

## OASIS Alert

### Compliance: Here's How To Avoid Unpleasant Survey Surprises

Unnecessary agency policies and procedures can blow your survey.

Use these basic practices to help you be prepared for unannounced surveys.

OASIS strongly influences the survey process, says Chicago-based regulatory consultant **Rebecca Friedman Zuber**. In the past, surveys focused on policy and procedure. But now they focus much more on care provided and the documentation supporting that care, she tells **Eli**.

#### Know What To Expect

Before surveyors arrive at your door, they review your outcome reports, especially the Outcome Based Quality Monitoring (OBQM) report, Zuber said.

This guides them in the choice of patients and diagnoses to focus the survey on, she told the audience in her **Eli**-sponsored audioconference Home Health: Com-mon Survey Problems and How to Prevent Them. (See related story, p. 23.) If you understand the survey process, you can discover problem areas and correct them before the survey, she suggested.

Be the first to know: It is easy to look through the answers to OASIS M0 items and then compare these to the plan of care and the medical record. But it's best if you do that and discover errors before the surveyor does, advised Zuber.

#### File, Don't Pile For Survey Success

If you're using point of care electronic record keeping, provide a way to print out requested medical records quickly, Zuber warned. And ensure your whole staff knows what to do in the event of a survey.

Avoid survey surprises with five more tips Zuber shared with her audience:

- **Know your OASIS policies and procedures.** If your agency has a policy or procedure that is more stringent than those the **Centers for Medicare & Medicaid Services** requires, you will be held to your agency's stricter standards, Zuber explained.
- **Document care coordination.** Many of the conditions of participation require coordination and communication among staff. And when the surveyors check, if it's not documented, it wasn't done.
- **Individualize the plan of care.** Avoid boilerplate care plans that often include actions inappropriate for a specific patient. Include everything you will be doing for the patient, but remember the care provided will be measured against this plan.
- **Be sure your processes are not getting in the way.** If your agency's processes are keeping staff from documenting accurately or if you aren't providing tools for assessing medication interactions, no amount of training will fix the problem.
- **Keep up with the filing.** You may have the document the surveyor needs -- somewhere -- but if you can't find it quickly, it will do you no good.



Note: To learn about the top 10 deficiencies and how to prepare for and recover from a survey, order a tape, CD or transcript of Zuber's conference by calling 1-800-508-2582. To get 15 percent off the cost of your conference, use the reader code 15%OFF AUDIOHH.