QAPI: CMS Requirement of Participation

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August 10, 2017
Questions to Run On . . .

*Refresh my memory . . .

1. What is QAPI again?
2. Why do we care?
3. Have you started?
4. What do we do next?

*CMS NH QAPI Video:
https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/QAPI/NHQAPI.html
F520 (OBRA 1987) – QAA

- **Purpose:** To provide a framework for facility to evaluate their systems in order to prevent deviation in and correct inappropriate care processes
- **Focus:** Meeting the minimum requirements

Section 6102(c) of Affordable Care Act (2010)

- **Purpose:** Strengthen a facility’s capacity for data collection and analysis, strategy development, and action plans
- **Focus:** Proactive effort to improve performance
§483.75 Quality assurance and performance improvement

[§483.75 and all subparts will be implemented beginning November 28, 2019 (Phase 3), unless otherwise specified]

§483.75(a) Quality assurance and performance improvement (QAPI) program

Each LTC facility, including a facility that is part of a multiunit chain, must develop, implement, and maintain an effective, comprehensive, data-driven QAPI program that focuses on indicators of the outcomes of care and quality of life
Quality Assurance/Performance Improvement (QAPI)

“Transforming the lives of nursing home residents through continuous attention to quality of care and quality of life”
(2) Present its QAPI plan to the State Survey Agency no later than 1 year after the promulgation of this regulation; [§483.75(a)(2) will be implemented beginning November 28, 2017 (Phase 2)]
Let’s fill in the blanks:

- QAPI Plan for ____your facility____
- Vision
- Mission
- Guiding values or principles
- Purpose of your organization’s QAPI Plan
Opportunity

The Good Samaritan Foundation strives to discover gift dollars to assist in the development of varied service offerings and innovative approaches of the Society. We want to give friends of the Society and donors the opportunity to support the well-being of those the Society serves, wherever they may call home.

Outcome

The Good Samaritan Foundation shares the Society’s vision “to create an environment where people are loved, valued and at peace” by inviting donors to help show what senior care can be.

Our mission in action

The Foundation's initiatives focus on transforming the aging experience in America and connecting more seniors with local services.
Mission

Rosewood on Broadway, inspired by the Sisters of Mary of the Presentation, serves those in our care with respect and compassion as we strive to fulfill the healing mission of Jesus.
Guiding Principles

- How QAPI is interwoven into how your facility functions
- What values & principles drive all your efforts
- Confirm that all items noted in guidance and regulation repeatedly are included in your document HERE! (We’ll come back to this)
Purpose

Purpose of your organization’s QAPI plan:

_______________________________________

_______________________________________

_______________________________________

(reference aspects of your mission statement)
Program Design and Scope

- List of services you provide to residents:
  - Address all systems of care and management practices
  - Include clinical care, quality of life, and resident choice
  - Utilize best available evidence to define and measure indicators of quality and facility goals
  - Reflect the complexities, unique care, and services that you provide
Check the BOXES

- List the services that you provide to residents:

  - Post-acute care
  - Long term care
  - Dementia care and services
  - Dietary/dining
  - Housekeeping
  - Rehabilitation services

  - Transitional care
  - Therapy
  - Maintenance and engineering
  - Administration
  - Hospice
  - Palliative care
How do those services align with QAPI?

- Consider how each service area addresses:
  - Clinical care
  - Individualized goals and approaches for care
  - Quality of life
  - Resident choice
  - Safety
  - Regulations
Governance and Leadership

Leadership actively engaged with setting expectations and priorities, including:

- Systematic approach to gather input from staff, residents, families and stakeholders
- Adequate resources—time, money, others
- Ongoing and consistent staff training
- Accountability for process and results
- Balance culture of safety and rights
- Non-punitive culture
Governance and Leadership (cont.)

- Responsibility and accountability through the QAPI Steering Team
  - Executive leadership
  - Medical oversight
  - QA/QAA/QAPI Coordinator
  - Interdisciplinary
  - Include front-line staff
Governance and Leadership (cont.)

- QAPI needs to be adequately resourced
- Mandatory QAPI staff training and orientation
- Framework for QAPI
- Reporting QAPI activities
- Fair and just culture
Feedback, Data Systems and Monitoring

Systems to monitor a wide range of care and service drawing from multiple sources:

- Data from staff, residents, stakeholders and others
- Use of goals and benchmarks
- Ability to analyze, interpret and translate data into meaningful and actionable information
- Using data to systematically prioritize and select performance improvement projects (PIPs) appropriate for the nursing home
Feedback, Data Systems, and Monitoring

### 12. Identify Data Sources to Analyze Performance, Identify Areas of Risk and Solicit Feedback/Input

Organizations must effectively identify, collect, and use data and information from all departments and the facility assessment. Identify data sources, the frequency of data collection/analysis, targets/benchmarks you will use and establish a plan to communicate data analysis. Choose data sources your organization will use to develop and monitor performance indicators that will track your ongoing performance.

<table>
<thead>
<tr>
<th>Data Sources</th>
<th>Data collection frequency</th>
<th>Benchmarks to analyze this data source</th>
<th>Who will analyze the data?</th>
<th>Data analysis frequency</th>
<th>Data will be communicated with</th>
<th>Communicate data analysis via</th>
<th>Frequency of communication</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suggestions</td>
<td>weekly</td>
<td>applicable clinical guidelines</td>
<td>HR</td>
<td>weekly</td>
<td>board members</td>
<td>board meetings</td>
<td>weekly</td>
</tr>
<tr>
<td></td>
<td>monthly</td>
<td>identified best practices</td>
<td>Leadership Team</td>
<td>monthly</td>
<td>caregivers</td>
<td>bulletin boards</td>
<td>monthly</td>
</tr>
<tr>
<td></td>
<td>quarterly</td>
<td>national data</td>
<td>QAA committee</td>
<td>quarterly</td>
<td>community</td>
<td>dashboards</td>
<td>quarterly</td>
</tr>
<tr>
<td></td>
<td>annually</td>
<td>organizational (chain) data</td>
<td>annually</td>
<td>annually</td>
<td>executive leadership</td>
<td>newsletters</td>
<td>annually</td>
</tr>
<tr>
<td></td>
<td></td>
<td>state data</td>
<td></td>
<td></td>
<td>families</td>
<td>posters</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>residents</td>
<td>interdisciplinary meetings</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>volunteers</td>
<td>staff meetings</td>
<td></td>
</tr>
</tbody>
</table>


Data Sources

- Abuse, neglect, maltreatment reports
- CMS QMs/MDS
- Human resources
- Case mix
- Trend tracker
- Survey deficiencies
- Complaints

- Falls
- Med errors
- Admissions, discharges, transfers
- Resident/Family Council minutes
- Satisfaction surveys
- Suggestions boxes
Performance Improvement Projects

Conduct Performance Improvement Projects (PIPs) to improve care or services in areas relevant for your residents:

- Gather information systematically to clarify issues and identify opportunities
- Test and implement changes
- Data

![PDCA Cycle Diagram]

Plan
Act
Study
Do
Performance Improvement Projects

- Identifying topics
- Prioritizing and selecting PIPs
- PIP charters
- PIP teams
- Documentation and communication

PIPs: Identifying Topics

- Aspects of care occurring most frequently or affecting large numbers of residents
- Diagnoses associated with high rates of morbidity or disability if not treated in accordance with accepted standards of care (Evidence-based research/practices)
- Issues identified from demographic and epidemiological data
- Access to care post-discharge
- Resident/family expectations
- Regulatory requirements
- Availability of data
- Ability to impact the problem and available resources
- Critical incidents
- Near misses
- Safety concerns
- Survey deficiencies scope and severity
# PIPs: Prioritizing

## Prioritization Worksheet for Performance Improvement Projects

**Directions:** This tool will assist in choosing which potential areas for improvement are the highest priority based on the needs of the residents and the organization. Follow this systematic assessment process below to identify potential areas for PIPs. This process will consider such factors as high-risk, high-volume, or problem-prone areas that affect health outcomes and quality of care. This tool is intended to be completed and used by the QAPI team that determines which areas to select for PIPs. Begin by listing potential areas for improvement in the left-hand column. Then score each area in the following columns based on a rating system of 1 to 5 as defined below:

<table>
<thead>
<tr>
<th>Rating</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>very low</td>
</tr>
<tr>
<td>2</td>
<td>low</td>
</tr>
<tr>
<td>3</td>
<td>medium</td>
</tr>
<tr>
<td>4</td>
<td>high</td>
</tr>
<tr>
<td>5</td>
<td>very high</td>
</tr>
</tbody>
</table>

Rating is subjective and is meant to be a guide and to stimulate discussion. Finally, add the scores across the row and tally in the final column. Potential improvement areas with a higher score indicate a higher priority.

<table>
<thead>
<tr>
<th>Potential Areas for Improvement</th>
<th>Prevalence</th>
<th>Risk</th>
<th>Cost</th>
<th>Relevance</th>
<th>Responsiveness</th>
<th>Feasibility</th>
<th>Continuity</th>
<th>Total Score Tally</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consider areas identified through: Dashboard(s) Feedback from staff, families, residents, other incidents, near misses, unsafe conditions Survey deficiencies</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PIPs: Chartering**

**PROJECT APPROACH**

**Recommended Project Time Table:**

<table>
<thead>
<tr>
<th>PROJECT PHASE</th>
<th>START DATE</th>
<th>END DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initiation: Project charter developed and approved</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Planning: Specific tasks and processes to achieve goals defined</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementation: Project carried out</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Monitoring: Project progress observed and results documented</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Closing: Project brought to a close and summary report written</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Project Team and Responsibilities:**

<table>
<thead>
<tr>
<th>TITLE</th>
<th>ROLE</th>
<th>PERSON ASSIGNED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Sponsor</td>
<td>Provide overall direction and oversee financing for the project</td>
<td></td>
</tr>
<tr>
<td>Project Director</td>
<td>Coordinate, organize and direct all activities of the project team</td>
<td></td>
</tr>
<tr>
<td>Project Manager</td>
<td>Manage day-to-day project operations, including collecting and displaying data from the project</td>
<td></td>
</tr>
<tr>
<td>Team members*</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Choice of team members will likely be deferred to the project manager based on interest, involvement in the process, and availability.

**Material Resources Required for the Project** (e.g., equipment, software, supplies):

[Link](https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/QAPI/downloads/PIPCharterWkshtdebedits.pdf)
# Sample PIP Templates

## QAPI Performance Improvement Project (PIP)

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mission Statement</strong></td>
<td></td>
</tr>
<tr>
<td>• Lead</td>
<td>•</td>
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<td>•</td>
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<td>•</td>
<td>•</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Team Members</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Focus Area</strong></td>
<td></td>
</tr>
</tbody>
</table>

### Describe Problem

### Goal Desired Outcome
- Specific
- Measureable
- Attainable
- Relevant
- Time-Bound

## Outcome Measurement

<table>
<thead>
<tr>
<th>Report Period</th>
<th>Baseline - Starting Point</th>
<th>Target/Goal</th>
<th>Reevaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Numerator</strong></td>
<td><strong>Denominator</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rate (%)</td>
<td></td>
<td>Facility Observed Percent</td>
<td></td>
</tr>
<tr>
<td>National Percentile</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Sample PIP Templates (cont.)

<table>
<thead>
<tr>
<th>PERFORMANCE IMPROVEMENT PROJECT (PIP) GUIDE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>START DATE</strong></td>
</tr>
<tr>
<td><img src="image1.png" alt="Image" /></td>
</tr>
<tr>
<td>PROJECT LEADER:</td>
</tr>
<tr>
<td>KEY AREA FOR IMPROVEMENT:</td>
</tr>
<tr>
<td>GOAL:</td>
</tr>
<tr>
<td>Specific</td>
</tr>
<tr>
<td>Measureable</td>
</tr>
<tr>
<td>Action Oriented</td>
</tr>
<tr>
<td>Realistic</td>
</tr>
<tr>
<td>Time Bound</td>
</tr>
</tbody>
</table>

**WHAT IS THE ROOT CAUSE(S) FOR THE PROBLEM?** Ask “Why is this happening?” 5 times. If you removed this root cause, would the event have been prevented?

**BARRIERS:**

**BRAINSTORM POSSIBLE SOLUTIONS and START YOUR PDSA CYCLE (PLAN, DO, STUDY, ACT) – See page 2**
Create real impact and long-lasting improvement as the result of QAPI through:

- Taking into consideration all aspects of the organization when making changes
- Addressing errors at the systems level rather than looking at an individual to blame
- Linking outcomes of QAPI efforts to policies and procedures; staff orientation and ongoing education; performance expectations; and strategic planning
Systematic Analysis/Evaluation

- QAPI Self-Assessment every _____ months
- Resident Satisfaction
- Family Satisfaction
- Staff Satisfaction
Systematic Analysis and Systemic Action

- Root Cause Analysis
  - Five Whys
  - Flowcharting
  - Fishbone diagram
  - Failure Mode and Effects Analysis (FMEA)
  - Other
RCA: Five Whys

How to Develop a Flowchart

Flowcharts are developed using shapes to diagram the types and flow of steps, activities, or events in a process. Use these shapes to represent different types of steps or actions in the process. Using large poster sheets with sticky notes for process steps or writing on a whiteboard can help.

- The beginning and end of a process
- A task or activity in the process
- A decision point, for example yes or no

Direction or flow of the process

RCA: Fishbone diagram

https://www.stratishealth.org/documents/rca-toolkit/4.3-Fishbone-diagram-worksheet.pdf
## RCA: FMEA

<table>
<thead>
<tr>
<th>Steps in the Process</th>
<th>Failure Mode</th>
<th>Failure Causes</th>
<th>Likelihood of Occurrence (1-10)</th>
<th>Likelihood of Detection (1-10)</th>
<th>Severity (1-10)</th>
<th>Risk Profile Number (RPN)</th>
<th>Actions to Reduce Occurrence of Failure</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
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<tr>
<td>3</td>
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</tbody>
</table>

http://www.ihi.org/resources/Pages/Tools/FailureModesandEffectsAnalysisTool.aspx
Communication

- To whom?
- How often?
Re-check Guiding Principles

- Organized problem-solving approach
- Non-punitive/Just Culture
- All staff/all departments involved
  - “The way we do our work”
  - Input from staff, residents, families
  - Leaders model expected behaviors
  - Data driven
    - “What gets measured... gets done”
Facility Assessment

- Nursing Home Facility Assessment Tool and State Operations Manual Revisions Call
- September 7, 2017
- 12:30 p.m.-2 p.m. CT/11:30 a.m.-1 p.m. MT
- [MLN Registration Page](#)
Need help? Contact us any time!

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This material was prepared by the Great Plains Quality Innovation Network, the Medicare Quality Improvement Organization for Kansas, Nebraska, North Dakota and South Dakota, under contract with the Centers for Medicare & Medicaid Services (CMS), an agency of the U.S. Department of Health and Human Services. The contents presented do not necessarily reflect CMS policy. 1150W-GPQIN-ND-C2-92/0817