

Eli's Rehab Report

NEWS BRIEFS: Got Surveyors? Know Your EHRs Inside-Out

If you manage a rehab setting that sees surveyors (any setting including comprehensive outpatient rehab facilities, home health agencies, skilled nursing facilities, hospitals, rehab agencies, and private practices), your electronic health records (EHR) shouldn't pose a stumbling block for them. Surveyors must be able to conduct the survey process consistently across facilities -- whether those facilities use paperbased records or electronic ones, said the Centers for Medicare & Medicaid Services (CMS) in a letter to state survey agency directors. To ensure consistency, surveyors should discuss their process with each facility in the beginning so that surveyors are allowed unrestricted access to medical records.

Teamwork: Rehab providers and other staff must help surveyors access the records they need regardless of how those records are stored. CMS' letter outlines the steps you must take to help surveyors, including:

- Provide the surveyor with a tutorial on how to use your particular EHR system.
- Designate an individual who will, when requested by the surveyor, access the system, respond to any questions, or assist the surveyor as needed in accessing electronic information in a timely fashion; and
- Provide direct print capability to the surveyor or make available a printout of any record or part of a record upon request in a timeframe that does not impede the survey process.

Remember, CMS reminds surveyors to only print or request paper copies for the parts of records they need to support noncompliance findings, unless protocol requires otherwise.

Attention ALL rehab settings: CMS' letter also reiterated that it supports and encourages the use of EHRs and is "committed to a goal that by 2014, most Americans will have access to health care providers who use EHRs," a goal first established by President George W. Bush in 2004.

You can access the full text of the letter at www.cms.hhs.gov/Survey/CertificationGenInfo/downloads/SCLetter09-10.pdf.