

Survey Deficiencies

The following are the top recent deficiencies NASI is seeing on the ABC survey reports:

1. *Evacuation Drills*: As part of the OSHA requirements you need to setup an Emergency Action Plan and perform an annual fire drill. Document the results of the evacuation drill and have the attending employees sign off that attended. Reference: 7020 Emergency Action Plan policy and procedure.
2. *Performance Management*: You must conduct six performance management audits. Review the Satisfaction Surveys, the Questions and Concerns and Complaints forms you've accumulated and make up the Satisfaction audit, Questions and Concerns audit, and Complaints audit. Review your Claims Adjustment and Error log and conduct the Billing and Coding Error Audit. Review your Patient Files for completeness and conduct the Beneficiary Records Audit and look at the notes from your Leadership Committee meetings and conduct the Business Impact Review. Each of these six audits need to be done annually. Reference 5010 Annual Performance Audits, new manual: PM PP Quarterly Performance Audits (now annual): old manual.
3. *Personnel Assessments*: Many facilities are still not conducting annual job performance assessments of their employees. The form is called DMEPOS Personnel Assessment form. 3040 Personnel Files: new manual, HR PP DMEPOS Personnel Assessments: old manual.
4. *Setup and Proof of Delivery Form*: This form should be completed in its entirety including description, quantity and lot/serial number of the product, patient education and the structural stability boxes checked. This form replaces four forms in the old manual: Master List: Beneficiary Documentation Receipt, Setup and Proof of Delivery, Assignment of Benefits and Patient Bill of Rights and Responsibilities. Reference Provision of DMEPOS Products and Services: new manual, Section 4: Consumer Services: old manual.
5. *Biller Education*: Employees responsible for intake and billing need to read the LCD's (Local Coverage Determinations) for each product category dispensed at least once a year. These rules for documentation and billing change frequently. Document this training by printing the first page of the LCD and signing and dating it. Reference 3080e DMEPOS Accreditation Billing Training: new manual, HR PP Pharmacy Personnel Orientation: old manual.
6. *Diabetic Shoes*: Diabetic shoes require additional paperwork and training. A pharmacist who has NCOPE training is permitted to fit custom or non-custom shoes. If the employee is not a pharmacist, they must log their experience hours and sit for a test with ABC or BOC to get a certified fitter certificate and they can fit non-custom shoes only. For a non-pharmacist to do custom shoes, s/he must be a Certified Pedorthist. The patient files for these products must contain a statement from the certifying physician that the patient is being treated for diabetes and has one of six other qualifying conditions, two exams one at intake and one when the inserts are molded to their feet, a plan of care, proof of delivery and training and follow up. Reference ABC's Diabetic Shoe Manual. Contact your specialist for a copy of this document.