower risk for alternative sanctions
- Confidence that the Medicare CoPs are being followed

	ACHC				CHAP				TJC				Total
	FY 2012	FY 2013	FY 2014	FY 2015	FY 2012	FY 2013	FY 2014	FY 2015	FY 2012	FY 2013	FY 2014	FY 2015	FY's 2012- 2015
60-Day Validation Sample Surveys	25	11	23	16	50	48	28	51	27	21	24	37	361
SA Surveys with Condition- Level Deficiencies	9	3	3	3	17	11	4	60	7	1	9	12	84
AO Surveys with Missed Comparable Deficiencies	3	1	3	2	11	9	4	60	5	1	4	7	58
Disparity Rate	12%	9%	13%	13%	22%	19%	14%	16%	1996	5%	17%	19%	16%
Sampling Fraction	.09	.05	.08	.06	.05	.05	.04	.05	.04	.03	.03	.05	.05



BECOME A PROVIDER OF CHOICE

Accreditation is a process of review that allows healthcare organizations to demonstrate their ability to meet a predetermined set of criteria and standards. It is regarded as one of the key benchmarks for measuring the quality of an organization. Preparing for accreditation will give you the opportunity to identify organizational strengths and areas for improvement.



BECOME A PROVIDER OF CHOICE

- Differentiate your organization from other healthcare providers
- Demonstrate your commitment to quality
- Build recognition and trust among patients
- Potentially reduce liability costs



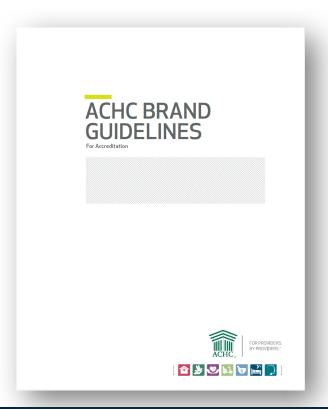
MARKETING ADVANTAGE

- ACHC Accreditation is a noteworthy and distinguishing accomplishment that your agency should be proud to display
 - It shows the organization's dedication and adherence to a rigorous set of standards above and beyond the Medicare CoPs
 - It demonstrates a commitment to providing the highest quality of health care to those served
 - It provides assurance for key constituents: providers, payors, physicians, referral sources, and patients
 - It builds TRUST



MARKETING TOOLS

- ACHC provides you the tools to leverage accredited status
- All accredited organizations receive the ACHC Branding Kit
 - Brand Guidelines
 - ACHC Accredited logos
 - Window cling





BRANDING ELEMENTS

- Gold Seal of Accreditation
 - Represents compliance with the most stringent national standards
- ACHC Accredited Logo







PROMOTING YOUR ACCREDITED STATUS

- A few basic places to promote ACHC-accredited status:
 - Website home page or dedicated landing page
 - Marketing Materials any marketing piece that is seen by the public
 - Press Releases in the "boilerplate" of the press release, or the background information normally found towards the bottom of a press release
 - Social Media home page, banner image, or profile image
 - Promotional Items trade show displays, giveaways, binders, or folders
 - Email email signature



SAMPLE PRESS RELEASE

Your logo here

FOR IMMEDIATE RELEASE

February 26, 2014 Media Contact: Contact Name Organization Name Contact Email Website

YOUR ORGANIZATION NAME ACHIEVES ACCREDITATION WITH ACHC

CITY, STATE, Your organization name proudly announces its approval of accreditation status by Accreditation Commission for Health Care (ACHC) for the services of list services.

Achieving accreditation is a process where healthcare organizations demonstrate compliance with national standards. Accreditation by ACHC reflects an organization's dedication and commitment to meeting standards that facilitate a higher level of performance and patient care.

ACHC is a not-for-profit organization that has stood as a symbol of quality and excellence since 1986. ACHC is ISO 9001:2008 certified and has CMS Deeming Authority for Home Health, Hospice and DMEPOS.

Write a brief paragraph about your company, communities you serve, why you're unique, etc. A quote about the accreditation process or what this accreditation means to your organization is a great way to personalize the press release.

For more information, please visit your website, or contact us at email address or (XXX) XXX-XXXX

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ACHC MARKETING RESOURCES

- ACHC's Marketing Department is available to help with your marketing needs
- Feel free to contact <u>ainfo@achc.org</u> or (855) 937-2242





HOME HEALTH AGENCY REQUIREMENTS

- General Requirements
 - State Operations Manual, Chapter 2, Section 2180C
- Is primarily engaged in providing Skilled Nursing services and other therapeutic services
 - Medicare Benefit Policy Manual Chapter 7, Section 40
- Policies are established by a group of professionals (associated with the agency), including one or more physicians and one or more Registered Nurses to govern the services that it provides

HOME HEALTH AGENCY REQUIREMENTS

- Provides supervision of above-mentioned services by a physician or RN
- Maintains clinical records on all patients
- Is licensed pursuant to state or local law
- Has in effect an overall plan and budget
- Meets the Medicare CoPs
- Meets additional requirements as the Secretary finds necessary



INITIAL CERTIFICATION REQUIREMENTS

- Approved 855A letter
 - Medicare Enrollment Application
 - Required for all home health agencies requesting participation in the Medicare program
 - www.CMS.gov/MedicareProviderSupEnroll
- Test OASIS transmission to the state repository (Successful)
- Required documents to be placed into scheduling

INITIAL CERTIFICATION REQUIREMENTS

- Required number of patients prior to survey
 - Served 10 patients requiring skilled care and 7 active at time of survey (at least 1 patient has had 2 of the services)
 - Unless in a medically underserved area, 5-2 (as determined by the Regional Office)
- Required services
 - Nursing and one other therapeutic services (Aide, Physical Therapy [PT], Occupational Therapy [OT], Speech Therapy [ST], and Social Work [SW] for home health)
 - Both therapeutic services have to have been provided/are being provided
 - At least one service, in its entirety, must be provided directly by a W-2 employee
- Fully operational
 - State Operations Manual, Chapter 2, section 2008A





SEPARATE ENTITIES

The following criteria should be considered in making a decision regarding whether a separate entity exists:

- Operation of the home health agency
 - Are there separate policies and procedures?
 - Are there separate clinical records for patients receiving home health and private duty services?
 - Are personnel identified as belonging to one program or the other and are their personnel records separated?
 - Are there separate budgets?
 - If the state requires a license for home health, is the agency licensed separately for private duty?



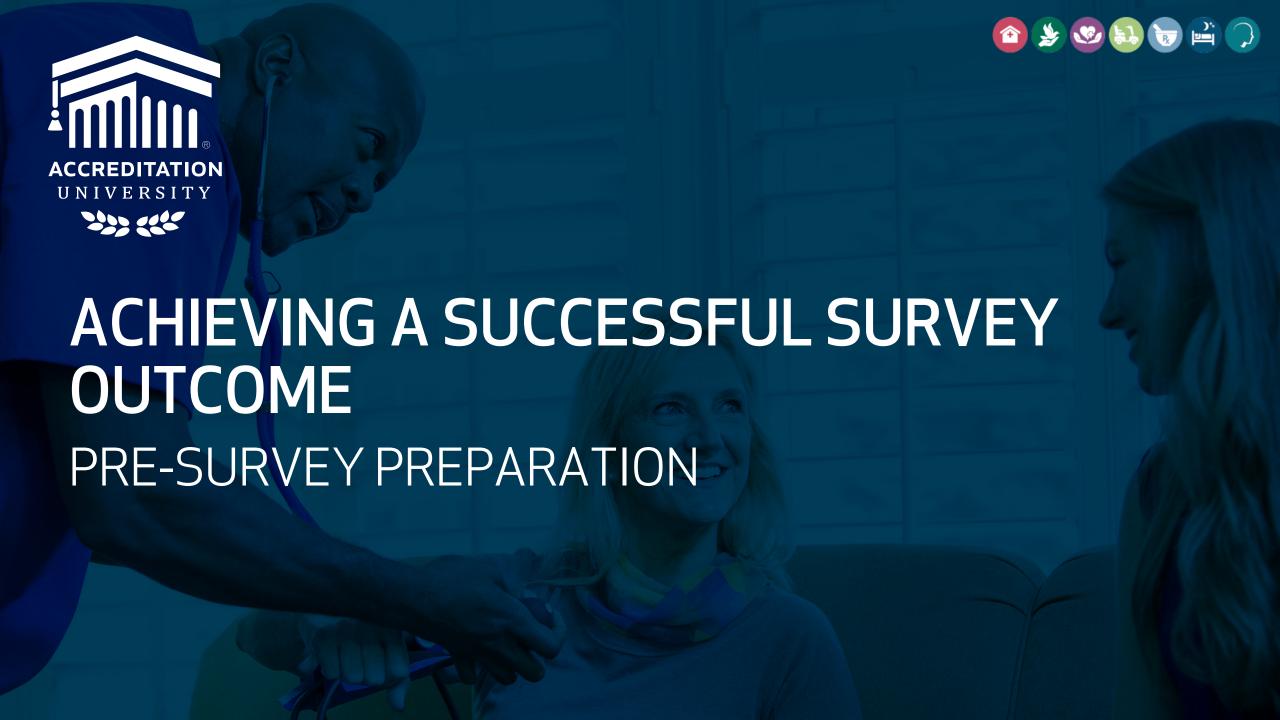
SEPARATE ENTITIES

Consumer Awareness

- Review marketing materials for distinction between the programs
- Written material should clearly identify the home health agency as separate and distinct from other programs, departments, or other entities of the organization

Staff Awareness

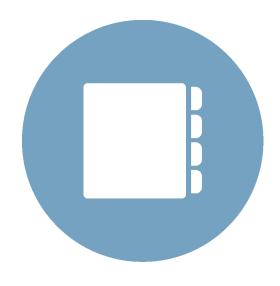
- Staff should be able to identify the difference in services they provide for the home health agency and other programs, departments, or entities of the organization
- Staff who divide time between the separate entities must be appropriately trained and meet the qualifications for home health services



ESSENTIAL MANUALS

- State Operations Manual Appendix B-Guidance to Surveyors: Home Health Agencies
- ACHC Accreditation Standards
- State Operations Manual, Chapter 2 The Certification Process
- State licensing laws/regulations
- Agency policies and procedures
- Scope of practice for each discipline provided
- Local laws/regulations

Always follow the most stringent regulation

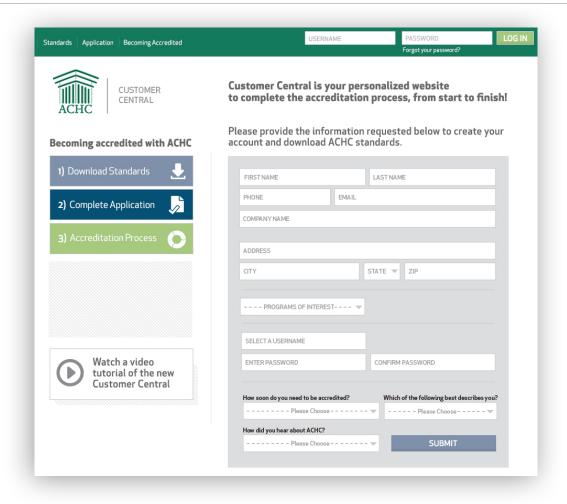


CREATE CUSTOMER CENTRAL ACCOUNT

- Step 1: Visit cc.achc.org
- Step 2: Complete the demographic information
- Step 3: Preview the appropriate standards
- Step 4: Download your customized ACHC standards

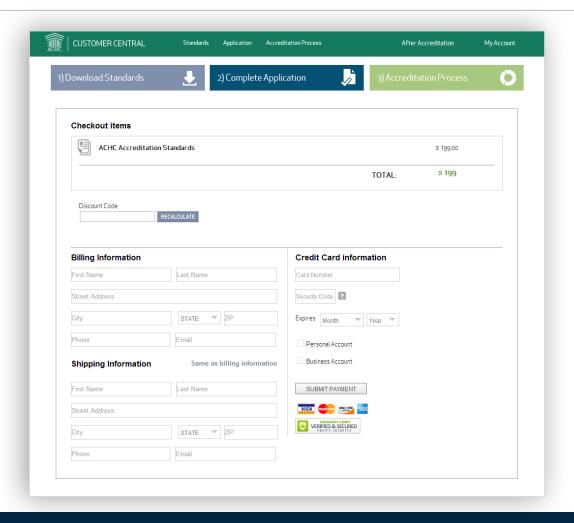


DEMOGRAPHIC INFORMATION





PURCHASE STANDARDS



DOWNLOAD STANDARDS

Download ACHC's Standards Select the program and services applicable to your company and click 'Download'. If standards are not required, Application » continue to your application. Applying for reaccreditation? Download the program-specific updates under Educational Tools. Download **Durable Medical Equipment, Prosthetics, Orthotics, and Supplies Community Retail** Behavioral Health Download Home Health – Medicare Certified Download Standards 😨 ACHC Home Health Accreditation Standards are applicable for healthcare organizations that provide skilled ACHC Process home health care to patients and participate, or seek to participate, in the Medicare program. Home Health services must be administered in the place of residence on an intermittent basis, under physician's orders, and are typically conducted by skilled professionals. ACHC Home Health Accreditation Standards are written by industry experts to align with national regulations and industry best practices. ☐ HHA - Home Health Aide Services Home Health Aide services are provided by a qualified Home Health Aide (HHA) on an intermittent basis to provide personal care. These services are covered by most payors, including Medicare, when other skilled services are also being provided. Aides are supervised by an RN, PT, OT or ST. MSS - Medical Social Services Medical Social Services are provided by a qualified Social Worker or a Social Worker Assistant under the supervision of a qualified Social Worker. These services include but are not limited to resolving social or emotional problems that are an impediment to the effective treatment of the patient's recovery. These services are provided on an intermittent basis and are covered by most payors, including Medicare. OT - Occupational Therapy Services Occupational Therapy services are provided by a licensed Occupational Therapist or Certified Occupational Therapy Assistant (COTA) on an intermittent basis and are covered by most payors, including Medicare. COTAs are supervised by an OT. These services include, but are not limited to upper body strength training, improving range of motion skills, and provision of a home exercise program PT - Physical Therapy Services Physical Therapy services are provided by a licensed Physical Therapist (PT) or Physical Therapy Assistant (PTA) on an intermittent basis and are covered by most payors, including Medicare. Physical Therapy Assistants are supervised by a PT. These services include, but are not limited to gait training, strength training, and provision of a home exercise program



APPENDIX A

Standard	HHA	MSS	SN
HH1-1A	X	X	X
HH1-1A.01	X	Х	X
HH1-1B	X	Х	X
HH1-1B.01	X	X	X
HH1-1C	X	Х	X
HH1-2A	X	X	X
HH1-2A.01	X	X	Х
HH1-2A.02	X	Х	Х
HH1-2A.03	X	X	X
HH1-2A.04	X	X	X
HH1-2A.05	X	Х	Х
HH1-3A	X	Х	Х
HH1-3A.01	X	X	X
HH1-3A.02	X	X	X
HH1-3B	X	X	X
HH1-4A.01	X	X	X
HH1-5A	X	X	X
HH1-5A.01	X	X	X
HH1-5B	X	X	X
HH1-6A	X	X	X
HH1-6A.01	X	X	X
HH1-6B	X	X	X
HH1-6C	X	X	Х
IH1-7A	X	X	X
H1-8A	X	X	X
HH1-8B	X	X	X
HH1-9A.01	X	X	X



APPENDIX B

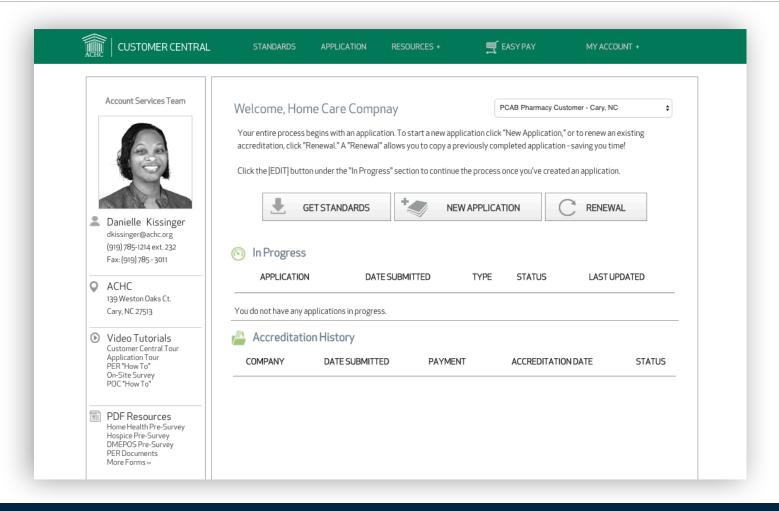
Appendix B: Reference Guide for Required Documents, Policies and Procedures

Customized for: HHA, MSS, OT, PD, PT, SN, ST

Standard #	Documents, Policies and Procedures	Agency Notes
HH1-1A.01	Written Policies and Procedures	
HH1-1B	Written Policies and Procedures	
HH1-2A	Written Policies and Procedures	
HH1-4A.01	Written Policies and Procedures	
HH1-6B	Written Policies and Procedures	
HH1-6C	Written Policies and Procedures	
HH1-8B	Written Policies and Procedures	
HH2-1A.01	Written Policies and Procedures	
HH2-2A	Written Policies and Procedures	
HH2-3A	Written Policies and Procedures	
HH2-4A	Written Policies and Procedures	
HH2-5A	Written Policies and Procedures	
HH2-6A	Written Policies and Procedures	
HH2-6B.01	Written Policies and Procedures	
HH2-7A.01	Written Policies and Procedures	
HH2-8A	Written Policies and Procedures	
HH2-8B.01	Written Policies and Procedures	
HH2-9A.01	Written Policies and Procedures	



GETTING STARTED



APPLICATION

- Online application
- Deposit
- Signed Accreditation agreement
- Payment method
- Preliminary Evidence Report (PER) checklist
- Required documents in order to be placed into scheduling



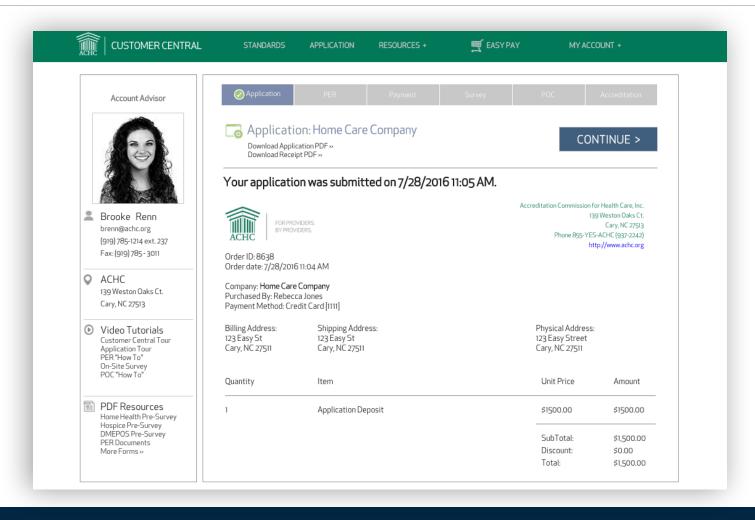
ONLINE APPLICATION

- Select "NEW APPLICATION" or "RENEWAL"
- Main office
 - Profile
 - Location
 - Contacts
 - Services
- Additional locations branch locations, per Medicare provider number
- 10 Blackout dates
- Unduplicated admissions for past 12 months
- Identify services you want accredited
- Renewal should complete application 6-9 months prior to expiration

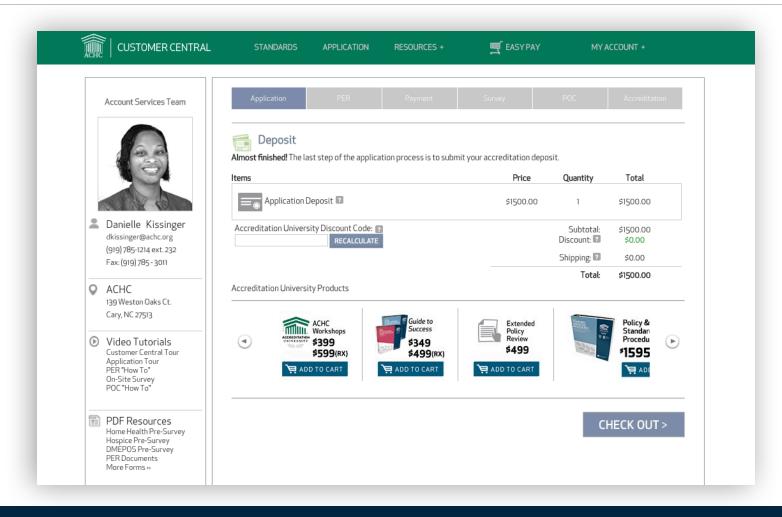


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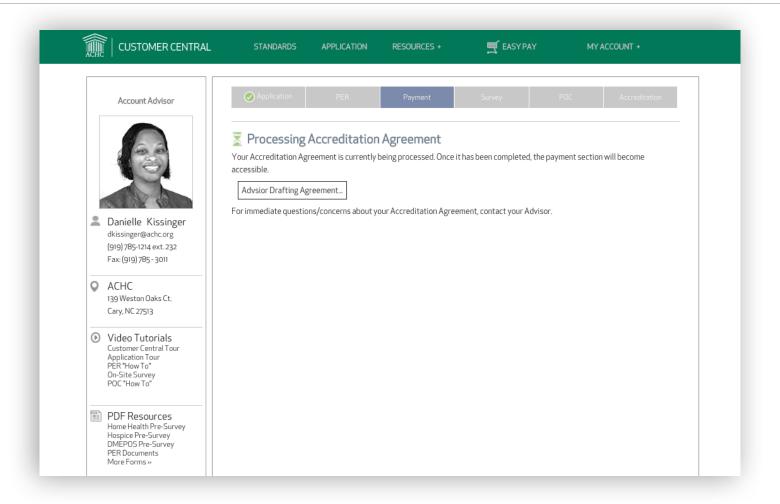
CONFIRMATION OF APPLICATION



SUBMIT DEPOSIT

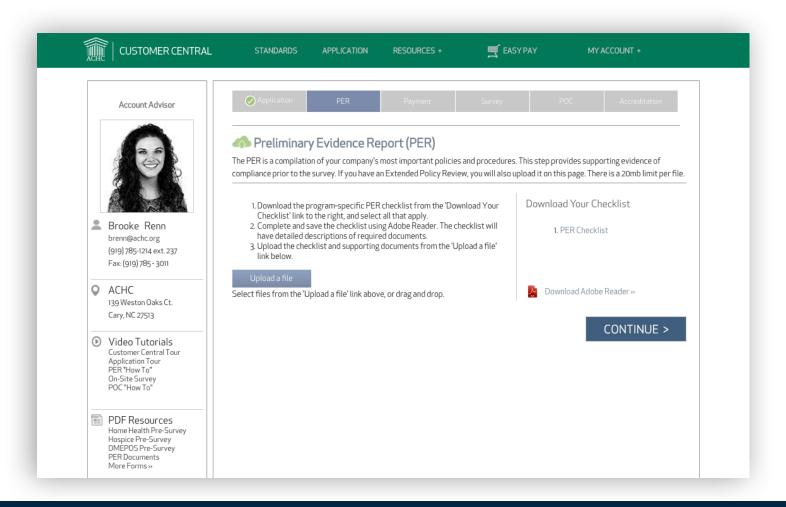


ACCREDITATION AGREEMENT



DDEI

PRELIMINARY EVIDENCE REPORT (PER)



PRELIMINARY EVIDENCE REPORT CHECKLIST

StandardsI acknowledge that this org date.	ganization was/is/will be in compliance with ACI	
		UC Accreditation Standards as of
	ganization was/is/ will be in compliance with Act	ic Accieditation Standards as of
	scheduling once this document, the Agreement for to your Account Advisor and payments are up-to-d	
**PLEASE NOTE: YOUR ORGANIZ	ATION MUST ALWAYS BE IN COMPLIANCE WIT	TH MEDICARE REGULATIONS.
legal name) has met the above requir	ements for survey. If this organization fails to mee	
Initial Medicare Certification Survey	by CMS. This will result in additional charges to the	e organization for a subsequent
survey to be performed when the org	anization has notified ACHC it has met all of the ab	ove requirements.
(Name)	(Title)	
(Date)	(Signature)	
	Associate Agreement are submitted survey as soon as possible. **PLEASE NOTE: YOUR ORGANIZ CONDITIONS OF PARTICIPATION. I, having the authority to represent the legal name) has met the above requirequirements when the ACHC Survey Initial Medicare Certification Survey survey to be performed when the organization. (Name)	Associate Agreement are submitted to your Account Advisor and payments are up-to-d survey as soon as possible. **PLEASE NOTE: YOUR ORGANIZATION MUST ALWAYS BE IN COMPLIANCE WIT CONDITIONS OF PARTICIPATION, AND APPROPRIATE STATE REGULATIONS. I, having the authority to represent this organization, verify that legal name) has met the above requirements for survey. If this organization fails to mee requirements when the ACHC Surveyor arrives on site, the survey performed by ACHC vinitial Medicare Certification Survey by CMS. This will result in additional charges to the survey to be performed when the organization has notified ACHC it has met all of the ab (Name)



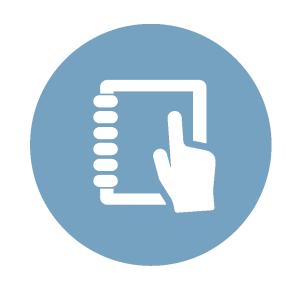
PRELIMINARY EVIDENCE REPORT

- PER
 - Mandatory documents and/or criteria that must be submitted and met in order to begin the survey process
- Date of Compliance you establish on the PER
 - ACHC-only requirements/non-CoPs
- Medicare CoPs, state requirements
 - Acceptance of first patient
- Agency policies
 - Implementation date of policy



EXTENDED POLICY REVIEW

- Optional review of complete policies and procedures by an ACHC Surveyor to determine compliance prior to the on-site survey
- Feedback from an ACHC Surveyor regarding the alignment of agency's policies and procedures to ACHC Accreditation Standards
- Option to purchase through the Customer Central portal
- Reference guide for required documents, and policies and procedures, available as a download
- Utilize Appendix B to organize policies



APPENDIX B

Appendix B: Reference Guide for Required Documents, Policies and Procedures

Customized for: HHA, MSS, OT, PD, PT, SN, ST

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HH1-6B	Written Policies and Procedures	
HH1-6C	Written Policies and Procedures	
HH1-8B	Written Policies and Procedures	
HH2-1A.01	Written Policies and Procedures	
HH2-2A	Written Policies and Procedures	
HH2-3A	Written Policies and Procedures	
HH2-4A	Written Policies and Procedures	
HH2-5A	Written Policies and Procedures	
HH2-6A	Written Policies and Procedures	
HH2-6B.01	Written Policies and Procedures	
HH2-7A.01	Written Policies and Procedures	
HH2-8A	Written Policies and Procedures	
HH2-8B.01	Written Policies and Procedures	
HH2-9A.01	Written Policies and Procedures	



POLICY REVIEW RESULTS

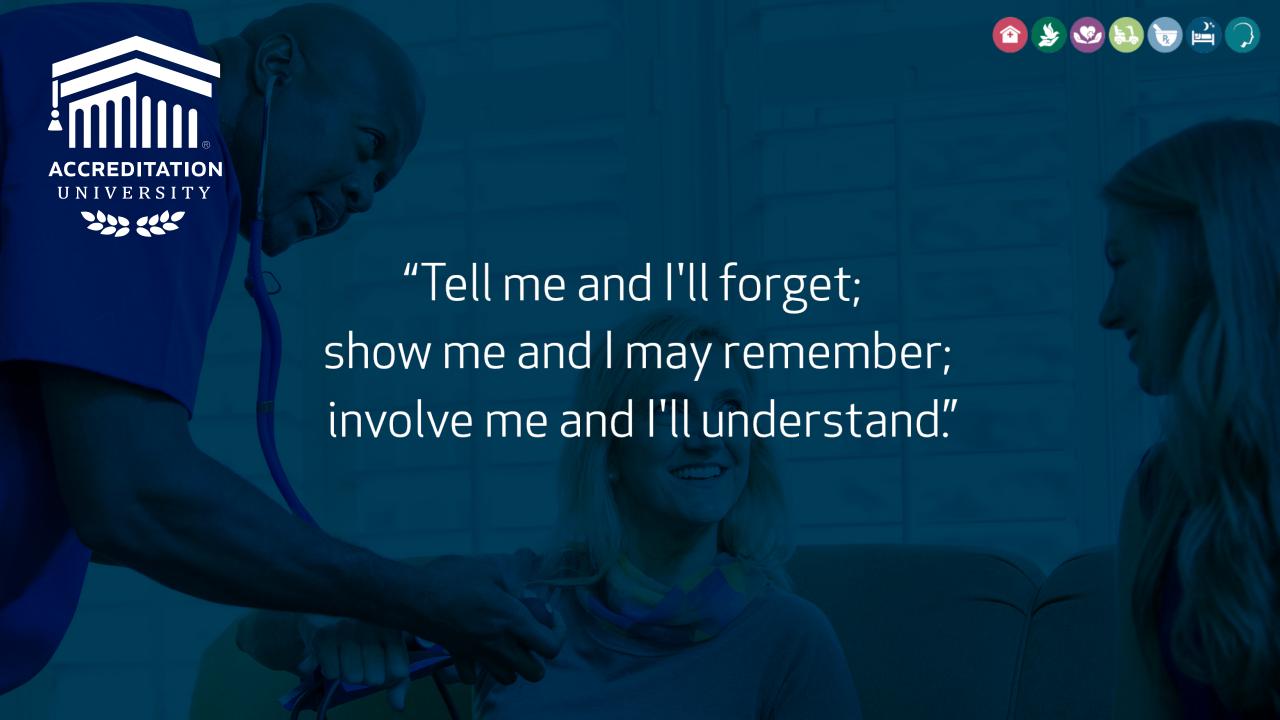
- Desk Review Report will come from your Account Advisor
- 21 days to revise and re-submit all corrections to your Account Advisor
- 30-day window to prepare staff
 - Policy often reflects practice



DESK REVIEW REPORT SAMPLE

		ACHC	
Standard .	/ CFR	Comments	Defi cien
HH1-1B	Written policies and procedures are established and implemented by the HHA in regard to the disclosure of ownership and management information as required in 42 CFR Part 420, Subpart C and action required for a request of information. (484.12(b)) (G119) (G120)	Upon review of policy and procedure B110-Conflict of Interest, it did not address action requirements for request of information and changes in authority, ownership, or management which include: • Disclosure of persons with controlling interest, or managing employees convicted of criminal offenses against title V (Maternal and Child Health Services) and title XX (Social Services) programs. • Disclosure of a change in authority, ownership, or management within 30 days.	Х
HH1-2A	The HHA is directed by a governing body/owner (if no governing body is present, owner suffices), which assumes full legal authority and responsibility for the operation of the HHA. The governing body/owner duties and accountabilities are clearly defined. (484.14(b)) (G128) (G129) (G130) (G131) (G132)	Upon review of policy and procedure B-100 Governing body, it did not include the following duties of the governing body: • Decision making • Reviewing the annual program evaluation • Human resource management • Performance Improvement • Community needs planning, if applicable • Annual review of the policies and procedures	Х
HH1-3A	The governing body/owner(s) arranges for a Professional Advisory Committee with representation from the HHA's professionals having expertise in the program service areas and the lay community. Policies and procedures describe the function of the Professional Advisory Committee. (484.16) (G151) (G152) (G153)	Upon review of policy and procedure B-160, it did not describe describe the function of the Professional Advisory Committee's oversight of the scope of services offered to include: • Medical supervision and plans of care • Emergency care	х
HH1-4A.01	Written policies and procedures are established and implemented by the HHA in regard to conflict of interest and the procedure for disclosure.	Upon review of policy and procedure B-110 Conflict of Interest, it did not address the required conduct of: • Professional Advisory Committee	X









GUIDE TO SUCCESS WORKBOOK

Essential Components

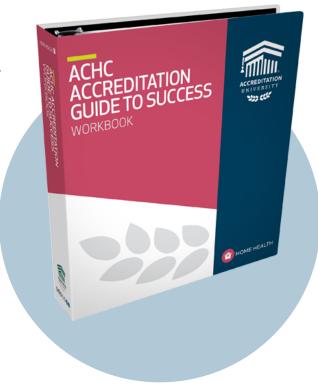
- Each ACHC standard contains "Essential Components," which indicate what should be readily indefinable in policies and procedures, personnel records, medical records, etc.
- Each section also contains audit tools, sample policies and procedures, templates, and helpful hints

Other Tools

 Each section contains compliance checklist and a self-assessment tool to further guide the preparation process

Section Index

 Quickly locate important information for successfully completing the ACHC accreditation process



PREPARATION

- Educate Key Staff
 - Clinical staff (employees and contract)
 - Administrative
 - Professional Advisory Committee (PAC) until January 13, 2018
 - Governing body
 - Patients
- Prepare Agency
 - Human resources
 - IT/EMR
 - Office space
 - Walk around your agency



PREPARATION

- Helpful tools in the ACHC Accreditation Guide to Success workbook
- Mock Surveys
 - Interviews-Survey Process
 - Home visits-Section 4
 - Medical chart audits-Section 5
 - Personnel chart audits-Section 4
 - Observation-Survey Process



ITEMS NEEDED FOR ON-SITE SURVEY

ITEMS NEEDED FOR ON-SITE SURVE

MEDICARE CERTIFICATION AND RECERTIFICATION



Below are items that will need to be reviewed by the Surveyor during available prior to your Surveyor's arrival to expedite the process. If you Advisor.

- Number of unduplicated admissionsper Medicare provider nur operation if less than one year)
- Number of unduplicated admissions per branch location serve the past 12 months (or since start of operation if less than one
- Current patient census, complete with start-of-care date, adm
- Current schedule of patient visits
- Discharge/transferpatient census for past 12 months (or since
- Most recent OASIS Reports, such as Adverse Outcome, Risk A Error Summary (N/A for initial Medicare Certification surveys)
- Personnel listwith title, discipline, and hire date (including dire
- · Any survey results from the past year
- Admission packet and education materials given to patients
- . Staff meeting minutes for the past 12 months
- Any internal Plans of Correction based on identified deficiencie.
 Annual requirements are not applicable to agencies in operation for lepatients admitted one time during the past 12 months regardless of p

ACHC Standard	Required Item
HHHA	Copy of current applicable licenses orpe incorporation/bylaws
HHFIA.01	Access to policies and procedures manu HH22A Patient rights and responsib HH26A Informed Consent and Refus HH29A.01 Compliance Program HH42J.01Personnel policies/employ HH5-18 HIPAA policies HH5-3B Emergency Preparedness PL
HHHA01	All required federal and state posters an
ННнB	Current B5SA/CMS approval letter

Revised 11/2B/2017 [559] Items Needed for Survey-Home Health ACCREDITATION COMMISSION for HEALTH CARE

ACUC Standard Remised Hom

ACHC Standard	Required Item
HH12A, HH12A, 03/ HH19A, 01/HH24A/ HH27A, 01/HH31A/ HH31C/HH6-1C	Governing body meeting minutes for the past 12 months and orientation and signed confidentiality statement(s)
HH15A	Job description for the Administrator
HH15A01	Annual evaluation of the Administrator
HH16A	Organizational chart
HH16B	Job description for the clinical manager(s)
HH18A/HH18B	Previous 4month's final DASIS Validation reports
HH110A	Contracts for direct care, including copies of professional liab contributes
AIFIIA	CLIA certificate of waiverfor agency or CLIA certificate for the laboratory
HH1-12A.01	CMS letter of approval for branch addition (if applicable)
HH2-1A.01	Marketing materials
HH2-4A	Grievance/complaint log
HH25C.01	Business Associate Agreements (BAAs)
HH2-7A.01	Evidence of how ethical issues are identified, evaluated and d
HH2-8A	Evidence of communication assistance for language barriers
HH29A.01	Evidence of a Compliance Program
HH2-10A.01/HH2-11A.01	On-call calendar
HH3-1A	Most recent annual operating budget
HH3-1B	Most recent capital expenditureplan(ifapplicable)
HH3·1C	Evidence of the review of the budget
HH3·3B.02	Recent Medicare cost report(N/A for initial Medicare certific
HH3:4A.01	Listing of patient care charges
HH4-1B.01	Personneli records (including direct careand contract staff) of the items listed in the standard Surveyor will review personn minimum for the following disciplines: Administrator, Clinical Aides, Social Worker, Physical Therapist, Occupational Thera Therapist (if services are provided by the home health agency
HH4-2E.01	Job descriptions for identified staff
HH4-2L01	Employee handbook or access to personnel policies
HH48A/HH48A.01	Evidence of ongoing education and/or written education plan
HH4-12A/HH4-12B/HH4- 12C/HH4-12F	Home Health Aidecompetency evaluation and/or training ma applicable)
HH511A	Evidence of skilled services are provided by or under the supe professionals per ACHC Glossary of Personnel Qualifications
HH512A.01	Patient education materials
HH515A01	Referral log
HH516A.01	Verification of physician licensure

Revised 11/28/2017 [559] Itams Needed for Survey—Home Health

ACHC Standard	Required Item
HH6-1A	Quality Assessment and Performance Impro
HH6-1B.01	Job description for individual responsible for
HH6-1C	Governing body meeting minutes demonstrated body in QAPI
HH6-1D.01	Evidence of personnel involvement in QAPI
HH6-3A.01	QAPI annual report
HH6-4A.02	Evidence of monitoring processes that invol communicable diseases
HH6-4A.04	Evidence of monitoring of an aspect related agency
HH6-4A.05	Satisfaction surveys utilized inQAPI
HH6-4A.06	Evidence of monitoring of patient grievance resolve problems
HH6-4A.07	Evidence of quarterly record reviews and re-
HH6-5A	Evidence QAPI activities focus on high risk,
HH6-6A	Evidence of the monitoring of all patient rek
HH6-7A.01	OASIS reports (most recent OBQM, OBQ), P Report, Submission Statistics by Agency Re evidence of orgoing monitoring of reports
HH7-1A	Evidence of an Infection Control Program, Ti served, TBExposureControlPlan, and OSHV
HH7-1D	Infection controllogs for patients and perso data is monitored and incorpated into QAPI
HH7-3A	Emergency Preparedness Planthat includes
HH7:3C	Communication Plan
HH7-3D	Evidence of emergency preparedness traini including staff that provide services under a
HH7-3D	 Evidence of a minimum of two tests/drillsco One is a community based or facility-ba
	 Second is a community-based or facility community-based or facility-based exertabletop exercise is completed If unable to complete a community-based examport attempts made to participate in a cr
HH7-3E	Emergency plan for integrated healthcare sr agency's needs and circumstances, patient p included in all aspects of the emergency pre applicable)
HH75A.01	Report of annual fire drilland results of test
HH7-6B.01	Access to Safety Data Sheets (SDS)

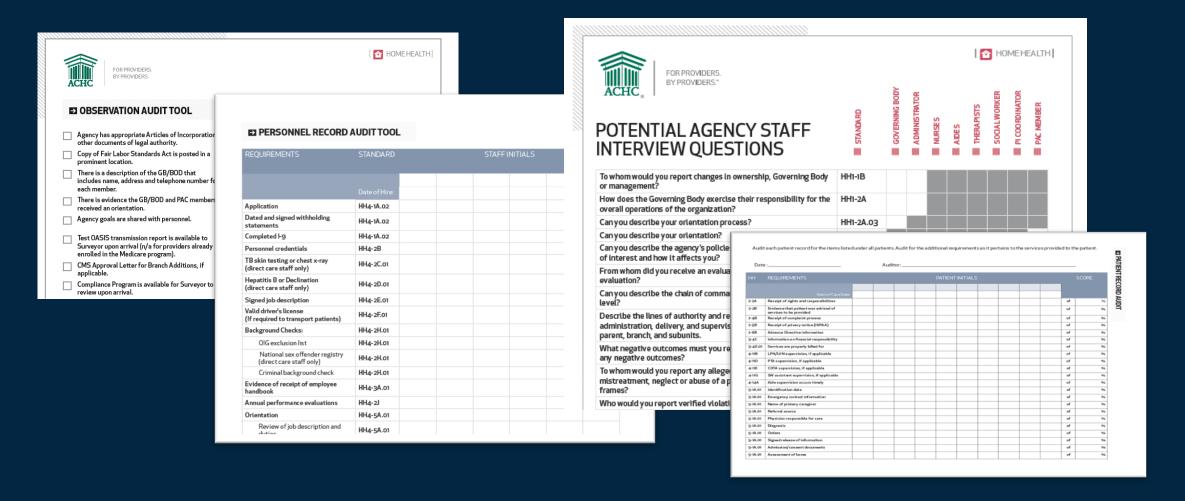
Revised 11/2B/2017 [550] Items Needed for Survey—Home Health ACCREDITATION COMMISSION for HEALTH CARE

ACHC Standard	Required Item	Located
HH7-7A.01	OSHA forms 300, 300 A, and/or 301 (if applicable)	
HH78A.01/HH79A.01	Quality control logs of any equipment used in the provision of care	

Revised 11/2B/2017 [559] Items Needed for Survey—Home Health Page4 of 41 achc.org



SURVEY PREPARATION TOOLS





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CTAN

STANDARD- & CONDITION-LEVEL DEFICIENCIES

- Standard-level deficiencies are ACHC-only deficiencies and individual G tags
 - Not as "severe"
 - Individual, random issue vs. a systemic issue
- Condition-level deficiencies result when either an entire condition is out of compliance, multiple G tags under a single condition are out of compliance, or the deficiency is severe
 - Home Health protocols

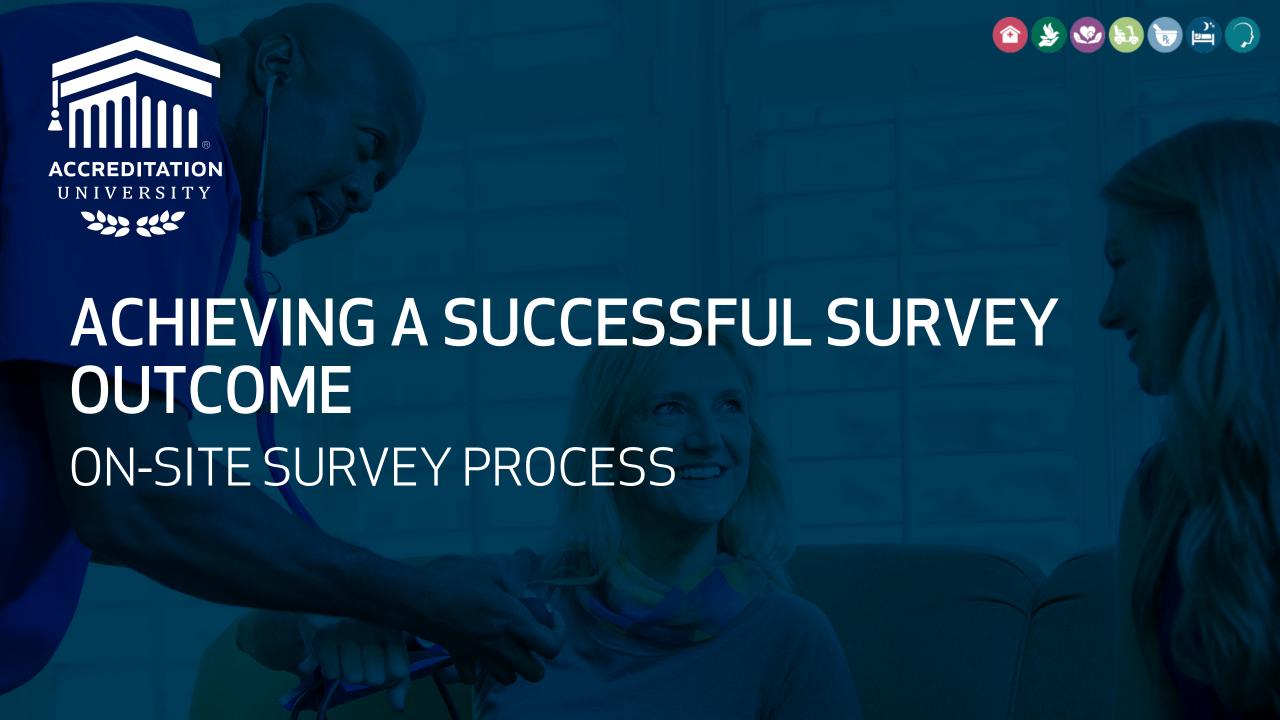


FOCUS AREAS

- Utilize the audit tools, Compliance Checklists, and Self-Assessment to prioritize education
- Implement an internal Plan of Correction (POC)
- Share improvements with your Surveyor during survey

SURVEY SUCCESS

Key to survey success is compliance with the Medicare Conditions of Participation (CoPs)!



ROLE OF SURVEYOR

- To ensure ACHC Accreditation Standards are being followed
- Data collectors
- Documented evidence that is "readily identifiable"



ON-SITE SURVEY

- Notification call
- Opening conference
- Tour of facility
- Personnel file review
- Patient home visits
- Patient chart review
- Interview with staff, management, governing body, and PAC
- Review of agency's implementation of policies
- Quality Assessment and Performance Improvement (QAPI)
- Exit conference



OPENING CONFERENCE

- Begins shortly after arrival of Surveyor
- Completion of CMS paperwork
- Good time to gather information needed by the Surveyor
- KEY REPORTS
 - Unduplicated admissions for previous 12 months (number)
 - Current census and current schedule of visits
 - Name, diagnosis, start of care date, disciplines involved
 - Discharge and transfers
 - OASIS reports
 - Personnel (contract)
 - Name, start of hire, and discipline/role





- Brief tour of facility
 - Medical record storage
 - Maintaining confidentiality of Protected Health Information (PHI)
 - Supply closet
 - Biohazard waste
 - Required posters
 - Fire extinguishers/smoke detectors/non-smoking signage
 - Restrooms



PERSONNEL FILE REVIEW

- Review personnel records for key staff and contract staff
 - Application, tax forms, and I-9
 - Job descriptions and evaluations
 - Verification of qualifications
 - Orientation records, competencies, ongoing education
 - Medical information
 - Background checks

For a complete listing of items required in the personnel record, review Section 4 of the ACHC Accreditation Standards.



PERSONNEL FILE REVIEW

PERSONNEL FILE REVIEW



1 HOME HEALTH

Please gather or flag the identified items for the following personnel/contract individuals.

Standard	Item Required					
HH4-1A.02	Position application (N/A for contract staff)					
HH4-1A.02	Dated and signed withholding statements (N/A for contract staff)					
HH4-1A.02	I-9 Form (N/A for contract staff)					
HH4-2B.01	Evidence that licensed staff credentials have been verified and are current					
HH4-2C.01	Evidence of initial and annual TB screening					
HH4-2D.01	Evidence of Hepatitis B vaccination received or signed declination statement					
HH4-2E.01	Signed job description or contract					
HH4-2F.01	Current driver's license and MVR check, if applicable					
HH4-2H.01	Criminal background check					
HH4-2H.01	Office of Inspector General Exclusion List check					
HH4-2H.01	National sex offender registry check, if applicable					
HH4-2l.01	Evidence of access to personnel policies					
HH4-2J.01	Most recent annual performance evaluation					
HH4-4.01	Verifications of qualifications for non-licensed personnel					
HH4-5A.01	Evidence of orientation					
HH4-6A.01 & HH4-12G	Initial and annual competency assessment					
HH4-6C.01	Evidence of training for the utilization of waived tests					
HH4-7C.01	Initial and annual on-site observation visit					
HH4-8A & HH4-8A.01	Evidence of annual education					
HH4-10A.01	Verification of additional education needed to administer pharmaceuticals or special treatments					
HH1-4A.01	Conflict of Interest Disclosure Form, if applicable					
HH2-5A	Signed confidentiality statement					
HH2-6B.01	Evidence of CPR, if applicable					
Other state- or agency- specific requirements						



MEDICAL CHART REVIEWS

- CMS requirement based on unduplicated admissions
- Representative of the care provided
 - Pediatric-geriatric
 - Environment served
 - Medically complex
 - All payors
- Electronic Medical Record
 - Do not print the medical record
 - Surveyor needs access to the entire record
 - Agency needs to provide a laptop/desktop for the Surveyor
 - Navigator/outline



HOME VISITS

- CMS requirement based on unduplicated admissions
- Visits will be with patients already scheduled for visits if census is large enough to accommodate
- Agency responsibility to obtain consent from patient/family
- Prepare patients and families for potential home visits
- Surveyor transportation



RECORD REVIEW/HOME VISITS

Unduplicated Admissions	Minimum # of Active Record Reviews Without Home Visits	Minimum # of Record Reviews With Home Visits	Minimum # of Closed Record Reviews	Total Record Reviews
300 or less	2	2	2	7
301-500	3	4	3	10
501-700	4	5	4	13
701 or greater	5	7	5	17



EXIT CONFERENCE

- Mini-exit
 - At end of each day identify deficiencies
- Final exit conference
 - Present all corrections prior to the Exit Conference
 - Surveyor cannot provide a score
 - Invite those you want to attend
 - Preliminary Summary of Findings (SOF) as identified by Surveyor and the ACHC standard/CoP
 - Seek clarification from your Surveyor while still on site
 - Regulatory requirements

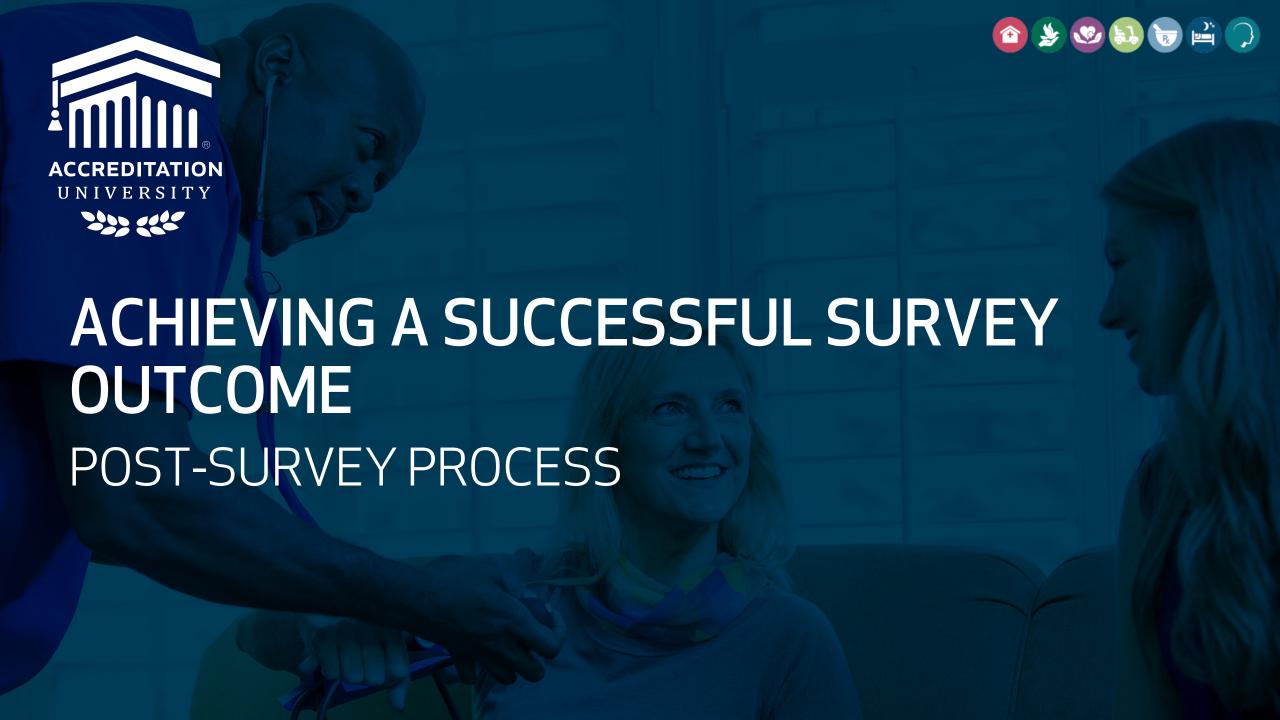


CORRECTED ON SITE

- ACHC only requirements can be corrected on site and a Plan of Correction (POC) will not be required
- G tags that are corrected on site will still be scored as a "No" and a POC will be required
 - Always want to demonstrate regulatory compliance
 - Validation surveys



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POST-SURVEY PROCESS

- ACHC Accreditation Review Committee examines all the data
- Accreditation decision is determined based primarily on CoP/G tag deficiencies
- Summary of Findings is sent within 10 business days from the last day of survey



SUMMARY OF FINDINGS SAMPLE

Survey Report for Survey on 01/28/2014 Services: HHA, MSS, OT, PT, SN, ST



(G146) (484.36(d)(4) (G231) (484.36(d)(4)(i) (G232)



Deficien Standard	cy Category - COP: Standard Level / CFR	Comments	Defi- cient
HH1-10A 484.14(f) G142	An HHA that uses outside personnel to provide care/ services on behalf of the HHA has a written contract/ agreement for care furnished. The contract/	On contract review 1 out of 2 (PTN) contracts did not include a provision that patients are accepted for care only by the agency.	X
	agreement contains all requirements and is kept on file within the HHA. (484.14(f)) (G142) (484.14(h)) (G146) (484.36(d)(4) (G231) (484.36(d)(4)(i) (G232)	Action Required: When patients are to receive home care services from non-W2 staff under a contract agreement the patients are accepted for care only by the home health agency. All contracts for direct care staff must include a provision that patients are accepted for care only by the primary agency. Revise existing contracts to include this provision and include this provision in all future contracts. Educate staff to this requirement. Audit contracts for compliance.	
HH1-10A 484.14(h) G146	An HHA that uses outside personnel to provide care/ services on behalf of the HHA has a written contract/ agreement for care furnished. The contract/ agreement contains all requirements and is kept on file within the HHA. (484.14(f)) (G142) (484.14(h))	2 out of 2 contracts (NTS, PTN) were not in compliance with section 1961(w) of the Social Security Act which states that a home health agency may have others furnish covered items or services through arrangements under which receipt of	Х



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payment by the home health agency for the services discharges the liability of the beneficiary or any other

person to pay for the services.

CTAN

STANDARD- & CONDITION-LEVEL DEFICIENCIES

- Standard-level deficiencies are ACHC-only deficiencies and individual G tags
 - Not as "severe"
 - Individual, random issue vs. a systemic issue
 - Only require a Plan of Correction
- Condition-level deficiencies result when either an entire condition is out of compliance, multiple G tags under a single condition are out of compliance, or the deficiency is severe
 - Home Health Agency Survey Protocols
 - Requires another on-site survey



ACHC ACCREDITATION DECISION DEFINITIONS



ACCREDITED

Provider meets all requirements for full accreditation status.

Accreditation is granted but Plan of Correction (POC) may still be required.*



ACCREDITATION PENDING

Provider meets basic accreditation requirements but accredited status is granted upon submission of an approved POC.



DEPENDENT

Provider has significant deficiencies to achieve accreditation. An additional on-site visit will be necessary to be eligible for accreditation.



DENIED

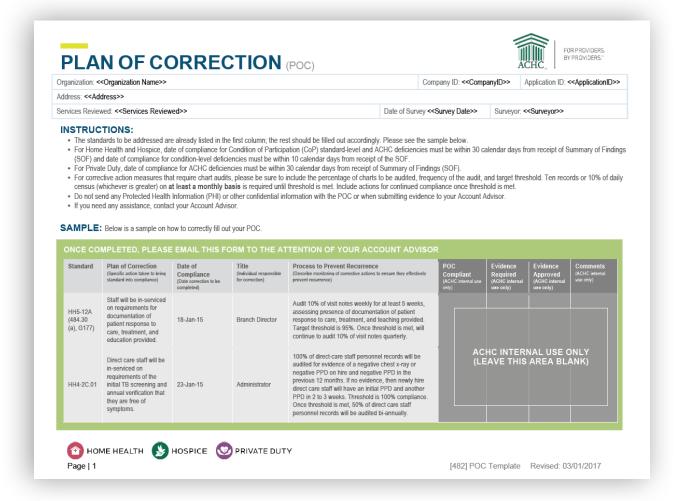
Accreditation is denied. Provider must start process from the beginning once deficiencies are addressed.

PLAN OF CORRECTION REQUIREMENTS

- Due in 10 calendar days to ACHC
- Deficiencies are auto-filled
- Plan of Correction
 - Specific action step to correct the deficiency
- Date of compliance of the action step
 - 10 calendar days for condition-level
 - 30 calendar days for standard-level
- Title of individual responsible
- Process to prevent recurrence 2-step process
 - Percentage and frequency
 - Target threshold
 - Maintaining compliance



PLAN OF CORRECTION





EVIDENCE

- Evidence that is required to support compliance is identified on the POC
- Summation of evidence
- All evidence to the Account Advisor within 60 days
- No PHI or other confidential information of patients or employees
- Accreditation can be terminated if evidence is not submitted

Additional evidence may be required based on the decision of the ACHC Review Committee



SAMPLE AUDIT SUMMARY

-	ART		FOR PROVID
Company name: _		ACHO	5.
Date:	For the week/month of:		
Complete the Observa of evidence that may n	Record /Personnel Record chart with the summation of tion Deficiencies chart and provide the required docum eed to be submitted are: Governing Body or Personnel. ram evaluation, PI activities, or OASIS Validation report	ents to support compliance with the requi Advisory Committee (PAC) meeting minut	irements. Example
	g the implementation of the Plan of Correction (POC) m	oust be submitted, at one time, to your Acc	ount Advisor with
60 days following the	•		
	e until your POC has been approved. Hected Health Information (PHI) or confidential emplo	vee information.	
	, ,	//////////////////////////////////////	
Medical Record/Per	sonnel Record Audit Summary:		
DEFICIENCY/	,	RECORDS CORRECT/	PERCENT
G-TAG	AUDIT DESCRIPTION	RECORDS REVIEWED	CORRECT
Example: HH5-3A\G159	Audit charts for complete plan of care	9/10	90%
33 (-33		5,7	
Observation Deficie	ncies:		
DEFICIENCY/ G•TAG	ncies:	EVIDENCE	
DEFICIENCY/		EVIDENCE Revised contracts	

AFTER ACCREDITATION



SERVICE ADDITIONS

- Home Health
 - Notify Account Advisor
 - Receive a Service Addition Checklist
 - Submit copies of updated policies and procedures
 - Submit copies of appropriate licenses/certificates of staff
 - Submit copies of any contracts that will be utilized
 - Distinction in Behavioral Health and Palliative Care require an additional one-day survey



BRANCH ADDITIONS

- Home Health
 - Notify Account Advisor
 - Receive a Branch Addition Checklist form
 - Submit copy of CMS approval letter for branch addition
 - Submit copies of all applicable licenses
 - Submit list of all licensed employees
 - Submit copies of any contracts being utilized
 - Submit photographs of the outside and inside of the office
 - May or may not require a survey





EDUCATIONAL RESOURCES

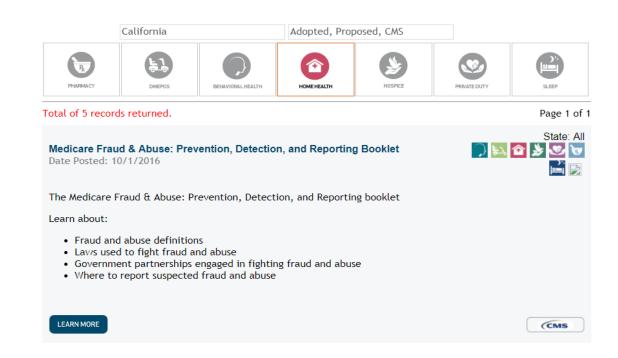
- Accreditation University resources
 - Workbooks and workshops
- Online resources
 - The Surveyor newsletter
 - Regulatory updates
 - Accreditation resources
 - Maintaining compliance checklists
- Email updates
 - "Did You Know?"
 - ACHC Today bi-monthly e-newsletter



REGULATORY UPDATES

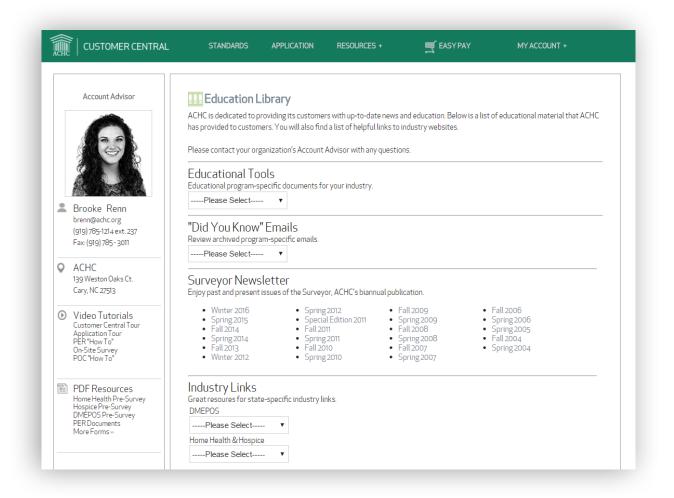
- Regulatory Updates can be filtered to state-specific issues
- achc.org
 - Resources & Events
 - Regulatory Updates

Regulatory Updates

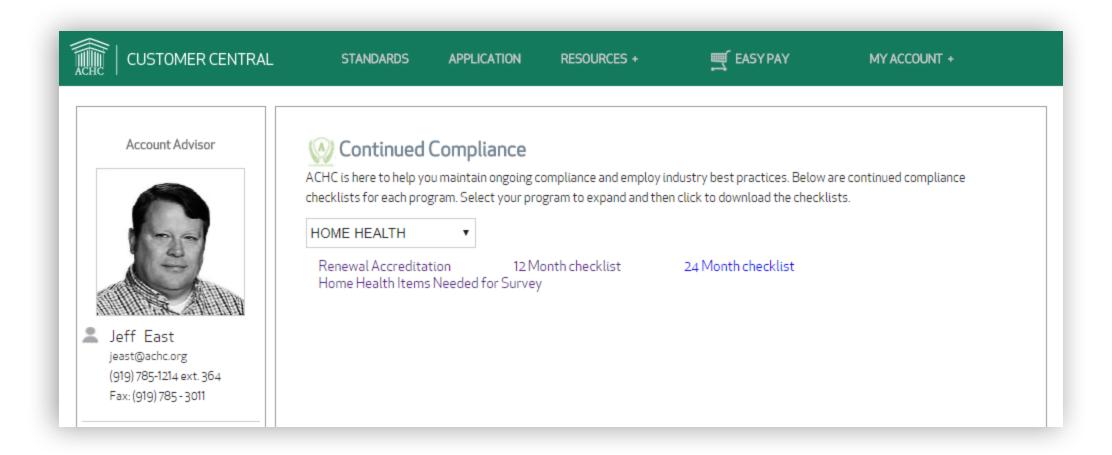


CUSTOMER CENTRAL

- Customer Central is available 24/7 with resources and educational materials designed for your company
- cc.achc.org



MAINTAINING COMPLIANCE CHECKLIST



MAINTAINING COMPLIANCE

RENEWAL ACCREDITATION COMPLIANCERESOURCES



MOME HEALTH

PROTECT YOURSELF WITH ACHC ACCREDITATION

Let us help you to maintain compliance in an ever-cha ACHC to complete your Medicare recertification sur having an alternative sanction imposed upon your ho thousands of dollars per day, a strong compliance pr maintaining ACHC Accreditation is a key strategy. 5 providers, by providers and incorporate the Medicar choosing to become accredited greatly reduces the

In addition to the widely recognized benefits of accre how ACHC will help you avoid these sanctions:

- Condition-level and standard-level violations by ACHC arenot subject to the alternatives an
- For providers who have deemed status, Cente only conducts on-site surveys for complaint of the risk of an on-site visit during which sanction
- · New home health agencies are frequently less providers have access to a variety of resource and Surveyors with industry-specific experien and after the accreditation process.

CMS identified the upper range for Civil Monetary Pe So far 20 states have imposed CMPs: AR, CO, CT, FI PA, TN, TX, UT, VA The top 5 states for CMPs based

- OH: \$3.3 million
- 2. IN: \$2.1 million
- 3. MI:\$1.8 million
- 4. MO: \$1.2 million
- 5. PA: \$913, 950

Utilize the 12 Month and 24 Month Compliance Checkl with the CoPs along with the ACHC Accreditation Sta

[665] Revised: 11/06/2017

ACCREDITATION12-MONTH COMPLIANCE CHECKLIST



Use this checklist, along with the Medical Record Audit tool and the Person Health Agency (HHA) and operations 12 months after your ACHC survey. your organization is in compliance with applicable local, state, and federa intended to replace your own comprehensive review of ACHCAccredit successful accreditation decision. For any areas found to be out of compliance Correction be implemented and results monitored for compliance.

SECTION 1: ORGANIZATION AND ADMINISTRATION		
Standard	Expectation	
HH1-1A	All applicable licenses and permits are current and po	
HH1-1A.01	Federal and state posters are posted	
HH1-1B	Any changes in ownership or of managing employees reported	
HH1-2A	Governing body minutes are properly documented	
HH1-2A.03	New governing body members have been oriented	
HH1-4A.01	Any conflict of interest has been properly disclosed	
HH1-5A	Administrator or other pre-designated individual is queduring all operating hours	
HH1-5A,01	0 1 0	
	Annual evaluation of the Administrator has been com	
HH1-6A	Organizational chart is up to date	
HH1-6B	Clinical manager or other pre-designated individual is during all operating hours	
	Evidence is available to demonstrate the parent agen	
HH1-6C	any and all branches, if applicable	
HH1-7A	At least one service is provided directly by employees	
HH1-8A	OASIS data is collected on appropriate patients	
HH1-8B	OASIS data is reported within 30 days of completing clinical and data audits verify that collected OASIS da reported OASIS data	
HH1-9A.01	Negative outcomes from sanctions, regulatory inspect have been reported, if applicable	
HH1-10A	All contracts for direct care have been reviewed as re the contract and the HHA does not have any contracts have been:	

Accreditation12-MonthComplianceChecklist(HomeHealth)

ACCREDITATION 24-MONTH COMPLIANCE CHECKLIST



MOME HEALTH

Use this checklist, along with the Medical Record Audit tool and the Health Agency (HHA) and operations 24 months after your ACHC your organization is in compliance with applicable local, state, and t intended to replace your own comprehensive review of ACHC A successful accreditation decision. For any areas found to be out of com-Correction be implemented and results monitored for compliance.

SECTION 1: ORGANIZATION AND ADMINISTRATION			
Standard	Expectation		
HH1-1A	All applicable licenses and permits are current		
HH1-1A.01	Federal and state posters are posted		
HH1-1B	Any changes in ownership or of managing emplo reported		
HH1-2A	Governing body minutes are properly document		
HH1-2A.03	New governing body members have been orient		
HH1-4A.01	Any conflict of interest has been properly disclo		
HH1-5A	Administratoror other pre-designated individua during all operating hours		
HH1-5A,01	Annual evaluation of the Administrator has been		
HH1-6A	Organizational chart is up to date		
HH1-6B	Clinical manager or other pre-designated individ during all operating hours		
HH1-6C	Evidence is available to demonstrate the parent any and all branches, if applicable		
HH1-7A	At least one service is provided directly by empl		
HH1-8A	OASIS data is collected on appropriate patients		
HH1-88	OASIS data is reported within 30 days of complications and data audits verify that collected OAS reported OASIS data		
HH1-9A.01	Negative outcomes from sanctions, regulatory i have been reported, if applicable		
HH1-10A	All contracts for direct care have been reviewed the contract and the HHA does not have any con have been:		

[515] Revised:10/31/2017 Accreditation 24-MonthComplianceChecklist (HomeHealth)



ITEMS NEEDED FOR ON-SITE SURVEY

MEDICARE CERTIFICATION AND RECERTIFICATION



Below are items that will need to be reviewed by the Surveyor during your on-site survey. Please have these items availableprior to your Surveyor's arrival to expedite the process. If you have any questions, please contact your Account

- . Number of unduplicated admissionsper Medicare provider number during the past 12months (or since start of operation if less than one year)
- Number of unduplicated admissions per branch location served under the parent Medicare provider number during the past 12 months (or since start of operation if less than one year)
- . Current patient census, complete with start-of-care date, admitting diagnosis and disciplines providing care
- Current schedule of patient visits
- . Discharge/transferpatient census for past 12 months (or since start of operation if less than one year)
- Most recent OASIS Reports, such as Adverse Outcome, Risk Adjusted Outcome, Case Mix, Submission Statistics, and Error Summary (N/A for initial Medicare Certification surveys)
- · Personnel listwith title, discipline, and hire date (including direct care and contract staff)
- Any survey results from the past year
- Admission packet and education materials given to patients
- Staff meeting minutes for the past 12 months
- Any internal Plans of Correction based on identified deficiencies along with audit results

Annual requirements are not applicable to agencies in operation for less than one year. Unduplicated admissions refer to all patients admitted one time during the past 12 months regardless of payor.

ACHC Standard	Required Item	Located
HHHA	Copy of current applicable licenses or permits and copy of articles of incorporation/bylaws	
HHFIA.01	Access to policies and procedures manual with the following policies flagged: HH2-2A Patient rights and responsibilities policy HH2-6A Informed Concert and Refusal of Carepolicy HH2-9A.01 Compliance Program HH4-2L01 Personnel policies/emplayee handbook HH5-18 HIP-Applicies HH7-3B Emergency Preparedness PlanyPolicies	
HHHA01	All required federal andstate posters are placed in a prominent location	
НННВ	Current 855A/CMS approval letter	

[55] Items Needed for Survey-Home Health

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REVIEW THE STANDARDS

- Standard
 - Provides a broad statement of the expectation in order to be in compliance with ACHC standards
- Interpretation
 - Gives you more detailed information and specific direction on how to meet ACHC standards
- Evidence
 - Items that will be reviewed to determine if the standard is met



STANDARD EXAMPLE

Standard HH2-2C: The HHA protects and promotes the exercise of the Patient's Rights. 484.50, 484.50(c), 484.50(c)(1)



Interpretation:

Personnel honor the patient right to:

- To exercise his or her rights as a patient of the HHA
- Have his or her property and person treated with respect Be able to identify visiting personnel members through agency-generated photo identification
- Choose a health care provider, including an attending physician
- Receive appropriate care without discrimination in accordance with physician orders
- Be informed of any financial benefits when referred to an HHA
- Be fully informed of one's responsibilities



STANDARD EXAMPLE (CONTINUED)



Evidence:

Home visits



STANDARD EXAMPLE

Standard HH2-10A.01: Supervision is available during all hours that care/service is provided.



Interpretation:

There is administrative and clinical supervision of personnel in all care/service areas provided 24 hours per day, 7 days a week, as applicable. Supervision is consistent with state laws and regulations.



Evidence:

On-Call Schedule; Observation; Response to Interviews

CONFLICTING REGULATIONS

- Conditions of Participation (CoPs)
- State regulations
- ACHC standards
- Discipline-specific scopes of practice
- Agency policy and procedures



MOST STRINGENT REGULATION

 Must be in compliance with the most stringent regulation in order to be determined compliant with ACHC Accreditation Standards





ORGANIZATION AND ADMINISTRATION

The standards in this section apply to the leadership and organizational structure of the company. All items referring to business licensure including federal, state and local licenses which affect the day-to-day operations of the business should be addressed. This section includes the leadership structure including board of directors, advisory committees, management and employees. Also included are the leadership responsibilities, conflicts of interest, chain of command, program goals, and regulatory compliance.



- Compliance Checklist
- Governing Body Meeting Agenda Template
- PAC Meeting Minute Template
- Hourly Contract Staff Audit Tool
- Conflict of Interest Disclosure Statement
- Acknowledgement of Confidentiality Statement
- Governing Body Orientation
- Self-Audit





PROGRAM/SERVICE OPERATIONS

The standards in this section apply to the specific programs and services an organization is supplying. This section addresses rights and responsibilities, complaints, protected health information, cultural diversity, and compliance with fraud and abuse prevention laws.



- Compliance Checklist
- Patient Rights & Responsibilities Audit Tool
- Sample Ethical Issues/Concerns Reporting Form
- Sample Patient Complaint/Concern Form
- Self-Audit





FISCAL MANAGEMENT

The standards in this section apply to the financial operations of the company. These standards will address the annual budgeting process, business practices, accounting procedures, and the company's financial processes.



- Compliance Checklist
- Home Health Financial Disclosure Statement
- Self-Audit





HUMAN RESOURCE MANAGEMENT

The standards in this section apply to all categories of personnel in the organization unless otherwise specified. Personnel may include, but are not limited to, support personnel, licensed clinical personnel, unlicensed clinical personnel, administrative and/or supervisory employees, contract personnel, independent contractors, volunteers, and students completing clinical internships. This section includes requirements for personnel records including skill assessments and competencies.

- Compliance Checklist
- Job Description Template
- Physical Demands Documentation Check-off List
- Sample Employee Educational Record
- Sample Annual Observation/Evaluation Visit Form
- Personnel Record Audit Tool
- Hints for Developing an Educational Plan
- Sample Hepatitis B Declination Statement
- Tuberculosis Screening Tool
- Sample In-Service Attendance Record Form
- Self-Audit





PROVISION OF CARE AND RECORD MANAGEMENT

The standards in this section apply to documentation and requirements for the service recipient /client/ patient record. These standards also address the specifics surrounding the operational aspects of care/service provided.



- Compliance Checklist
- Patient Record Audit
- Sample Medication Profile
- Self-Audit





QUALITY OUTCOMES/PERFORMANCE IMPROVEMENT

The standards in this section apply to the organization's plan and implementation of a Performance Improvement (PI) Program. Items addressed in these standards include who is responsible for the program, activities being monitored, how data is compiled, and corrective measures being developed from the data and outcomes.



- Compliance Checklist
- Sample Annual PI Report
- Sample Annual Program Evaluation
- Sample Patient Incident/Variance Report
- Sample PI Activity/Audit Descriptions Plan
- Sample Performance Improvement
- Self-Audit





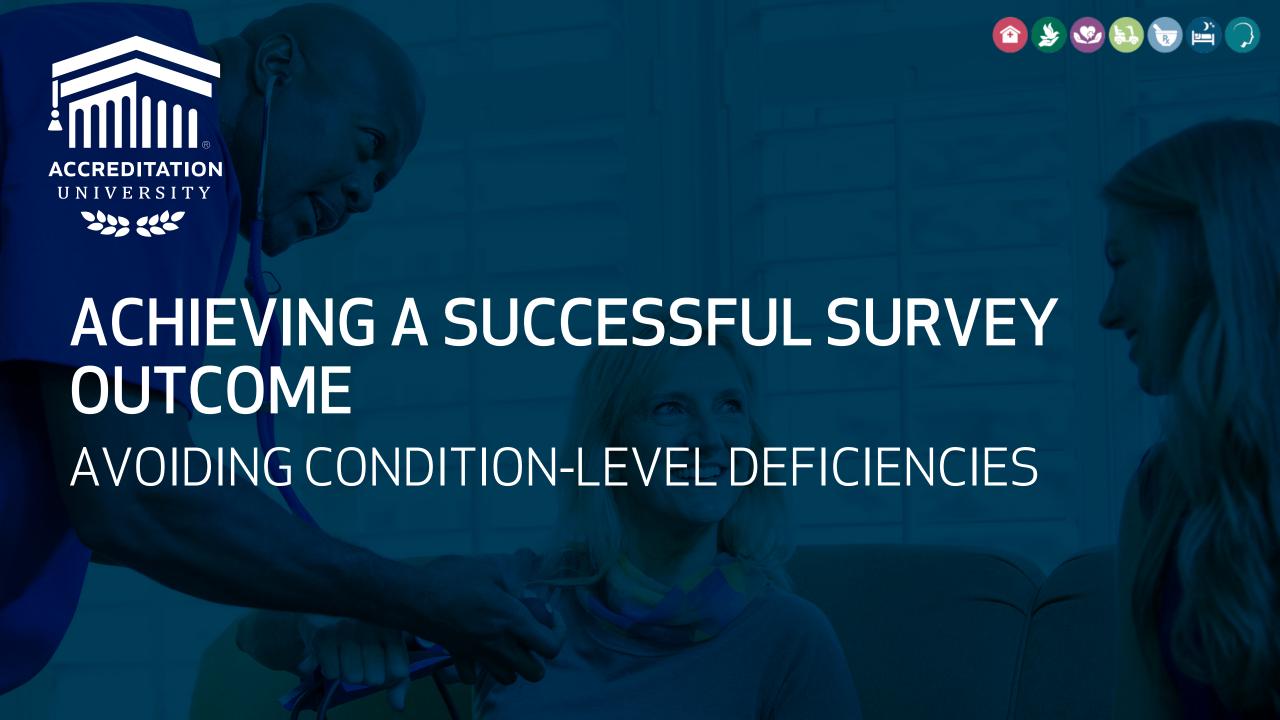
RISK MANAGEMENT: INFECTION AND SAFETY CONTROL

The standards in this section apply to the surveillance, identification, prevention, control, and investigation of infections and safety risks. The standards also address environmental issues such as fire safety, hazardous materials, and disaster and crisis preparation.



- Compliance Checklist
- Hints for Developing a Disaster Plan
- Hints for an Infection Control Plan
- Infection Control Tracking Form
- Safety Tracking Log
- Report of Employee Accident Investigation
- Quality Maintenance Log
- Self-Audit





- Based on previous survey results, these are the anticipated deficiencies likely to be cited based on the new Medicare Conditions of Participation (CoPs)
- The deficiencies focus on 4 CoPs:
 - §484.60 Condition of Participation: Care planning, coordination of services, and quality of care
 - §484.75 Condition of Participation: Skilled professional services
 - §484.80 Condition of participation: Home Health Aide services
 - §484.55 Condition of Participation: Comprehensive assessment of patients



- §484.60 Condition of Participation: Care planning, coordination of services, and quality of care
- Plan of Care:
 - An individualized plan of care that identifies patient-specific measureable outcomes and goals
 - Needs to identify all required components as required in §484.60 (a)(2)
 - All verbal orders are required to be recorded in the plan of care and a new requirement is that verbal orders are to be timed
 - Care is to be provided in accordance with the plan of care/physician orders
 - Drugs, services and treatments are administered only as ordered by the physician
 - Plan of care must be reviewed at least every 60 days or when there are any changes that may warrant a change to the plan of care



- Plan of care continued:
 - Revisions to the plan of care are made based on updated comprehensive assessments
 - Revisions to the plan of care are communicated to the patient, representative (if any), caregiver, and all physicians issuing orders for the plan of care
 - Written information that is provided to the patient:
 - Visit schedule and frequency of visits
 - Patient medication schedule and instructions
 - Any treatments to be administered
 - Any other pertinent instruction related to the patient's care
 - Name of the Clinical Manager



- §484.75 Condition of Participation: Skilled professional services
- Skilled professional services include skilled nursing services, physical therapy, speechlanguage pathology services, occupational therapy services, and medical social work services. Skilled professionals must:
 - Provide ongoing interdisciplinary assessment of the patient
 - Develop the plan of care with the patient, representative (if any), and caregiver
 - Provide services in accordance with the plan of care
 - Provide patient, caregiver and family counseling and education
 - Prepare clinical notes
 - Communicate with all physicians involved in the plan of care as well as with each other
 - Participate in the QAPI program
 - Participate in HHA-sponsored in-service training



- §484.80 Condition of participation: Home health aide services
- Home Health Aides must:
 - Be qualified per §484.80(a)(1)
 - Have evidence of training and competency
 - Have written patient care instructions prepared by the RN or other appropriate skilled professional
 - Provide services that are ordered by the physician and included in the plan of care
 - Be supervised at least every 14 days and have an annual observation visit
 - Report changes in the patient's medical condition and complete documentation per agency policies



- §484.55 Condition of Participation: Comprehensive assessment of patients
- Specific to the medication review
 - An ongoing medication review is completed for all patients; in therapy-only cases, the therapist submits a list of medications for the RN to review
 - All PRN medications identify an indicator as to when the PRN medication should be administered
 - O_2 is listed on the medication profile
 - The physician is notified of any medication discrepancies, side effects, problems, or reactions



ADDITIONAL DEFICIENCIES

- §484.102 Condition of participation: Emergency preparedness
- Emergency Preparedness
 - Emergency Plan is based on a documented, facility-based and community-based all-hazards risk assessment
 - Policies and procedures are specific to your plan and the geographical area in which you provide patient care
 - Communication plan includes the required information
 - All staff have been trained
 - Two tests of the plan have been conducted:
 - Community or facility-based drill and
 - Community, facility, or tabletop drill
 - The entire plan is reviewed and updated at least annually



ADDITIONAL DEFICIENCIES

- §484.65 Condition of participation: Quality assessment and performance improvement (QAPI)
- Must have a QAPI Program that is capable of:
 - Showing measureable improvement in areas where improvements are needed
 - Reflects the scope of the agency
 - Tracking and monitoring of quality indicators:
 - Adverse patient events
 - OASIS outcomes
 - High volume, high risk, problem prone areas
 - Must maintain improvement
 - Demonstrate governing body oversight of the program
 - Performance Improvement Projects; July 13, 2018



TAKEAWAY

- Regulations
 - CoPs
 - State regulations
 - ACHC Home Health Standards
 - Agency policies and procedures
- Audit
- Educate
- Observe
- Repeat



