

ASN Dialysis Advisory Group

ASN DIALYSIS CURRICULUM

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The Role of Medical Directors

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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

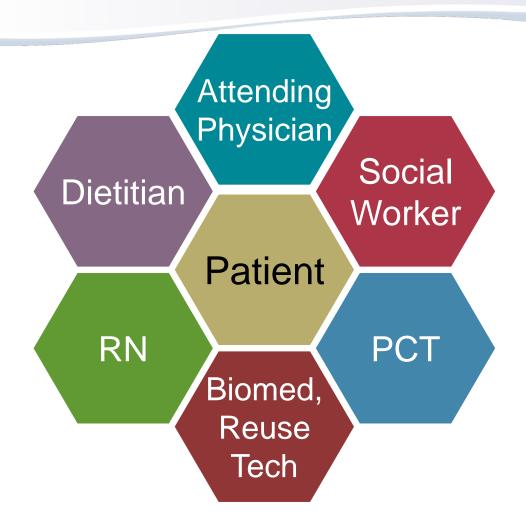
Member of facility governing body

 Medical Director, Facility Administrator (Chief Executive Officer [CEO]), and Corporate Representative

Teams

Organization of Quality and Safety In ESRD Facilities

Care Team



PCT, patient care technician. RN, registered nurse.

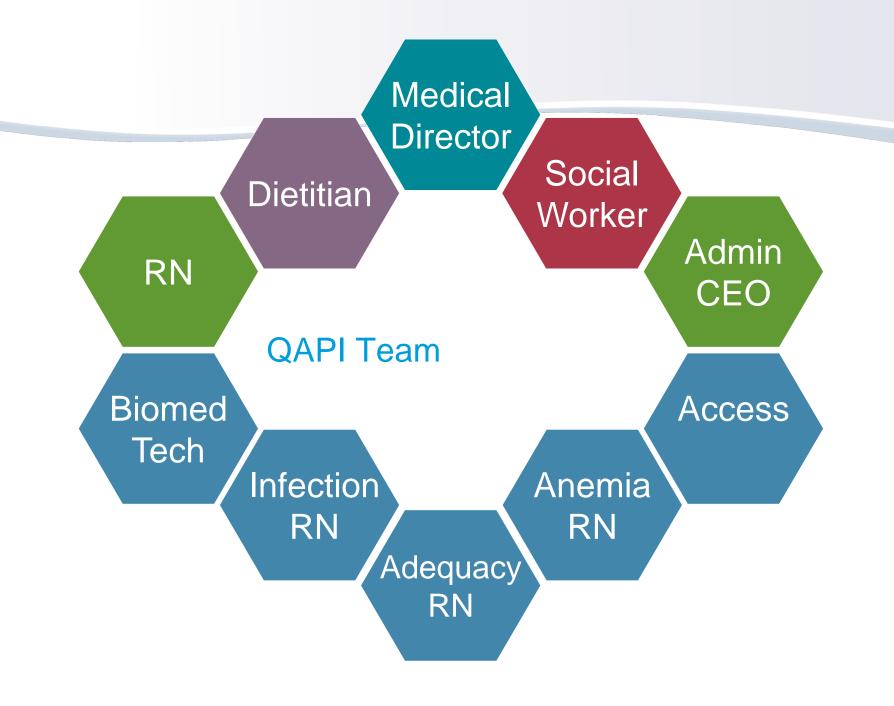
Interdisciplinary Core Team



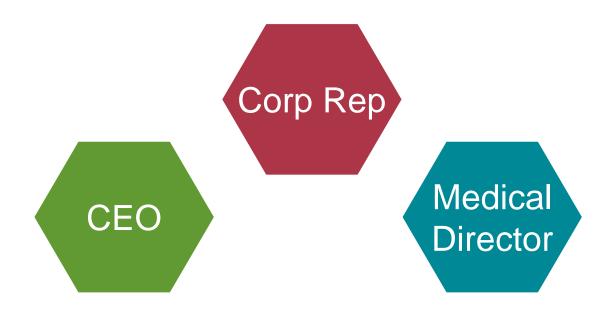
Interdisciplinary Core Team (IDT)



 Includes attending physician and patient for assessment and care-planning process



Governing Body



Problem-solving team

The Medical Director is Accountable to the Governing Body

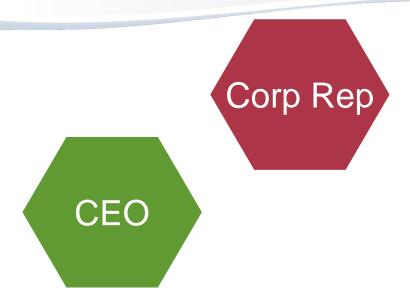
"The medical director is accountable to the governing body for the quality of medical care provided to patients."

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?

Governing Body

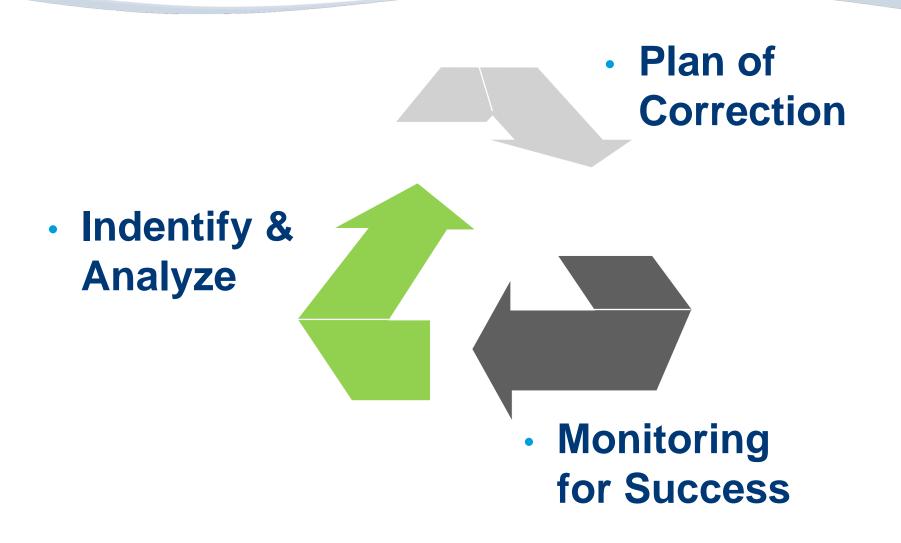


"The medical director is accountable to the governing body for the quality and safety of care provided..."

Conditions for Coverage 494.150

Centers for Medicare & Medicaid Services. Conditions for Coverage for End-Stage Renal Disease Facilities; Final Rule. https://www.cms.gov/cfcsandcops/downloads/esrdfinalrule0415.pdf.

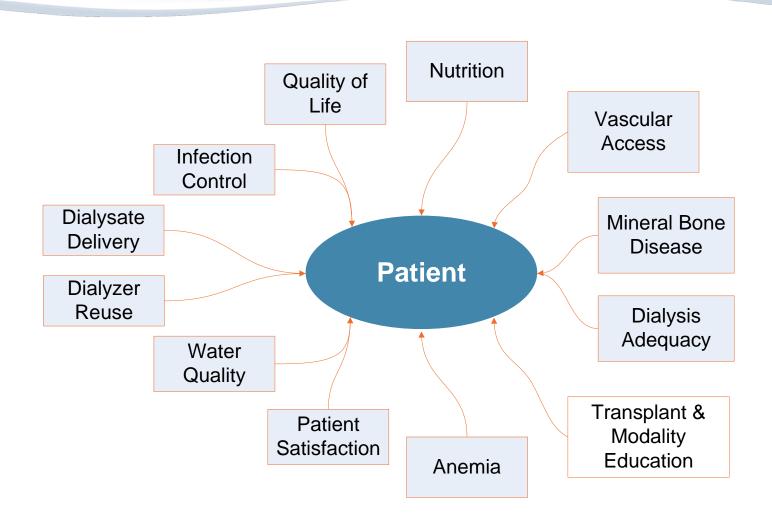
Response to Underperformance



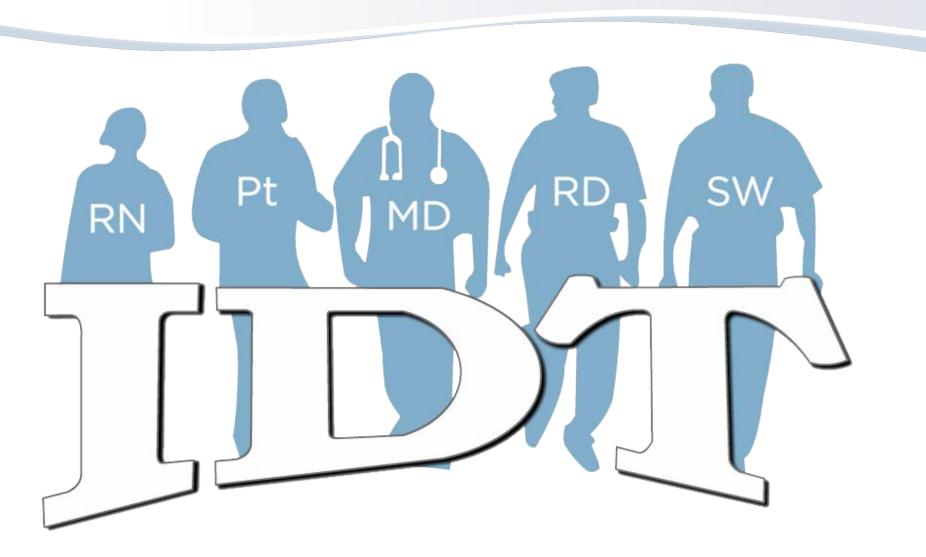
Underperformance: First Principles

- Address
 - Early
 - Directly
 - Specifically
- Plan of correction
- Monitor
- Escalate if unsuccessful

Patient Assessments: Performance Starts Here



Patient Assessments: Many Eyes

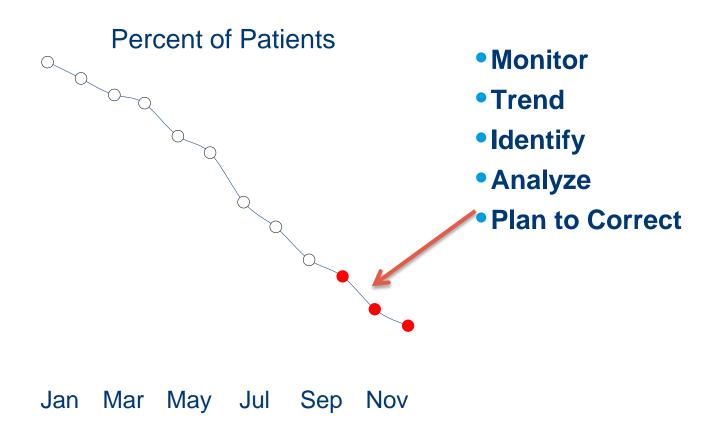


RD, registered dietician. SW, social worker.

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

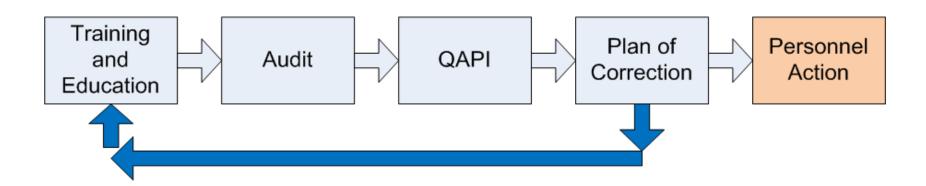


Case Study: Underperforming Team Member

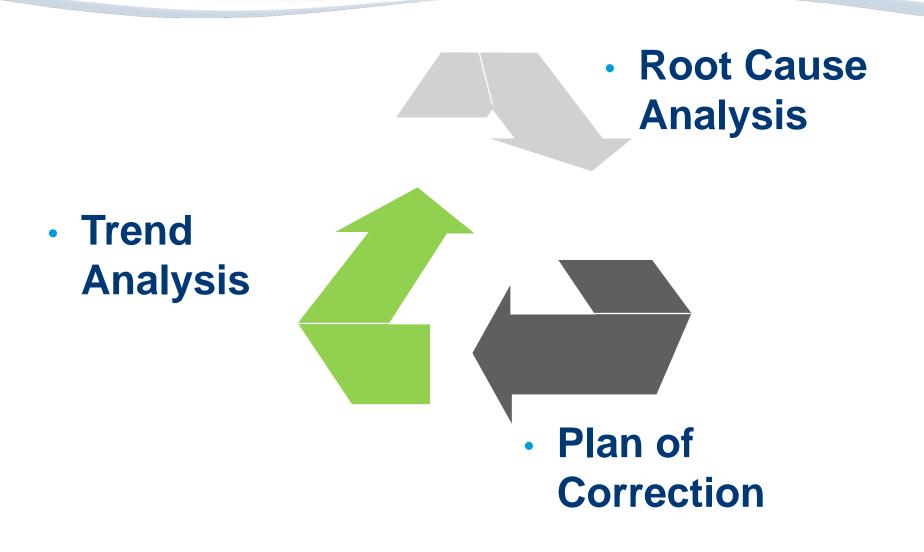
- Problem: Kt/V blood draws are incorrect
- Questions:
 - Who is accountable?
 - How is this problem identified?
 - How addressed?

Medical Director Oversight of Facility Staff

 Medical Director oversight of facility staff derives from process, evidence, policy & procedure, training



QAPI Identifies Low Kt/V Problem



Tools for Root Cause Analysis

Audits

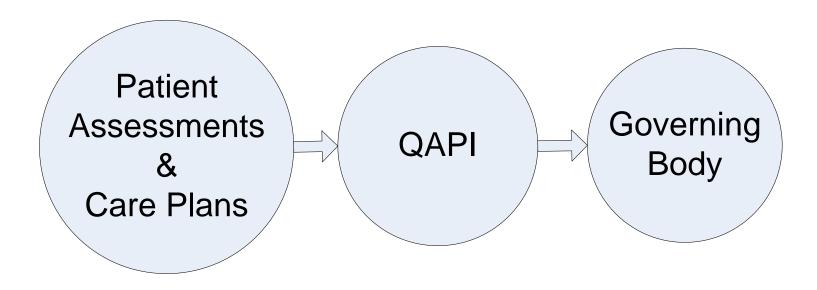
Disease Management Reports

Tools for Root Cause Analysis

Policies & Procedures

Training Manuals

Escalate Unsolved Problems to the Governing Body



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