The Role of Medical Directors

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• DaVita, Inc.
Disclosures

• **DaVita, Inc**
  • Employee and stockholder

• **Affymax**
  • Member of the Scientific Advisory Board
Sources

• Conditions for Coverage
  • Rules and standards governing end-stage renal disease (ESRD) facilities

• Interpretative Guidance
  • Point-by-point interpretation of each condition

• Measures Assessment Tool
  • Audit checklist for surveyors
Conditions for Coverage

• Defines 16 conditions which must be met in order for ESRD facilities to receive Medicare coverage

• Failure to meet one or more of the conditions may lead to closure of a facility

• Medical Director accountability is defined in multiple conditions
  • Conducting Quality Improvement
  • Infection Control
  • Governance
  • Medical Directors
Termination of Medicare Coverage

(a) “... failure of a supplier of ESRD service to meet one or more conditions for coverage set forth in part 494 will result in the termination of Medicare coverage... ”

(b) “... [can be] based solely on supplier’s failure to participate in network activities and pursue network goals as required at §494.180(i) of this chapter... ”

Conditions for Coverage § 488.604

You are Responsible for...

• Quality
• Safety
• Policy and procedure
• Training and education
• Patient rights
Your Roles as Medical Director

• **Coach to the Interdisciplinary Team (IDT)**
  • Patient assessments and care plans
  • Managing the disruptive patient

• **Clinical leader**
  • Quality Assessment and Process Improvement (QAPI) Team
  • Governing body

• **Member of facility governing body**
  • Medical Director, Facility Administrator (Chief Executive Officer [CEO]), and Corporate Representative
Teams
Organization of Quality and Safety In ESRD Facilities
Care Team

Patient

Attending Physician

Dietitian

Social Worker

RN

PCT

Biomed, Reuse Tech

PCT, patient care technician. RN, registered nurse.
Interdisciplinary Core Team

- Physician
- Dietitian
- Social Worker
- RN
Interdisciplinary Core Team (IDT)

- Attending Physician
- Social Worker
- Dietitian
- RN
- Patient

• Includes attending physician and patient for assessment and care-planning process
Governing Body

- Problem-solving team

- CEO
- Corp Rep
- Medical Director
The Medical Director is Accountable to the Governing Body

“The medical director is accountable to the governing body for the quality of medical care provided to patients.”

Conditions for Coverage § 494.150

Problem: Underperforming Medical Director

• The Medical Director attends QAPI infrequently, prefers just to sign forms. The central venous catheter (CVC) rate is chronically high, as is Hb < 10 and Kt/V < 1.2.

• To whom is the Medical Director accountable?

• What are the options to address underperformance?
“The medical director is accountable to the governing body for the quality and safety of care provided...”

Conditions for Coverage 494.150

Response to Underperformance

- Identify & Analyze
- Plan of Correction
- Monitoring for Success
Underperformance: First Principles

• **Address**
  • Early
  • Directly
  • Specifically

• **Plan of correction**

• **Monitor**

• **Escalate if unsuccessful**
Patient Assessments: Performance Starts Here

- Quality of Life
- Nutrition
- Vascular Access
- Mineral Bone Disease
- Dialysis Adequacy
- Transplant & Modality Education
- Water Quality
- Patient Satisfaction
- Anemia
- Dialysate Delivery
- Dialyzer Reuse
- Infection Control
Patient Assessments: Many Eyes

RD, registered dietician. SW, social worker.
Assessments and Care Plans: Your Role

• Teach
• Hold team accountable
• Help team coordinate with attendings
• Address underperformance
• Recognize excellence
QAPI is a Data-Driven Search for Problems

- Monitor
- Trend
- Identify
- Analyze
- Plan to Correct

Percent of Patients

Jan Mar May Jul Sep Nov
Case Study: Underperforming Team Member

• **Problem:** Kt/V blood draws are incorrect

• **Questions:**
  • Who is accountable?
  • How is this problem identified?
  • How addressed?
Medical Director oversight of facility staff derives from process, evidence, policy & procedure, training
QAPI Identifies Low Kt/V Problem

- Trend Analysis
- Root Cause Analysis
- Plan of Correction
Tools for Root Cause Analysis

Audits

Disease Management Reports
Tools for Root Cause Analysis

Policies & Procedures

Training Manuals
Escalate Unsolved Problems to the Governing Body

Patient Assessments & Care Plans → QAPI → Governing Body
Plan of Correction Unsuccessful?

• Escalate to Governing Body
Keep Your Team Ready

- Fire
- Pyrogen reaction
- Acute cluster reactions
- Water alarms
- Seroconversions
- Disruptive patient
Final Must-Dos

• Become an expert in water treatment for your facility
• Ask for an orientation to your roles and responsibilities as Medical Director
• Understand your role in managing physician underperformance or physician disruptive behavior
• Learn the Networks-specified approach to the disruptive patient