

Simplification Leads to Compliance Excellence

Better understanding of the standards helps build appropriate policies and procedures for a more successful survey

Client

A large, tertiary healthcare system in New England with three facilities:

- 700-bed academic, research, and teaching hospital including level I trauma and neonatal care
- 90-bed community hospital
- 25-bed community hospital

Many of the department directors and functions cover all three hospitals—and the same administrator oversees the two outlying hospitals—allowing for consistency between the individual facilities.

Background

Although the system has a strong, active internal accreditation readiness program, it has an ongoing relationship with The Greeley Company to objectively evaluate its compliance with both CMS and The Joint Commission. “They rely heavily on Greeley consultants to come in, take a look at their activities, and discuss what’s happening in accreditation across the country,” noted one of the Greeley consultants.

The organization makes significant use of Greeley’s aggregate experience with accreditation updates and challenges. Greeley consultants help the organization craft working agendas to target areas they have been struggling with, improve corrective action work plans, and weigh in on regulatory compliance issues and priorities.

Challenges & solutions

Challenge #1: Distinguishing differences within a large, complex system

One continuous challenge the organization faces is simply the size and scope of the system. “The main hospital is very large, while the others are small, so they struggle—like most systems do—with policy and procedure management and whether to have different procedures at the smaller hospitals where they don’t have the types of staff they have at the large medical center,” the Greeley consultant explained.

Greeley has advised that the organization does not need different policies for the same process for each of the three hospitals; rather, it has helped the system create and streamline its policies to adjust for the specific settings.

“It’s okay to create a subheading within the policy and procedure to adjust it for the smaller facilities,” noted Greeley’s consultant. “It’s okay to have those differences in process because the level of care is the same, but the process to get it done is a little different.”

Challenge #2: Really understanding standards and citations and how to respond—and avoiding “extra work” and “over-compliance”

Sometimes, Greeley’s best advice is to identify when an organization is setting its own bar too high. Many organizations respond to citations above and beyond the requirements of the standards, thus setting themselves up for failure to meet an unachievable goal.

In the case of this New England client, Greeley consultants helped overcome Joint Commission citations for not documenting in the medical record abuse and neglect for every pediatric case in the ED.

Greeley pointed out that there is no requirement to document that an examination for abuse and neglect occurred—the standards require only that staff are knowledgeable about how to recognize the signs and systems and that there is a process to refer and report those signs.

“You don’t have to document it for every patient,” said Greeley’s consultant. “The requirement is if you see it, you recognize it.”

The organization might have responded to the citations by changing its assessment tool in the ED to add an unnecessary step in the documentation process. However, Greeley was able to point out that its current practices were appropriate and assisted the organization in writing a clarification based on what the standards require.

“Most organizations want to get their report from The Joint Commission, respond to it, and get it off their plate, but sometimes the response puts them at a higher risk next survey. Plus, responding to citations by going above and beyond the standard creates extra work that doesn’t add any value to patient care,” the Greeley consultant explained. “Let’s go back, look at the standard, and make sure your organization truly understands the standard and what it means to your day-to-day processes.”

Even if, in the past, an organization has overstepped in response to a surveyor or citation, it is never too late. Reevaluate, and if you have over-interpreted the standard, you can revise your policies and procedures in the name of efficiency—while remaining compliant.

Challenge #3: Recognizing opportunities for achieving consistency, where advantageous, and sharing best practices across the organization

During an onsite mock survey, Greeley consultants found the documentation of restraint usage to be inconsistent due to the fact that the organization is transitioning from paper to electronic records.

“The orders were simple, but when it came down to saying ‘show me your documentation of your evaluation of the patient for restraint,’ it was somewhat difficult,” said the consultant.

Greeley noted, however, that the behavioral health department seemed to be doing a much better job of documenting restraint usage. They sought out an internal expert in the behavioral health department and together they identified that other departments were, in fact, unable to access an electronic document for restraint use—and this “ah-ha” moment led to medical/surgical units gaining access to the electronic document.

ABOUT GREELEY

The Greeley Company

Headquartered in the greater Boston area, The Greeley Company serves administrative and clinical teams in more than 500 healthcare organizations nationwide each year—ranging from the largest healthcare systems and academic medical centers to critical access rural hospitals. We have a rich history of providing innovative consulting, education, outsourcing solutions, interim staffing, and external peer review to healthcare organizations nationwide. Greeley focuses on contemporary needs and challenges related to medical staff optimization & physician alignment; accreditation, regulatory compliance & quality; and credentialing & privileging.

Our mission

The Greeley Company's mission is to help healthcare organizations improve efficiency, comply with regulations and standards, achieve practitioner engagement and alignment, and excel in delivering high-quality, cost-effective patient care.

Our clients

Our clients include healthcare organizations of all sizes and types—from large, multi-setting healthcare systems and academic medical centers to critical access rural hospitals. We work with clinical and administrative individuals and teams across the entire organization including physicians, executives, directors, managers, and frontline staff.

Our advisors and staff

The Greeley Company provides our clients with a dedicated team of advisors who bring valuable experience and rich backgrounds as former hospital, nurse, and physician executives, as former “Big 4” consultants, and as former regulatory surveyors. Our professionals understand your pain and provide the breadth and depth of preparation, training, and education needed to drive success. Behind our advisors stand talented management and support staff committed to ensuring the highest level of customized attention and client fulfillment.

Contact us

Please contact us at 888/749-3054 or info@greeley.com for more information on how The Greeley Company can help you meet your challenges and goals.