2017 Home Health Conditions of Participation: Executive Update

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Strategic Management Model

What do we know?

What do we need to do about it?

What does it mean?

“We are revising the HHA requirements to focus on a patient-centered, data-driven, outcome-oriented process that promotes high quality patient care at all times for all patients.”

Centers for Medicare & Medicaid Services(CMS), HHS. Home Health CoP Final Rule Effective July 13, 2017
• Reorganization of several sections.
• New QAPI CoP (484.65) replaces “Group of professional personnel” and “Evaluation of an agency’s program” and “Quarterly Record Reviews”.
• New Infection Control CoP (484.70) requires agency-wide program that’s integrated in QAPI Program.
• New standard for “Parent-branch relationship”.

Strategic Management Model

What do we know?

What do we need?

What does it mean?

484.50 Patient Rights
Pt and Pt representative informed...in a language and manner the individual understands.

• Written visit schedule w/frequency, medications, treatments and clinical manager name/contact info
• Updates on Plan of care- ongoing
• Written notice of transfer and discharge policy
• Administrator’s contact information
• Regional Agency on Aging resources and more...
• Investigation of Complaints Standard

Obtain signature within 4 days confirming verbal and written notice of rights/responsibilities were provided.
**484.55 Comprehensive Assessment of Patients**

New assessment content required:
- Psychosocial, functional and cognitive status;
- Patient’s care preferences;
- Patient’s progress toward patient goals and measurable outcomes identified by HHA;
- Caregiver willingness, ability and availability;
- Other available patient supports; and
- Patient’s representative (if any).

✓ Physician can determine ROC date.

**484.60 Care Planning, Coordination of Services and Quality of Care**

- Include patient-specific measurable outcomes.
- Include assessment of risk for ER use/hospitalization and all interventions.
- Notify patient, patient rep, caregiver and physician with each significant change to POC.
- Integrated, team approach to care.
- VO are signed, dated and timed.
- Clinical Manager provides oversight to care and personnel

✓ LPNs permitted to accept verbal orders per state.

**484.70 Infection Prevention and Control**

- Follow established best practices.
- Maintain a coordinated agency-wide program.
- Integral part of QAPI program.
- Provide education to staff, patients and caregivers.
484.75 Skilled Professional Services

- IDT approach to home health care is expected.
- Active participation of all disciplines required.
- Partnering with the patient, representative and caregiver in planning of care required.
- Clinical Manager role responsible for interdisciplinary care.

484.65 Quality Assessment and Performance Improvement

- Individualized to your HHA.
- Designed to improve care and HHA operations.
- Capable of showing measurable improvement.
- Focus on high risk, high volume or problem prone.
- Governing body responsible for QAPI.

Five Standards

- Program scope;
- Program data;
- Program activities;
- Performance improvement projects*;
- Executive responsibilities.

*12 month phase-in period.
484.80 Health Aide Services

- Reorganized into 9 standards
- Focus on Competency and performance.
- New training: Communications skills, including the ability to read, write and verbally report…
- New training: Recognizing and reporting changes in skin condition.
  ✓ Recognize a state approved CNA training/evaluation program.

Strategic Management Model

What do we need to do about it?
What does it mean?

Generate buy-in and commitment agency-wide.

- Create a sense of urgency agency-wide.
- Start with Senior Leadership and Governing Body.
- Communicate and educate agency-wide.
6 Months…

1. Name accountable leaders
2. Review CoP Final Rule
3. Revise Patient Rights
4. Policy and procedure review
5. Establish/review/train QAPI Program
6. Establish/review care management model
7. Explore/ use best practice care strategies
8. Utilize your EHR where possible

“It’s not what you know that matters, it’s what you do with what you know.”

Additional Resources

Fazzi’s CoP Readiness In Depth Webinar Series:
• QAPI -- March 8th
• Care Planning & Coordination -- March 22th
• Patient Rights -- April 5th

Fazzi’s CoP Compliance and Operational Consulting Services:
• Hands on help with every aspect of CoP Compliance!

Questions? Contact us: 1-800-379-0361 or info@fazzi.com

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