

## Considerations for Health Care Organizations

For Consideration	Site Visit Review
<b>Dual Leadership Structure</b>	<p>Health care organizations often have both an administrative structure and a medical/physician leadership structure. Both should be reviewed in category 1 (see Note 1.1).</p> <hr/> <p>The site visit team may explicitly need to request the medical leadership organizational chart, as it may not be included with the applicant organizational chart. Both the administrative leadership and the medical leadership should be interviewed on-site separately and together.</p>
<b>Governance/Board of Directors (BOD)</b>	<p>Often in health care organizations, the BOD is very involved, so examiners should expect to read more in 1.2a about the board's involvement in the governance system.</p> <hr/> <p>The site visit team should expect to interview someone from the BOD about governance issues. If the BOD is meeting during the site visit, examiners may be able to observe the meeting.</p>
<b>Partnerships/Joint Ventures</b>	<p>There is a growing trend in health care organizations to enter into joint venture relationships that present legal and economic issues.</p> <hr/> <p>The site visit team should clarify these relationships, including the role these joint ventures or other partnerships play in the success and sustainability of the applicant.</p>
<b>Community Support vs. Community Health</b>	<p>In the Business and Education Criteria, community support focuses on how an organization leverages its core competencies to improve its community; however, health care organizations are expected to go beyond supporting and strengthening their key communities and directly impact and improve the health of the population of the communities they serve (these might include population screening programs, health education programs, immunization programs, unique health services provided at a financial loss, sponsorship of safety programs, and indigent care and other community benefits). See Note 1.2c(2).</p> <p>Note: the applicant defines its key communities.</p>
<b>Safety (Patient, Staff, Community)</b>	<p>Patient safety and the culture of safety have risen to be areas of national importance in health care. Scorebook comments on patient safety should be addressed in 1.1a(3) and 6.2c(1). Patient safety might also be commented on in 3.2a(1) if it relates to key patient, other customer, and stakeholder requirements and expectations of your health care services described in P.1b(2). Safety requirements for staff should be addressed in 5.1b(1) and environmental well-being for the</p>

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	community in 1.2c (examples might include collaboration to conserve the environment or natural resources).
<b>Workforce Paid by a Third Party and Volunteers</b>	<p>See Note 5.1 for a summary of the many types of people included in the term “workforce.” All people actively involved in accomplishing the work of the organization should be considered part of the workforce. All persons who provide a service on behalf of the health care organization may be interviewed, including medical, nursing, and ancillary services students, as well as contractors.</p> <hr/> <p>Note: Site visit team leaders may wish to request from the organization’s official contact point (OCP) a list of all people actively involved in accomplishing the work of the organization that were not included on organizational charts. They may request this list by asking for the internal employee and staff directory or by asking specifically for others not included on the organizational charts.</p>
<b>Are Physicians Staff, Partners, Suppliers, Customers, Contractors, or a Little of Both?</b>	<p>Physicians play multiple roles within health care organizations, and health care organizations may call them staff, partners, suppliers, contractors, and even customers. Yet, they are definitely part of the organization’s workforce (see Note 5.1 and the definition of “workforce”) because they provide care in the name of the organization. In almost any health care organization, physicians as a segment are critical; therefore, it is fair to expect the organization to provide segmented data on their expectations, requirements, satisfaction, etc., as the applicant would be expected to do for any workforce segment.</p> <hr/> <p>On-site, the team may encounter physicians called “hospitalists.” Hospitalists are specialists <i>employed</i> or contracted by the health care organization to manage the care of hospitalized patients in the place of the admitting physician, who may be considered a supplier, contractor, or partner depending on how the organization chooses to designate him or her. Intensivists are specialists employed or contracted by the health care organization to manage patients admitted to the Intensive Care Unit (ICU). “Nocturnists” are hospitalists that care for patients during the night shift and generally turn these patients over to Hospitalists the next day for continued care. “Laborists” are OB physicians dedicated to the hospital to care for mothers in the Delivery Suite. The team may interview hospitalists, intensivists, nocturnists, laborists as well as other physicians including residents and medical students.</p>
<b>Contractors Providing Services</b>	<p>Often within health care organizations, contractors may provide services in the name of the organization on-site (e.g., the Emergency Department, Dialysis Units, Housekeeping, Food Service or an outpatient clinic). From the applicant’s response in 2.1a(4) and P.1b(3) of the Organizational Profile, examiners should be able to gain a clear understanding of what services are provided by the applicant and by contractors, and how the two entities interface.</p> <hr/> <p>On-site, contractors can be interviewed if patients partake of these services thinking they are receiving the services of the health care organization. Assuming the interview questions answer site visit issues (SVIs), suggested questions may focus on</p>

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	<p>what metrics the contractor measures and shares with the organization, what care is provided by the contractor, how the contractor communicates with the organization, etc. The site visit team might also explore how the applicant oversees the contractor’s approach to addressing requirements in categories 3, 5, and 6. The site visit team is trying to verify deployment of the applicant’s approaches and to ensure that the contractor’s approaches are aligned with the applicant’s.</p>
<b>What Patient Data Can Examiners Review?</b>	<p>Examiners may view aggregated or blinded patient data on-site. The Health Insurance Portability and Accountability Act (HIPAA), the patient privacy act, prohibits the hospital from sharing data on an individual patient. Any individual patient documentation should be avoided. Participating in rounding discussions of an individual patient is also prohibited. Examiners may not look at an actual patient’s electronic health record when requesting a demonstration of the EHR system.</p>
<b>Publicly Reported Data</b>	<p>Numerous organizations including the Joint Commission, DNV-GL, Healthcare Facilities Accreditation Program (HFAP), National Committee for Quality Assurance (NCQA), and Centers for Medicare and Medicaid Services (CMS) sponsor voluntary or required public recording of data.</p> <p>For example, the Joint Commission and CMS require reporting of clinical process measures called core measures. They share core measures organized in condition-specific bundles – acute myocardial infarction (AMI), pneumonia (PN), Immunizations (IMM) , and surgical care improvement project (SCIP). The Joint Commission has 2 additional categories. Given a 50-page limit and an organization’s key factors and strategic plan, applicants may not include all measures in their application.</p> <p>NCQA uses Healthcare Effectiveness Data and Information Set (HEDIS) measures for health results of screening and tests related to preventive health care and condition-specific care for insured populations. HEDIS measures are commonly used by insurers and out-patient providers (e.g. diabetes care measures, immunizations, medication compliance for asthma or blood pressure). Item 7.1 asks applicants to include and indicate results for key measures that are publicly reported and/or mandated by regulatory, accreditor, or payor requirements. See the second Note 7.1 for specific examples.</p> <p>Site visit teams should verify publicly reported or mandated results, both those included in the application and identified on-site, as appropriate depending on the organization’s key factors.</p> <p>On-site, examiners may ask to review a complete set of measures, followed by an interview with the quality staff to verify and clarify the meaning of the results. Any major concerns uncovered by the site visit team should be discussed on-site by the team leader and NIST monitor with the highest-ranking officer (HRO) and noted on the HRO Interview Form.</p> <p>CMS has shifted to a prospective pay-for-performance reimbursement model called Value-Based Purchasing (VBP) that</p>

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	<p>financially incentivizes/penalizes hospitals based on their performance on specific measures for their Medicare population. Examiners should review these core measures (eight measures from the 4 bundles) that account for 10% of an organization’s total performance score, efficiency measures (one measure of Medicare spending per beneficiary) that is 25% of the total score, and outcomes results (seven measures: central line infections; urinary catheter infections; mortality in pneumonia, heart failure and AMI; AHRQ PSI-90 complications, and surgical site infections) that constitutes 40% of the total score. These results will be provided by the applicant with the Updated Results, in order to determine if the applicant’s results are at or above the achievement threshold (50<sup>th</sup> percentile) or meeting/exceeding benchmark performance (90<sup>th</sup> percentile). For FY 16, these measures account for 75% of the organization’s overall VBP performance and are typically reported in 7.1. The remaining 25% of the organization’s VBP performance score is HCAHPS patient experience scores. These include 8 aggregated measures of patients’ experience of care. These measures are reported in 7.2. Achievement threshold and benchmark comparisons are based on a national baseline reporting period. Note: Organizations must have at least 10 cases for at least four core measures and at least 10 cases for 2 of the three outcomes measures to be rated under the VBP process during the reporting period. In addition, certain types of hospitals are exempt from VBP including pediatric, rehabilitation, cancer, and psychiatric hospitals as well as long term care facilities.</p>
<b>Process and Outcome Results for 7.1a Patient-Focused Health Care Results</b>	<p>Process results refer to percentage compliance with clinical therapies, guidelines, standards of care, and practice parameters related to patient care.</p> <p>Outcome results refer to the patient’s health status and might include complications, mortality, readmissions, or functional status data.</p>
<b>Process Results Related to Patient Perspectives on Care Reported in 7.2 Customer-Focused Outcomes</b>	<p>CMS also requires Hospital Consumer Assessment of Healthcare Providers and Systems (HCAHPS; pronounced “<i>h caps</i>”) results for measures of the patient’s perspective on hospital care. HCAHPS survey results relate to 18 core questions about critical aspects of Medicare patients’ hospital experiences (communication with nurses and doctors, the responsiveness of hospital staff, the cleanliness and quietness of the hospital environment, pain management, communication about medicines, discharge information, overall rating of hospital, and would they recommend the hospital). These core questions are aggregated into the 8 Domain HCAHPS measures. Portions of a hospital’s reimbursement are at risk for poor performance.</p> <p>Site visited applicants will provide the last two year’s reports for all VBP measures from CMS along with their Updated Results prior to the site visit. On-site, examiners will receive current results for these measures, as well. The team should look at all of this data to determine data trends, whether the applicant’s results are at or above the achievement threshold</p>

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	(50 <sup>th</sup> percentile) or meeting/exceeding benchmark performance (90 <sup>th</sup> percentile), and what the applicant is doing to close any gaps in its results.
<b>Information Management</b>	<p>Many organizations are now moving to electronic health records (EHR) to improve patient safety and the effective sharing of patient information across multiple sites and providers. As part of the federal Meaningful Use (MU) incentive program, hospitals are receiving financial incentives to implement EHR systems. EHR systems do vary widely across the country. Examiners will need to understand how the applicant designs and implements its systems to share patient information, including the breadth of sharing of information as well as protection of patient’s health information privacy. Many systems have implemented a “Patient Portal” where patients can electronically review their health care data.</p> <p>On-site, the team should ask for a demonstration of how the data systems work together, including how electronic information is shared between hospitals, physician clinics and post-acute care settings. In health care organizations that do not have integrated systems, the site visit team may see data produced in different ways. The team should also ask the applicant about whether the organization is receiving financial incentives under MU for its EHR.</p>
<b>Magnet Hospitals</b>	Magnet status is recognition of an organization’s efforts to promote nursing excellence, the satisfaction of nurses, and the sharing of best practices. The recognition, given by the American Nurses Credentialing Center (subsidiary of the American Nurses Association), is certainly a strength but does not mean that the hospital gives good care across the board. Magnet status refers only to nurses and not to other staff.
<b>Delivery System and Payment Models</b>	<p>Providers and payers have introduced various delivery system and payment models in efforts to improve quality and coordination across a patient’s continuum of care, reduce costs, and in some models, improve population health. One example is accountable care organizations (ACOs) in which health care organizations come together voluntarily to care for a designated population of Medicare patients and share savings and losses. Other examples include risk arrangements between providers and payers in which payments depend on the achievement of specific measurement targets, bundled payments in which providers are paid for an entire episode of care rather than fragmented portions, and patient-centered medical homes in which all care is coordinated through a primary care provider. A single entity such as a hospital or physician practice organization may participate in more than one of these models simultaneously.</p> <p>On-site, the team should make sure they have a clear understanding of all the key stakeholders, the reporting relationships among these various stakeholders, and the roles each of these providers play in achieving the mission of the applicant.</p>