



# "FQAPI Worksheet Overview"

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QAPI Specialists/Quality Surveyor Educators (QSEs)/Transplant Surveyors

Centers for Medicare and Medicaid Services

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### Enhancing Quality Assessment and Performance Improvement Programs in Transplant Programs and Hospitals (EQAPI)

**Centers for Medicare & Medicaid Services (CMS)** 

TRANSPLANT PROGRAM QUALITY WEBINAR SERIES

# Introduction to the Focused Quality Assessment and Performance Improvement (FQAPI) Survey Worksheet for Transplant Programs

Healthcare Management Solutions, LLC QAPI Specialists/Quality Surveyor Educators (QSE's)/ Transplant Surveyors

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# **CMS Webinar Series Transplant Centers**

- 1. Introduction to the Transplant QAPI: Regulatory Overview
- 2. Worksheet Overview
- 3. Comprehensive Program and 5 Key Aspects of QAPI
- 4. Objective Measures
- 5. Performance Improvements
- 6. Adverse Events
- 7. Transplant Adverse Event "Thorough Analysis"
- 8. QAPI Tools (part 1)
- 9. QAPI Tools (part 2)
- 10. Data display
- 11. Interpretive Guidance
- 12. Writing an effective Plan of Correction and Other QAPI Resources



### **Disclaimer**

- This training consists of Quality concepts, foundational and historical perspectives
  of Quality Assessment and Performance Improvement methodologies as they were
  originally developed.
- There are many definitions of healthcare quality and many methods and tools to address quality assessment and process improvement activities. Today, organizations often blend the best quality concepts and tools to provide for a more nimble and individualized quality program.
- CMS is not prescriptive. This training does not support or advocate any particular method or tool. This training fully supports that the QAPI process includes data driven decisions that will sustain improvement leading to improved patient outcomes.

# **Purpose and Objectives**



The purpose of this webinar training is to enhance Quality Assessment and Performance Improvement activities within Transplant Programs through increased knowledge of quality regulations, methods, tools and documentation practices.

Upon completion of this session, the participant will be able to:

- 1. Identify the key sections of the Transplant FQAPI worksheet;
- 2. Identify the characteristics of a written, comprehensive, implemented Transplant QAPI program as identified in the worksheet;
- 3. Discuss the integration and bi-directional communication needs between transplant and hospital QAPI programs.



# Why the FQAPI Focus?



- Improving patient outcomes and patient safety is the fundamental goal of all QAPI regulations and the survey for compliance
- CMS identified the need to assist States in oversight of Transplant QAPI
- Review of transplant patient outcomes of mortality and graft failure of programs applying for mitigating factors since 2007, indicated the need to globally focus on transplant quality and patient safety



# **Worksheet Survey Process**

Provides for a complete structured review that verifies a comprehensive quality program has been developed, implemented and is effective including:

- Identification of a method for discovery of issues, referral of issues for QAPI interventions and corrective action plans;
- Recognition of high risk, high volume, or problemprone areas being addressed in the QAPI program;
- Initiation of a QAPI process when concerns are identified;
- Appropriate management of Adverse Events.



# The Survey Process is Standardized by using the worksheet



- A 1 ½ to 2 day survey, "unannounced"
- Limited to the Conditions of Participation (CoPs) at §482.96, the condition and five related requirements
- CoP deficiencies other than QAPI in this survey are referred to the appropriate CMS RO
- Performed by CMS contractor according to CMS approved protocol
- Recently standardized to one contractor (HMS) for all 50 states/CMS regions
- Each organ program is surveyed separately
- Two types:
  - Focused QAPI survey only (two surveyors) or
  - "Joint" survey with Initial or Re-approval Transplant Survey (one or more surveyors additional depending on number of programs)



# **Survey Process**

Criteria for program selection for Notification of full/actual FQAPI Survey

- Completed Systems Improvement Agreement (SIA)
- Outcomes Non-compliance: Scientific Registry of Transplant Recipient (SRTR)/other information
- Outcomes Non-compliance: Mitigating Factors
- In conjunction with Initial or Re-approval Survey
- Complaints



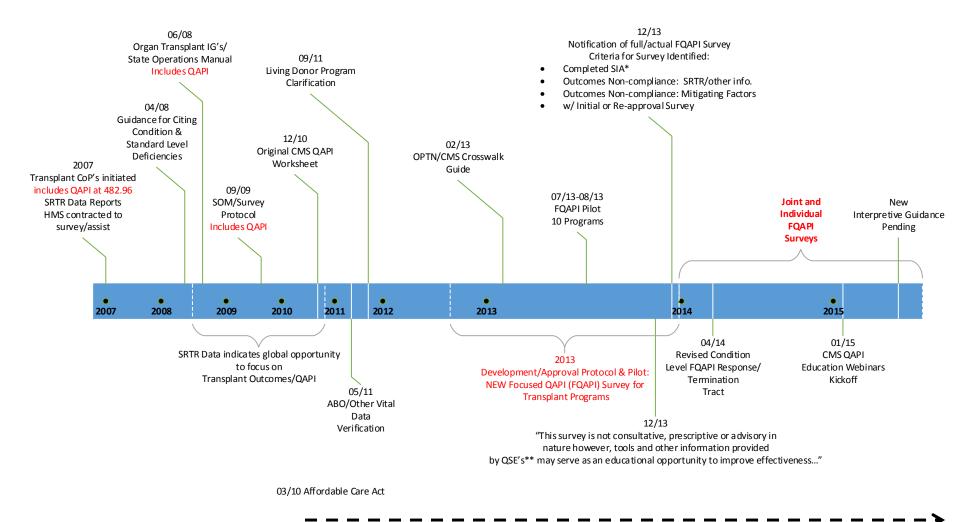
# **Worksheet Guided by Survey Protocol**

- Research & Development process
  - CMS CoPs and other precedents (Hospital, Long Term Care, etc.)
  - Best practices
  - Standardized worksheet based on protocol
- Computerized process
- Pilot (July/Aug. 2013)
- Implementation (Jan. 2014)



## History: QAPI CoPs are not new...

#### An Eight Year Journey for Transplant QAPI \*



<sup>\*</sup>SIA=Systems Improvement Agreement



<sup>\*\*</sup>QSE's=Quality Survey Educators

# **Worksheet Methodology**



- Primarily retrospective review:
  - Transplant and Hospital QAPI documentation
  - Observational component as needed
  - "Tracer" methodology tracks improvement opportunities through the entire QAPI cycle as DEFINED BY THE ORGANIZATION
    - Improvement projects are "traced"
    - Adverse events are "traced"



# **Survey Worksheet Methods**



### Surveyor worksheet provides for:

- Review according to the INDIVIDUAL PROGRAMspecific plan, policies and procedure
- Documentation of "triggers" in written materials
- Observations and attendance during rounds or meetings
- Medical record reviews as needed (no set "sample" requirement)
- Patient interviews if needed
- Tracing of PI Projects and Adverse Events



#### REQUESTED ITEMS FOR REVIEW

### **Documents Requested Are Reflected in Worksheet Content**

1.	<ol> <li>An organizational chart of the transplant program and how the transplant</li> </ol>	QAPI program fits within the hospital structure;
2.	<ol> <li>☐ The written copy (2 copies – 1 for each surveyor) of the Transplant progr (QAPI) plan;</li> </ol>	ams Quality Assessment and Performance Improvement
3.	<ol> <li>☐ The written copy (2 copies – 1 for each surveyor) of the Hospitals Qualit</li> </ol>	y Assessment and Performance Improvement (QAPI) plan;
4.	4.   QAPI policies, processes and procedures if different than above (r	eview how they are created and maintained);
5.	<ol> <li>Identification of the responsible staff over the QAPI program and their quality</li> </ol>	alifications;
6.	<ol> <li>Any QAPI reports, records and minutes of QAPI committee meetings, or</li> </ol>	consultation reports about the QAPI program;
7.	7. Dog of Patient Complaints/Concerns/Grievances for the past 24 months a	nd corresponding documentation of investigation;
8.	<ol> <li>Log of any reported adverse events for the past 24 months and document action taken;</li> </ol>	ation of the investigation, analysis of events, and any follow-up
9.	9.   All indicators, measures, monitored items and items under surveillance for	or the past 3 years (all 3 phases of transplant / living donations);
10.	<ol> <li>Quality Reports: a) dashboards; b) scorecards; c) benchmarks; d) comparent</li> </ol>	ative national reports ; e) data resources utilized;
11.	11.   Policy / Protocol on complaints, adverse events and other occurrence or v	rariance reporting issues (2 copies - 1 for each surveyor);
12.	<ol> <li>All QAPI related documents (investigations, corrective action plans, performance selection criteria, hospital executive leadership involvement in program fund.</li> </ol>	
13.	<ol> <li>List of all transplant associated professional personnel and their titles;</li> </ol>	
14.	<ol> <li>List of and copy of any contracts with external parties that the hospital o transplantation;</li> </ol>	r transplant program have for services relevant to

#### PROGRAM ANALYSIS WORKSHEET

Sui	vey Agency Name:								
hav tho	Instructions: This worksheet is to be used during the survey to document the evidence obtained by the surveyor. Answer all questions and completely fill in all charts. Do not include any HIPAA sensitive data on this worksheet. Complete one worksheet for each of the hospital's transplant QAPI programs being surveyed. A transplant program may have many different organs under one QAPI program, which would require the completion of only one QAPI Worksheet. If there is more than one transplant QAPI program (i.e. horacic and abdominal QAPI programs), then more than one QAPI Worksheet will need to be completed. Separate transplant QAPI programs will have their own policies and procedures, staff and processes.								
	PART 1: QAPI PROGRAM INFORMATION								
2.	Transplant Hospital Name: Transplant Hospital Address: City / Zip: State:								
5.	Transplant Hospital Provider Number:								
6.	Survey Type: Focused QAPI								
7.	Region:								
	Surveyor Name(s):(mm/dd/yyyy)								
8.	Types of transplant program(s) covered by this Quality Assessment and Performance Improvement program								
	Adult kidney-only Adult liver  Adult pancreas Adult intestinal and/or multivisceral Adult heart-only Adult heart/lung Pediatric heart/lung Pediatric liver Pediatric liver Pediatric liver Pediatric intestinal and/or multivisceral Pediatric intestinal and/or multivisceral Pediatric intestinal and/or multivisceral Pediatric intestinal and/or multivisceral								

#### PART 2: QAPI DESIGN AND SCOPE

CONDITION Level Regulation: Transplant programs must develop, implement, and maintain a written, comprehensive, data-driven QAPI program designed to monitor and evaluate performance of all transplantation services, including services provided under contract or arrangement. (Tag X099)

Elements to be Assessed		Yes	No	Surveyor Notes
2.1 Does the Transplant program hav		Choo	se an	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
a written comprehensive QAPI	program?	ite	m.	
program:				
	2.1b Is there a clear linkage between	Choo		
	the transplant program's QAPI	ite	m.	
	program and the hospital's QAPI program?			
	program:			
	2.1c Are policies, procedures, QA	Choo	se an	
	measures and PI activities focused	ite	m.	
	on transplant (activities) processes			
	and outcomes?			
	2.1d Is the program implemented?	Chao		
	2.10 is the program implemented:	Choo		
	2.1e Has the QAPI program defined	Choo		Identify the methods / tools identified in the program:
	what Quality methods / tools will be	ite		identify the inchoos? tools identified in the program.
	used for QAPI activities?	100.	111.	
2.2 Does the OAPI program include e	valuation of all 3 phases (Continuum of	Choo	se an	
Care) for transplant and living donation	on? (pre. procedure. post) (as	ite		
appropriate)	Q, [ , [ , (	200	***	
2.3 Does the QAPI plan contain the	2.3a Design and Scope	Choo	se an	
5 key elements of a Quality	-	ite	m.	
structure:	2.3b Executive Responsibilities	Choo	se an	
	-	ite	m.	
	2.3c Feedback and Data Systems	Choo	se an	
	-	ite	m.	
	2.3d Analyses of Data	Choo	se an	
		ite	m.	
	2.3e Performance Improvement	Choo	se an	
	Activities	ite	m.	
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2.4 Is the program Data Driven?	Choose an	
	item.	
2.5 Are Benchmarks and Goals established using evidence based practices,	Choose an	
nationally recognized materials or the most current medical knowledge?	item.	
Elements to be Assessed	Yes No	Surveyor Notes
2.6 Are QAPI activities focused on process improvement(s) and patient	Choose an	
outcomes?	item.	
2.7 Is there MONITORING and EVALUATION of contracted services	Choose an	
connected to the transplant program? (enter N/A if there are no contracts)	item.	
List all transplant connected contract services below:		
2)		
3)		
4)		
(add more if necessary - determined at entrance conference)		
A C TED ANCED ANT CARE COAR STEELE	CH	TivB vB i tour v va
2.8 TRANSPLANT QAPI COMMITTEE:	Choose an	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
Does the written program identify the existence of a committee, list	item.	
committee membership by staff role/responsibility and identify the purpose		
of the committee?		
2.9 Does the QAPI committee meet according to programs policy and	Choose an	
procedures?	item.	
Monthly Operatorly		
Quarterly		
□ <u>Other</u>		

2.10 Is there multi-disciplinary team participation? (Check all areas in the box below to identify staff who are actively involved in committee meetings and functions; active participation should be defined by program policy on acceptable participation)			List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
Multi-Disciplin	ary Team		
Transplant Surgeons Transplant Physicians			
Director of Transplant	Transplant Clinic Nurse		
_Living Donor Advocate	Transplant Dietitian		
Transplant Pharmacist	Transplant Social Worker		
Transplant CoordinatorsDedicated QAPI Staff			
Transplant Floor Nurse	Transplant Administrator		
2.11 If there are multiple transplant	2.11a Is there a description of group's	Choose an	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
QAPI committees, QAPI sub-groups	purpose?	item.	
or a QAPI Steering committee /	2.11b Is the communication	Choose an	
council:	(reporting structure) between the	item.	
	QAPI group's defined?		100010121

Elements to be Assessed		Yes	No	Surveyor Notes
(enter N/A if question does not apply)	2.11c Do the group's meet as defined	Choo	se an	
	in the written program?	ite	m.	
	☐ Monthly			
	☐ Quarterly			
	☐ Other			
2.12 Describe how the transplant pro-	gram's QAPI information is	Descr	iption:	
communicated to the hospital's QAPI	program. (i.e. meetings, memos,			
emails, reports, etc.)				
2.13 Describe how the hospital's QAF	I information is communicated to the	Descr	iption:	
transplant QAPI program. (i.e. meetin	gs, memos, emails, reports, etc.)			
2.14 Describe how the transplant pro-	gram's QAPI information is	Descr	iption:	
communicated to the transplant staff.	(i.e. meetings, memos, emails, reports,			
letters, etc.)				
2 15 OHALITY ACCREEMENT	2.15a. Are the coloated measures	Chan	00.00	List Dominanta Daviannad / Title / Lancard Date and Date / Time / Time and Date / Time

,,			
2.15 OUALITY ASSESSMENT	2.15a Are the selected measures	Choose an	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
Is there a process defined to	OBJECTIVE? (i.e., fact based related	item.	
determine what objective measures	to patient care processes and		
the transplant QAPI program will	outcomes; not financial in nature,		
look at on a regular basis?	logistical in nature or ONLY the		
	minimum required by regulation to be		
	maintained)		
	2.15b Are the OBJECTIVE measures	Choose an	
	based on internally identified, high	item.	
	risk, high volume or problem prone		
	issues?		
	2.15c Do the OBJECTIVE measures	Choose an	
	include externally identified	item.	
	benchmarks? (best practice,		
	professional standards, evidenced		
	based science)		
	2.15d Are the OBJECTIVE measures	Choose an	
	focused on improving patient	item.	
	outcomes across the transplant		
	continuum of care?		
2.16 PERFORMANCE IMPROVEMENT	2.16a What process has been		e process / methods chosen: computer, paper, hotline, chart audits, data
Is there a defined process to identify	determined?	analysis, etc.	)
and track performance	2.16b Discuss how this	Discussion:	
improvement opportunities?	process/method connects to the QAPI		
	philosophy and organizational		
	culture?		

# **Survey Application**

### **Interpretive Guidelines**

X099 §482.96 Condition: <u>DEVELOP, IMPLEMENT & MAINTAIN</u> WRITTEN COMPREHENSIVE DATA-DRIVEN QAPI PROGRAM

The transplant program's portion of the QAPI program must:

Specifically address the individual components of the transplant program; and

- Include the participation of the transplant program's key personnel (Director, primary transplant surgeon, primary transplant physician, clinical transplant coordinator, and nursing personnel). Examples of their participation include participation in QAPI committee meetings, presenting topics to the QAPI committee, authoring reports or updates for the QAPI committee about the program's status.
- Broad representation of transplant program issues relevant for the disciplines represented in the multidisciplinary team (e.g., surgical, nursing, social services). This means that the QAPI would not solely be focused on a single discipline (e.g., the surgeon) and would include performance measures relevant for other disciplines.

### **Potential Findings**

- Participation of key team members is not evident
- Surgeon or Physician rarely attend
- Key members are not present when specialty materials are discussed
- Meeting minutes do not reflect member attendance
- There are no minutes of meetings ("but we have email evites")
- Committee meetings are frequently cancelled and never re-scheduled
- QAPI activities do not cover all aspects of the team members involvement (pharmacy, social services, etc.)

**Note:** If a given discipline is not specifically addressed, do not cite as a deficiency as long as: (1) the overall intent is still met that the QAPI program is comprehensive; and (2) there is no evidence in the survey that would identify this area as problematic.



#### PART 3: GOVERNANCE AND LEADERSHIP

Elements to be Assessed		Yes	No	Surveyor Notes
3.1 Has the formal Transplant QAI Governing Body?	3.1 Has the formal Transplant QAPI program been-approved by the Governing Body?		se an m.	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
	rogram maintained and made ace of its reviewed QAPI program s, including date(s) of review?	Choos		
3.2. Is there evidence of hospital leaknowledge of the transplant QAPI		Choos ites		
3.3 Can the transplant leadership p monitoring for each service related Continuum of Care? (including: inp	to clinical care across the	Choos ites		
3.4 Is there evidence that the hospital's governing body is involved in QAPI activities?	3.4a Approved the QAPI program indicators selected and the frequency of data collection?	Choo: iter		List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
	3.4b Ensures the QAPI program annually determines the number of distinct QAPI performance improvement projects to be conducted in the coming year?	Choosites		
	3.4c Actively reviews the results of QAPI data collection, analyses, activities, projects and makes decisions based on such review?	Choos		
3.5 Describe how hospital leaders transplant program to conduct QA		Descri	ption:	

# GOVERNANCE & LEADERSHIP



#### I – CORPORATE ACCOUNTABILITY

- -SENIOR LEADERSHIP
- -MIDDLE MANAGEMENT
- -FRONT LINE STAFF

#### II - OWNERSHIP

- -QAPI COMMITTEE
- -QAPI CHAIRPERSON
- -CLINICAL STAFF
- -SUPPORT STAFF
- -CUSTOMER

#### III - CULTURE

- -CONTINUOUS IMPROVEMENT FOCUS
- -ORGANIZATIONAL ETHICS
- -ORGANIZATION FUNCTIONS
- -COMMUNICATION
- -TRANSPARENCY
- -MANAGING CHANGE

#### IV – <u>INTEGRATED DELIVERY SYSTEM</u>

- -CONTINUUM OF CARE
- -PATIENT CENTERED
- -PURSUIT OF EXCELLENCE



#### PART 4: FEEDBACK, DATA SYSTEMS AND MONITORING

STANDARD Level Requiation: The transplant program's QAPI program must use objective measures to evaluate the program's performance with regard to transplantation activities and outcomes. (Tag X100)

<u>Step 1</u>: Identify a measure/indicator for each phase of transplant care for recipients and living donors (if the program has living donation services). Fill in the grid below to ensure that measures/indicators have been implemented in relation to each phase of transplant care.

Step 2: Select one (1) indicator from the grid below for each phase (for a total of 3) and conduct tracer activities to answer the following multipart questions.

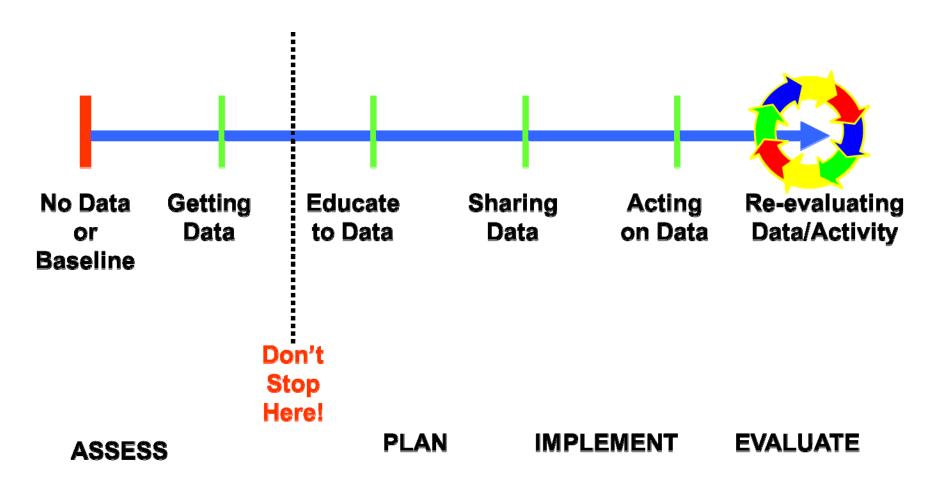
Focus on indicators that have been in place long enough for most questions to be applicable. The <u>TRACER</u> methodology will allow for an in-depth review of the indicator from dashboard/scorecard reports back to and through indicator measurement and development.

#### TRACER INDICATOR SELECTION (PROCESS AND OUTCOME MEASURES)

	PROCESS MEASU	JRES (measures that refl	ect sequen	tial steps to complete a task)		
PATIENT TYPE	PRE-TRANSPLAN	T/DONOR EVALUATION	TRA	ANSPLANT / DONATION	PC	OST TRANSPLANT / DONATION
RECIPIENT						
LIVING DONOR (if applicable)						
	OUTCOME	MEASURES (measures th	at relate to	a result or end of care)		
PATIENT TYPE	PRE-TRANSPLAN	T/DONOR EVALUATION	TRANSPLANT / DONATION		POST TRANSPLANT / DONATION	
RECIPIENT	ECIPIENT					
LIVING DONOR (if applicable)						
INDICATOR TRACER Indi				Indicator #2		Indicator #3
Insert the selected indicator from the grid to be traced: (ensure numerator and denominator is rational)						



# Where is the program in the process of tracking outcomes & quality issues?





# **Survey Application:**

The program needs defined data systems, methods of monitoring and reporting, to include:

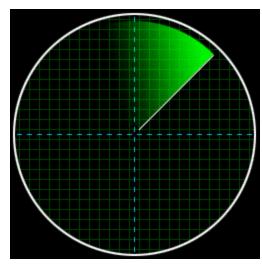
- Bi-directional communications structure (transplant/hospital; hospital/transplant)
- Proactive identification of quality indicators
- Effective surveillance to identify and respond to adverse events
- Ongoing data collection, tracking, and analysis across the continuum
- Data driven, defined and meaningful measures
- Benchmarks
- Targets/goals



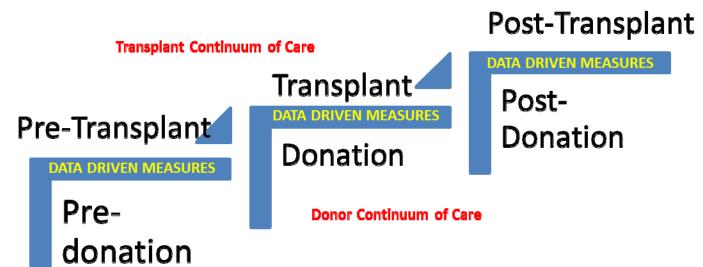
# WHAT'S ON THE RADAR

#### CURRENT IMPORTANT ISSUES IN THE WORLD OF TRANSPLANTATION

- IMMUNOSUPPRESSION
- SELECTION CRITERIA
- GRAFT SURVIVAL
- CARDIAC EVENTS
- INFECTIONS
- TECHNICAL COMPETENCY OF HARVEST TEAM
- PROPHYLAXIS RELATED TO IMMUNOSUPPRESSION
- SEROLOGY TESTING
- DELAYED GRAFT FUNCTION
- PATIENT EDUCATION
- FOLLOW UP VISITS
- RE-ADMISSIONS
- WAITLIST MANAGEMENT
- NUTRITION
- BLEEDING QUALITY OF ORGAN
- TEAM STRUCTURE AND TRAINING







There must be process and outcome measures in all phases of transplant and living donation

		Day of the last of		
TRANSPLANT	PHASE		Living Donation	PHASE
News	PROCESS -	1	Mania	PROCESS -
	PRE Transplant			PRE Donation
Mana	OUTCOME -		) Machinia	OUTCOME -
	PRE Transplant			PRE Donation
Mana	PROCESS -	1	Kars	PROCESS -
	Transplant			Donation
1 M. COMP. M.	OUTCOME -	1	Bloms	OUTCOME -
	Transplant			Donation
K.C.	PROCESS -	1	Reme	PROCESS -
	POST Transplant			POST Donation
Bazana	OUTCOME -	1	Kiana	OUTCOME -
	POST Transplant			POST Donation

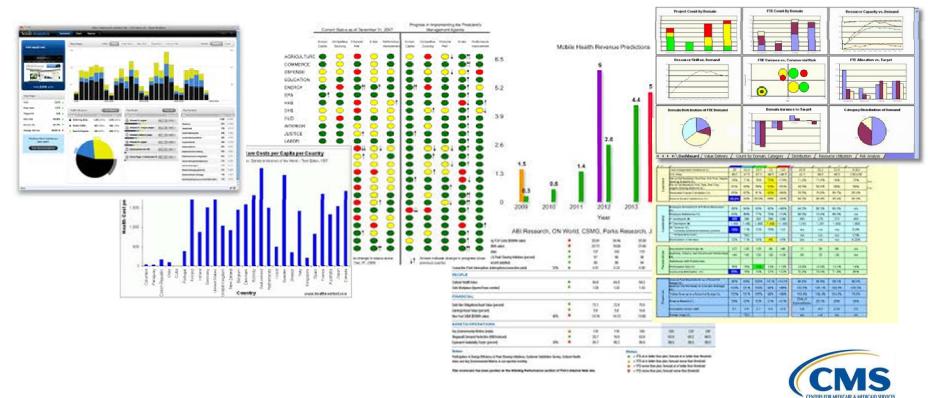


# DRIP, DRIP, DRIP

Consider if the program is

Data Rich Information Poor (DRIP)

or are they actually using the
information to make improvements?



# Tracking Improvements

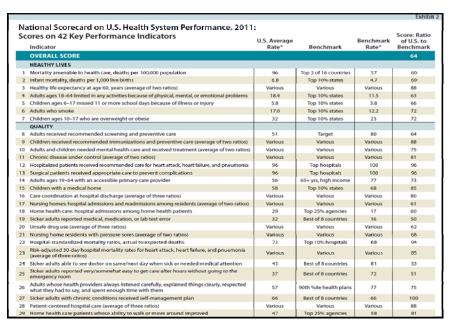
A means to track improvements IS required

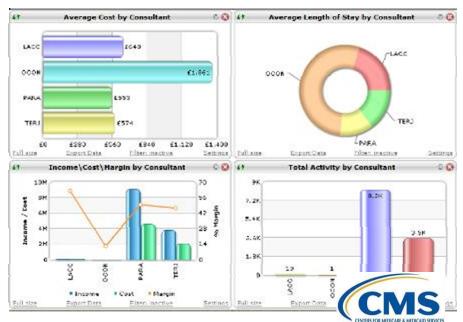
Benchmarking, Dashboards and Scorecards are <u>not</u> interchangeable terms/items. Is there <u>analysis</u>, <u>evidence of actions</u> taken in response and sustained activity?

#### SCORECARD EXAMPLE

#### DASHBOARD EXAMPLE

Tabular Format, compares to target/benchmark, often color coded to "stoplight" format (Green=target met; Yellow=caution; Red=Target not met) Multiple copies of "data over time" graphs with snapshot analysis, often with action/evaluation noted





INDICATOR TRACER	Indicator #1	Indicator #2	Indicator #3
Insert the selected indicator from the grid to be traced:  (ensure numerator and denominator is rational)			

Elements to be Assessed	Yes o	or No	Yes	or No	Yes	or No
4.1 Is the program using objective measures to evaluate the program's performance related to activities and	Choose an item.					
outcomes?		item.		nem.		
	Surveyor Notes:		Surveyor Notes:		Surveyor Notes:	
4.2 Is the indicator defined and understood by all transplant staff?	Choose an					
transplant statt.	item.	item.	item.	item.	item.	item.
4.3 Describe what the indicator is based upon.	Description:		Description:		Description:	
4.4 Is the scope of the indicator specific to transplant patients and not general hospital patients? (e.g., falls,	Choose an item.		Choose an item.		Choose an item	
surgical site infections, medication errors).		<del></del>			CHOOSE	tur recur.
4.5 Is appropriate data being captured for selected indicator? (data sources, frequency, type and unit of	Choose	an item.	Choose	an item.	Choose	an item.
measure, method of collection) (does the data answer/fit the indicator)						
4.6 Is there evidence of late, incomplete or incorrect data collection? (example: missing data on dashboards,	Choose	on item	Choose	an item.	Choose	an item
gaps in graphs/charts)	Choose	an nem.	CHOUSE	an Rent.	CITOOSC	THE STATE OF THE S
						6146

4.7 How does the program ensure data reliability? (if more than one person is collecting) (is there cross training, cross coverage, provided education)	Choose an item.	Choose an item.	Choose an item.
4.8 Did the program collect the data they said they were going to?  (look for raw data; something more substantive than charts and graphs)	Choose an item.	Choose an item.	Choose an item.
4.9 Are the collected data analyzed to explain improvements, deficits, or other conclusions?	Choose an item.	Choose an item.	Choose an item.
4.10 When feasible, are aggregated data broken down into subsets that allow comparison of performance within the program? (i.e., individual surgeon graft loss, graft loss by patient age/sex, waitlist denials by age/sex/demographics)	Choose an item.	Choose an item.	Choose an item.

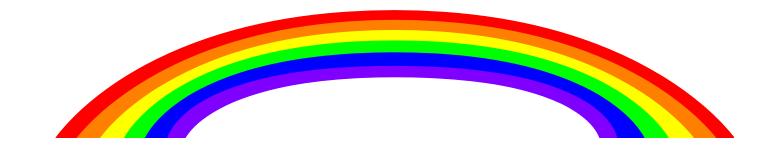
4.11. Is there evidence that the program took action			-
based on the analysis of collected data?	Choose an item.	Choose an item.	Choose an item.
4.11a Is there evidence that the action(s) taken towards improvement were communicated	Choose an item.	Choose an item.	Choose an item.
(education provided) to staff throughout the entire continuum of care (inpatient, outpatient) as appropriate?			
4.12 Are interventions or actions evaluated for success?	Choose an item.	Choose an item.	Choose an item.
4.13 If interventions taken were not successful, were new interventions developed?	Choose an item.	Choose an item.	Choose an item.
4.14 If interventions were successful, how does the program determine the improvement was sustainable?	Choose an item.	Choose an item.	Choose an item.

#### PART 5: PERFORMANCE IMPROVEMENT ACTIVITIES TRACER

<u>STANDARD Level Requiation</u>: The transplant program must take actions that result in performance improvements and track performance to ensure that improvements are sustained. (Tag X101)

Elements to be Assessed	Yes	No	Surveyor Notes
5.1 Can the program provide evidence that its improvement activities focus on areas that are high risk (severity), high volume (incidence or prevalence), or problem-prone?			List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
5.2 Can the program provide evidence that it conducts transplant specific performance improvement projects?	Choo	se an m.	
Elements to be Assessed	Yes	No	Surveyor Notes
5.3 Do the performance improvement projects reflect the scope and complexity of the transplant program's services and operations?	Choos		
5.4 Does the project include multi-disciplinary team members, transplant leadership members and where feasible, hospital leadership members?	Choos iter		
5.5 Can the program provide evidence showing why each project was selected?	Choos		

5.6 Do performance improvement projects (PIPs) include the core components	5.6a Is there documentation that a problem or opportunity for improvement was identified and defined?  5.6b Is there documentation that	Choose an item.	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
necessary for the transplant program to take	goals were established for the project?	item.	
action and sustain improvement:	5.6c Is there evidence that QAPI tools were selected and utilized as defined by the program?	Choose an item.	
	5.6d Is there documentation that data was selected and a method for collection defined?	Choose an item.	
	5.6e Is there evidence that data was collected as defined?	Choose an item.	
	5.6f Was the data analyzed as defined?	Choose an item.	
	5.6g Is there evidence that improvement actions were implemented?	Choose an item.	
	5.6h Is there documentation that monitoring of improvement actions occurred?	Choose an item.	
Elem	ents to be Assessed	Yes No	Surveyor Notes
	5.6i Is there documentation that follow-up analysis of implemented actions and data	Choose an item.	
	were conducted to determine if the improvements were sustained?		CMS

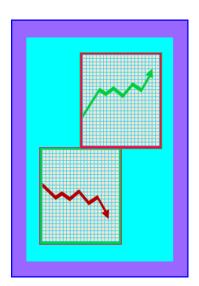


# **Did the program Define the Opportunity?**

## Types of Opportunities

- Defects/Errors
- Time/Delays
- Cost/Re-Work/Waste

Did the project want to increase or decrease occurrence?





# 482.96(a) Actions to Improve Performance/Tracking

"The transplant center must take actions that result in performance improvements and track performance to ensure that improvements are sustained."

Interventions must be evaluated and monitored for <u>sustained</u> <u>change:</u>

- How is success being measured?
- What is being measured?
- How are measures defined?
- Reported to (whom/where)?



# 482.96(a) Actions to Improve Performance/Tracking

- What does the <u>written</u> program say about sustaining improvement?
- Is there a documentation method to capture baseline performance, actions taken in response to analysis of performance and monitoring of sustained performance to target?
- Does the program use this method?
- Are there opportunities identified that do not have any follow up or data or associated QAPI activity?



#### PART 6: ADVERSE EVENT (AE) TRACER

STANDARD Level Regulation: A transplant program must establish and implement written policies to address and document adverse events that occur during any phase of an organ transplantation case. The policies must address at a minimum, the process for the identification, reporting, analysis and prevention of adverse events. (Tag X102)

Elements to be	Assessed	Yes	No	Surveyor Notes
	6.1 Are there written <u>adverse event</u> (AE) policies and procedures specific to transplant?		an item.	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
6.2 Are AE evaluated according procedures?	ng to policies and	Choose	an item.	
6.3 Can transplant staff descr an adverse event (AE) in tran		Choose	an item.	
6.4 Can transplant staff ex whom they report an adverse		Choose	an item.	
6.5 Does the hospital/program addition to staff incident report adverse events?		Choose	an item.	
6.6 Can the program provide events identified through staf addressed?		Choose	an item.	
adverse event policy (a	7a For each organ type. pproved and being rveyed)	Choose	an item.	
reporting structures: co	7b Staff reporting and mmunication methods ithin the transplant ogram and hospital.	Choose	an item.	



Elements to	be Assessed	Yes	No	Surveyor Notes
	6.7c Process for	Choose	an item.	
	disclosure of AE's to the			
	patient(s) (or family).  6.7d Process and timeline	C1	:4	
		Choose	an item.	
	for reporting adverse events to required public,			
	state and federal agencies.			
	(OPO, OPTN, State, CMS,			
	etc.)			
	6.7e Is there evidence that	Choose	an item.	
	the transplant program has			
	adopted policies			
	supporting a non-punitive			
	approach to staff reporting			
	of events and situations			
600 1 10 10	they consider unsafe?	CH	*.	
6.8 Does the written policy severity of events that are		Choose	an item.	
severity of events that are	tracked and analyzed:			
6.9 Does the program	6.9a Who is responsible	Choose	an item.	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):
have a defined analysis	for conducting the AE	CHOOSE	that attendant.	
method / process for	analysis.			
adverse events (AE)				
including:	6.9b What types of	Choose	an item.	
	events that will be			
	reviewed.			
	6.9c Actions taken to	Choose	an item.	
	prevent similar adverse			
	events.			
	6 0d Mathad for fallers	Chann	an itam	
	6.9d Method for follow up and evaluating actions	Choose	an item.	
	taken			
•	Directi	•		

1					
6.10 Describe which method(s) will be utilized to analyze adverse events (AE's).	Description of methods/tools:				
6.11 Has the program/hospital conducted any	Choose an item.				
adverse event analysis in the past 24 months?	CHOOSE all REIII.				
adverse event analysis in the past 24 months.					
If yes – complete adverse event analysis tracer below					
If no – determine if the program had any deaths or					
graft failures. Is there another type of investigation /					
analysis performed for these events? (proceed with					
tracer to determine if deaths and graft failures attempt					
to identify the cause of the event)					
6.12 Did the analysis of the adverse event address all	Choose an item.				
appropriate areas across the continuum of care?	choose an item.				
Adverse Event Analysis					
(i.e., no unanswered questions or unresolved					
conflicting information - the findings were explained,					
and the program considered underlying systems,					
processes and review of literature)					
6.12 Has the manner (benefit luncioned	Chassa sa itawa	List Description A (Title 1			
6.13 Has the program/hospital reviewed or compared completed adverse event analysis to	Choose an item.	List Documents Reviewed (Title, Approval Date and Date/Time reviewed):			
similar past events in an attempt to identify links or					
causal relationships to event outcomes?					

STANDARD Level Requiation: The transplant program must conduct a thorough analysis of and document any adverse event. (Tag X103) The transplant program must utilize the analysis to effect changes in the Transplant Program's policies and practices to prevent repeat incidents. (Tag X104)

Instructions: If the answer to Question 6.11 is "YES", select three (3) (or as many as available) causal analyses the program has completed for adverse events or near misses (close calls) during the last 24 months. Analyses may be of a single event or a group of similar types of events. ANSWER EACH QUESTION FOR EACH ANALYSIS

#### ADVERSE EVENT TRACER ANALYSIS

Elements to be Assessed	Yes / No	Yes / No	Yes / No
ADVERSE EVENT TRACER	Investigation #1	Investigation #2	Investigation #3
Write in the selected investigation. (use a identifier			
code or other means to avoid capturing PHI or			
identifiable information on this worksheet).			

E	lements to be Assessed	Yes / No	Yes / No	Yes / No
6.14 Did the	6.14a Primary root cause(s).	Choose an item.	Choose an item.	Choose an item.
thorough analysis identify:		Surveyor Notes:	Surveyor Notes:	Surveyor Notes:
(select all that may apply)	6.14b Special or underlying cause(s).	Choose an item.	Choose an item.	Choose an item.
	6.14c Contributing factors to the event. (ensure that the entire continuum of care was considered in the review)	Choose an item.	Choose an item.	Choose an item.
			and a	



6.15 Did the program	6.15a Specific chronology of the incident/event covering the entirety	Choose an item.	Choose an item.	Choose an item.
thoroughly document the	of the Continuum of Care.			
root causes to include:	6.15b Interview with all relevant staff involved.	Choose an item.	Choose an item.	Choose an item.
	6.15c Interview with relevant external parties. (e.g., OPO,	Choose an item.	Choose an item.	Choose an item.
	referring physicians)			
	6.15d Review of all relevant policies and procedures and identification of	Choose an item.	Choose an item.	Choose an item.
	any variation that occurred.			
	6.15e Any contextual factors related to the environment. (e.g., staff schedules, bed availability,	Choose an item.	Choose an item.	Choose an item.
	equipment, systems, other human factors)			
	6.15f Rate of occurrence and common factors for the same /	Choose an item.	Choose an item.	Choose an item.
	similar event(s)?			

Elements to be Assessed	Yes / No	Yes / No	Yes / No
6.16 Did individual(s) with authority to make decisions about the transplant program participate in the analysis of the adverse event?	Choose an item.	Choose an item.	Choose an item.
6.17 Are there specific recommendations/action	Choose an item.	Choose an item.	Choose an item.
steps that resulted from the analysis?	Choose an item.	Choose an item.	Choose an item.
6.18 Were potential areas to <u>prevent</u> repeat incidences identified?	Choose an item.	Choose an item.	Choose an item.
6.19 Has the program developed and implemented preventive actions based on the analysis in at least one area?	Choose an item.	Choose an item.	Choose an item.

6.20 Has the program evaluated the impact of the preventative actions, including tracking re-occurrences of similar events?	Choose an item.	Choose an item.	Choose an item.
6.21 If intervention(s) did not meet established goals; did the program implement a revised intervention / action?	Choose an item.	Choose an item.	Choose an item.
6.22 Has the program implemented preventative actions determined to be effective utilizing similar processes / at similar risk.	Choose an item.	Choose an item.	Choose an item.



Quality means doing it right when no one is looking.

Henry Ford

Lance Corporal Myles Kerr with 9 y.o. Brandon Fuchs finishing the Jeff Drenth Memorial 5K in Charlevoix, Michigan. The marine sacrificed his leading spot in the race after seeing the child was struggling to keep up. 200,000 twitter hits later, his response was, "I was just doing what any man would do." ABC News 08/01/13

# **QAPI** Resources...

		rganization	
Agency for Healthcare Research and Quality	Delmarva Foundation	MedWatch (FDA Safety Information and Adverse Event Reporting System)	Thomson Reuters top 100 hospitals
Agency for Health Care Research and Quality (AHRQ) patient safety information	FDA Patient Safety News	Missouri Center for Patient Safety	University Health System Consortium
AHRQ Health Care Innovations Exchange	Georgia Hospital Association Partnership for Health and Accountability	National Committee for Quality Assurance	United Network for Organ Sharing (UNOS)
Agency for Health Care Research and Quality Web M&M	Healthgrades	National Patient Safety Foundation	US News & World Report
American Hospital Association	Hospitals Compare	National Quality Forum (NQF)	USP Center for Advancement of Patient Safety (CAPS)
American Society of Healthcare Risk Management	Institute for Healthcare Improvement	National Safety Council	U.S. Pharmacopeia
PSNet - Patient Safety Network	The Institute for Safe Medication Practices	National Transportation Safety Board	Urgent Matters (Hospital Patient Flow)
American Society of Health- System Pharmacists	The Leapfrog Group for Patient Safety	New Jersey Patient Safety Newsletters, Alerts and Summary Reports	US Dept. of Veterans Affairs (VA) National Center for Patient Safety
The Anesthesia Patient Safety Foundation	Johns Hopkins University Quality & Safety Research Group	Oregon Patient Safety Commission	World Health Organization World Alliance for Patient Safety
Aviation Safety Reporting System	The Joint Commission	Organ Procurement and Transplantation Network (OPTN)	World Health Organization Surgical Checklist & Toolkit – Safe Surgery Saves Lives
California Hospital Patient Safety Organization	Joint Commission Collaborating Center for Patient Safety Solutions	Pennsylvania Patient Safety Authority	
Centers for Medicare & Medicaid Services	Maryland Health Care Commission	Premier	
Consumers'CHECKBOOK (Health and Healthcare)	Maryland Hospital Association	Quality Indicators Project	
Dartmouth Atlas of Health Care	Massachusetts Coalition for the Prevention of Medical Errors	Foundation for Health Care Quality	

