WELCOME!

• Thanks for joining us!
Objectives

• Understand how The Joint Commission surveyor prepares for a Life Safety Code survey.
• Understand the process of how a Life Safety Code survey is conducted.
• Discuss The Joint Commission mission and deemed status.
• Understand the survey process.

Objectives

• Describe the SAFER Matrix.
• Understand which standards are scored most frequently in 2017.
• Discuss the process of Standards creation.
• Understand the new and revised EP’s in the LS and EC chapters.
  o We are NOT presenting a detailed EP discussion.
Today’s Speakers

- James “Jim” Kendig, MS, CHSP, CHCM, CHEM, HEM, LHRM
- Field Director, Surveyor Management and Development
- Accreditation and Certification Operations

Today’s Speakers

- Timothy Markijohn, MBA/MHA, CHFM, CHE
- Field Director, Surveyor Management and Support
- Division of Accreditation & Certification Operations
The Joint Commission

Mission:
- To continuously **improve** health care
- By **evaluating** health care organizations - meaningful assessment
- To provide **safe** and effective care
- **Inspiring** them to excel

The Joint Commission: Deemed Status

- **1965**
  - Congress: SS Amendments
  - IF accredited by JCAH, “deemed” to be in compliance with Medicare Conditions of Participation (CoP's)

  - Loss of Deemed Status:
    - Approx. 2/3 to 3/4 of revenue from CMS
    - Spigot turned off

  - Not all HCO’s deemed by TJC
    - State AHJ’s
    - Competitors
    - Not deemed at all
The Joint Commission: Deemed Status

Deemed Programs:
- Hospitals
- Behavior Hospitals
- Home Care, Hospice
- Ambulatory Healthcare, including Surgery Centers
- Critical Access Hospitals
- Labs

Survey: Every 3 years (Labs: every 2 years)

TJC – Standards and Elements of Performance (EP’s)

- Tell us what you are going to do
- Tell us how you did it.
- Survey to 2012 editions of:
  - NFPA 99 – Healthcare Facilities
  - HAI
    - Approx. 700,000 / year
      - Approx. 60,000 Deaths / year
ACO-DSSM-SIG – Like the Government

ACO, Executive, Legislative

SIG-ERG - Judicial, Ken Monroe

DSSM - Legislative
Life Safety Code Surveyors (LSCS)

Jim Kendig, MS, CHSP, CHCM, HEM, LHRM
Field Director, LSCS

- 78 Full/Part Time/Intermittent (hiring)
- Many currently work in healthcare facility management
- Minimum of bachelors degree, most have multiple masters &
doctorate level
- Live across the country, survey the globe
- High performers, very engaged, top 1%

Tim Markijohn, MBA/MHA, CHFM, CHE
Field Director, LSCS

SIG - Department of Engineering

Kenneth A. Monroe, PE, MBA, CHC, PMP
Director

Andrea Browne, PhD, DABR
Medical Physicist

VACANT
Engineer

Herman McKenzie, MBA
Engineer

VACANT
Engineer

VACANT
Engineer
ACO
Accreditation and Certification Operations

Understanding The Survey Process

Survey Types

- Full U (Full Unannounced/Triennial)
- Med Def (Medicare Deficiency)
- SSU/OQPS (Special Survey Unit & Office of Quality and Patient Safety)
- ICM 2 or 3 (Intracycle Monitoring)
- Extension Survey (New building/services)
- Medicare Survey (CLD on Initial)
Life Safety Code Surveyor Days - 2018

Hospitals – Each Physical Address = Min. 2 LSCS days (new)

Gross Building Square Footage

<table>
<thead>
<tr>
<th>Gross Building Square Footage</th>
<th>LSCS Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 1,000,000</td>
<td>2 LSCS Days</td>
</tr>
<tr>
<td>1,000,000 – 1,500,000</td>
<td>3 LSCS Days</td>
</tr>
<tr>
<td>&gt;1,500,000</td>
<td>LSC FD Review</td>
</tr>
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</table>

Non Hospital Life Safety Code Surveyor Days - 2018

Gross Building Square Footage

<table>
<thead>
<tr>
<th>Non Hospital LSCS Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>AHC / ASC</td>
</tr>
<tr>
<td>Med Def</td>
</tr>
<tr>
<td>SSU / OQPS</td>
</tr>
</tbody>
</table>

The Hospital Survey Team

- Team Leader
  - Physician or Nurse
- Life Safety Code Surveyor (LSCS)
- Other clinical team members
- Based on physical size of the organization and the amount and types of programs (HAP, OME, AHC, BHC)
LSCS Pre Survey Review

- SOC (BBI – Eapp) PFI’s not visible to LSCS
- Previous report and ESC’s
- Public web site
- Surveyor Resources

Survey Agenda: LSCS Arrives with Team

<table>
<thead>
<tr>
<th>Time</th>
<th>Day 1</th>
<th>Time</th>
<th>Day 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>0800 - 0900</td>
<td>Facility Orientation</td>
<td>0800 - 0815</td>
<td>Day #1 Morning Briefing</td>
</tr>
<tr>
<td>0900 - 0930</td>
<td>Opening Conference/Introductions Only</td>
<td>0815 - 1200</td>
<td>Building Tour Cont’d</td>
</tr>
<tr>
<td>0930 - 1045ish</td>
<td>Document Review</td>
<td>1200 - 1230</td>
<td>Lunch</td>
</tr>
<tr>
<td>1045 - 1200</td>
<td>Pressure Relationships (OR’s/SPD)</td>
<td>1230 - 1430</td>
<td>EC/EM Sessions (Separate)</td>
</tr>
<tr>
<td>1200 - 1230</td>
<td>Lunch</td>
<td>1430 - 1530</td>
<td>Enter day #2 Findings into report</td>
</tr>
<tr>
<td>1230 - 1600</td>
<td>Building Tour (End of day Findings)</td>
<td>1530 - 1600</td>
<td>Interim LSCS Exit/Team Exit</td>
</tr>
</tbody>
</table>
Survey Agenda: Early Exit

- LSCS Pilot in 2016 & 2017
- 2018 and beyond
  - Only 5 day surveys
  - Changes to agenda
    - For example – hard stop vs. morning briefing
    - Starting earlier
- LSCS (or other surveyors such as BH, AHC) will not be on the last two days

Day One morning: Facility Orientation

Main Fire Panel - Upon arrival by the surveyor, an escort will be needed to take him/her to the main fire alarm panel to verify that it is functional - check breaker.

Tip for success: make sure you know location of electrical panel with the designated breaker for the fire alarm.
Day One morning: Facility Orientation

New May 2017

- Visit generators
  - Obtain name plate info, look for EPO
- Visit fire pump room
  - Electric or diesel (Day tank at least 2/3 Full)
  - Spare Sprinkler Heads and Tools
- Prior to the start of the building tour – the 3 Q’s

**Tip for success:** Know the number and types of sprinklers so you can determine the number of spares needed.
Day One morning: Document Review

- Paper or electronic, 90 minutes is the goal!
- Same checklist the Life Safety Code Surveyors (LSCS)/Hospital use
- Serves as Hospitals prep tool for survey – mock review
- Checklist has Standard, EP, Time frequency
- Open book test

**Tip for success:**
- Organize testing document binder in same order as checklist
- Close all open issues and place work order right behind report

Day One morning: Document Review

- Policies and procedures for Interim Life Safety Measures (ILSMs)
- Written fire response plan
- Evaluations of fire drills conducted for the past 12 months – complete fire drill matrix
- Maintenance records for fire protection & suppression equipment
- Maintenance records for emergency power systems
- Maintenance records for piped medical gas and vacuum systems
  - **Tip** – LSCS will use IOU if not readily available
Day One morning: Document List & Review Tool

Day One morning: Documentation Clarification

- Any document not available at time of survey cannot be clarified post survey
- Documents readily available
- Reduce the volume of post-survey clarifications
- Less time and resources spent after the survey
Day One morning: Fire Drill Matrix
Fire Drills - Tips

Tip for success:
- Reminder one drill per shift per quarter +/- 10 days
- > 1 hour between drills (Best Practice: Vary days)
- Number one location for fires in healthcare? Kitchen!
- Place central station and FDC checks on fire drill form – save time and money and eliminate missed annual and quarterly requirements.

Day One morning: Pressure Relationships

- OR’s - Positive to adjacent
- SPD - Decontam - Negative to adjacent
- SPD - Prep/Pack, Sterilizing, Sterile storage – Positive to adjacent
- AllR’s – Negative to corridor, .01” W.C.
- Soiled Utility – Negative to Corridor

Tip for success: When you announce TJC in house – someone please check the critical pressure relationships
Day One afternoon: The Building Tour

- Start at the top
  - Roof – Lab exhausts (Not AllIR’s)
  - Walk stair enclosures
  - Mechanical Rooms, central plant (exit signs visible)
  - Lab, Pharmacy, Kitchen
  - Patients units
  - Radiology, ED, Medical Records
  - Fire/smoke Barriers

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Day One afternoon: The Building Tour

- FD’s (Label, Gap, Close, Latch, Plates) SD’s (Close, Gaps)
- Corridor doors, latching hardware, no more 5lb exception
- Above Ceiling (Sprinkler pipes, Barriers, J-Boxes, Med Pipe)
- Entire building for EC, Hospital and Ambulatory for LS

**Tip for success:** Above ceiling permit system in place?
Interim Life Safety Measures

- Policy reviewed during document review, ILSM Reference guide given
- Mostly for LS findings, either corrected on site or not <8 hours
- Surveyor required to document in report what ILSM is put in place until corrected

**Tip for success:** Know your ILSM policy – education can be limited to specific staff such as plant ops and security

ILSM changes on the report
ILSM changes on the report

Start with Risk Assessment
- Risk assessment = CLD
- No Risk Assessment = ITL
  - Minor items not scored if appropriate risk assessment (such as toilet seat, shower curtain)

Drop down boxes in WST similar to ILSM – pending

Training of Security Officers who observe 1:1

Surveyor training 9/19/17 & continued dialogue with CMS and expert panel – refer to Perspectives
Ligature Update

- Assure risk assessment conducted
- Action to implement plan
- Cite all ligature risks
- S&C Memo: 18-06- Hospitals
- Guidance documents below...
  - See also 2014 FGI Guidelines
    - EC.02.06.05 EP 1
- Tip – who at your org is responsible for S&Cs?

Legionella

- Ref: S&C 17-30-Hospitals/CAHs/NHs
- June 02, 2017
- Training September 22, 2017
- Article in EC News – Sept 2017 – starting on page 6
- EC.02.05.01

14. The hospital minimizes pathogenic biological agents in cooling towers, domestic hot- and cold-water systems, and other aerosolizing water systems.
Survey Expectations...

**CMS S&C Legionella Memo**

Expectations for Healthcare Facilities and Surveyors

Review policies and procedures and reports documenting water management implementation results to verify that the facility has:
- Conducted risk assessment for potential areas of growth and spread.
- Implemented a water management program that considers the ASHRAE industry standard and CDC toolkit and that includes control measures (e.g., physical controls, temperature management, disinfectant level control, visual inspections, and environmental testing).
- Specified testing protocols and acceptable ranges for control measures and documented the results of testing and corrective actions taken when control limits are not maintained.

New Survey Report 2018

- Removes white space
- Sorting feature
- Ability to see SLD vs. CLD
Perspective...

- You are being evaluated on (HAP)...
  - 156 Eps – EC
  - 193 Eps – LS
  - 112 Eps – EM

- So…using only EC and LS – you are being evaluated on 349 Eps….!
- Keep things in ‘perspective!’

SAFER Matrix
Immediate Threat to Life
(Follow current ITL processes)

Likelihood to Harm a Patient/Visitor/Staff

HIGH

MODERATE

LOW

LIMITED

PATTERN

WIDESPREAD

Survey Analysis For Evaluating Risk (SAFER) Matrix™

Immediate Threat to Life
All Standards 0.37%
EC 0.22%
LS 0.00%

Likelihood to Harm a Patient/Visitor/Staff

HIGH

MODERATE

LOW

LIMITED

PATTERN

WIDESPREAD

Survey Analysis for Evaluating Risk (SAFER) Matrix™ - Aggregate HOSPITAL Results for Entire 2017

Immediate Threat to Life
All Standards 0.37%
EC 0.22%
LS 0.00%

Limited to Hazard

PATTERN

WIDESPREAD
Survey changes due to SAFER

- No more Direct and Indirect EP designations
  - Consolidated ESC into one 60-day timeframe
- No more A or C categories
  - No more Opportunities for Improvement (OFIs)
  - *No more Measures of Success (MOS)
- See it / Cite it Survey Methodology

*Note: This does not apply to Sentinel Events where a MOS is required. At this time, the submittal of a MOS for Sentinel Events is still required.

First Half of 2017

<table>
<thead>
<tr>
<th>Program</th>
<th>2016 Surveys</th>
<th>Average RFIs/Survey</th>
<th>2017 Surveys</th>
<th>Average RFIs/Survey</th>
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<tbody>
<tr>
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<td>640</td>
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<td>410</td>
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<td>820</td>
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<td>141</td>
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<td>8.0</td>
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<td>966</td>
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<td>Health Care Staffing Services Certification</td>
<td>193</td>
<td>0.5</td>
<td>121</td>
<td>0.9</td>
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Upcoming Events

- **May 2** – preparing for Life Safety Code Surveys with the Joint Commission – Part 2
- **May 23** - Understanding FEMA Procurement Policies: An Overview of Super Circular 2 CFR 200
- **May 30** – Protection Strategies for the Workforce and Your Devices
- **June 13-14** – Certified Healthcare Safety Professional (CHSP) Preparation Course and Certification Examination
- **July 31-August 1** – Certified Healthcare Emergency Professional (CHEP) Preparation Course and Certification Examination
- **Details**: [http://www.fha.org/education-and-events.aspx](http://www.fha.org/education-and-events.aspx)
Thank You!

john@fha.org
407-841-6230