Risk Management Plans

The Office of Residential Care Facilities

U.S. Department of Housing and Urban Development

Eastern Lenders Conference
Philadelphia, PA
March 13 & 14, 2013

FHA
HEALTHCARE PROGRAMS

Risk Management Requirement

- ## New Operator Regulatory Agreement

  In accordance with Program Obligations, Operator shall implement and maintain a risk management program which incorporates a real-time incident reporting and tracking system that informs Operator's senior management of all incidents with the potential to expose the Operator to liability for personal injury or other damages. Each incident must be reviewed by Operator's appropriately-trained professional staff, and such staff must follow-up on incidents as necessary. The risk management program must include appropriate training for Operator's staff.

FHA
HEALTHCARE PROGRAMS

Risk Management Requirement

RATIONALE

- Assurance that the management team is taking steps to control risk every day

- Experienced professionals administering risk management program

Risk Management Requirement

- December 19, 2012 Email Blast

  ❖Develop and document a comprehensive software-based risk management program and have designated staff positions to implement the risk management program

    Highly experienced long-term care risk manager develops the company's risk management program, tracks incidents, analyzes incident trends, trains/re-trains front line staff as needed, works with the professional liability insurance carrier, etc.

FHA
HEALTHCARE PROGRAMS

Risk Management Requirement

- ## December 19, 2012 Email Blast

  - ❖ Contract with a third party provider of electronic risk management

    The statement of work must include, at a minimum, the following:

    - Access and use of an electronic incident tracking and reporting system
    - Facility incident reporting and tracking with the third party provider's data processing/risk management center
    - Clinical specialists to review all incidents and trends and train staff accordingly
    - Assist the facility in developing, implementing and maintaining appropriate risk prevention initiatives

    Third party provider must have years experience and client list

6

FHA
HEALTHCARE PROGRAMS

Risk Management Requirement

- Reviewed and approved by HUD prior to closing

- Maintain for the life of the loan

- Future requests for changes must be reviewed and approved by HUD Asset Management

Risk Management Expert Panel

Objectives

- Review definition of QAPI
- New expectations of QAPI
- Discuss the Five Elements
- Review the importance of collecting valid data to identify and monitor an effective Performance Improvement Project (PIP)
- Identify resources outlining a QAPI program

What is QAPI?

- Quality Assurance and Performance Improvement (QAPI) is a data-driven and pro-active approach to quality improvement.
- Collaborative commitment from all departments within a facility to continuously identify opportunities for improvement in the quality of care through a systemic approach

FHA
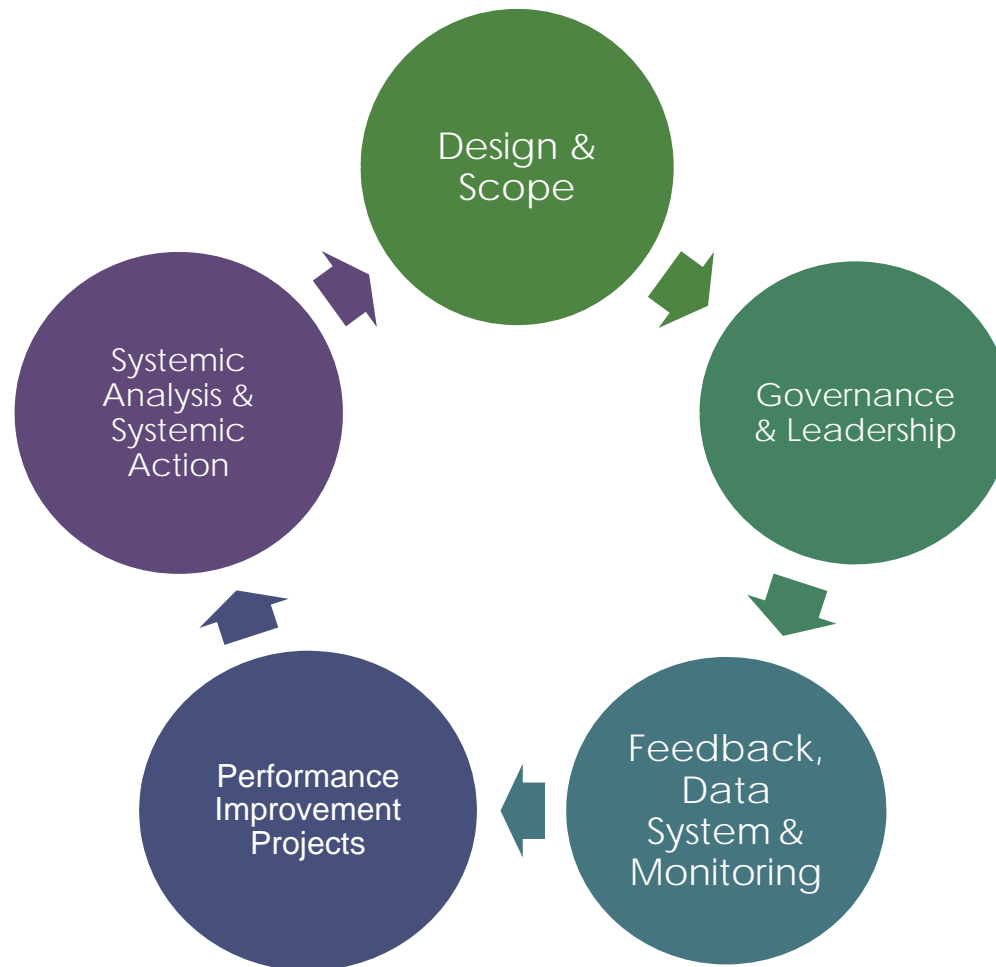HEALTHCARE PROGRAMS

What is expected from QAPI?
Quality Assurance and Performance Improvement

The wheels are in motion for nursing homes to develop an effective Quality Assurance Performance Improvement (QAPI) program. Although Quality Assurance is not a new concept in long term care, there are some new components that nursing homes must include in their individualized QAPI program that can seem to be overwhelming.

- Owner/Board & executive leadership is expected to be committed to provide resources specifically dedicated to QAPI which includes training
- On-going, comprehensive program

FHA
HEALTHCARE PROGRAMS

Five Elements of QAPI

Design & Scope

Governance & Leadership

Feedback, Data System & Monitoring

Performance Improvement Projects

Systemic Analysis & Systemic Action

FHA
HEALTHCARE PROGRAMS

Design & Scope

- A QAPI program must be ongoing and comprehensive
- Inclusive of all departments & functions
- Plan must address quality of care, quality of life, safety, and care transitions.
- Emphasizes & respects resident autonomy and choice in daily life activities

FHA
HEALTHCARE PROGRAMS

Element 1:
Design & Scope Requirements

- Must be ongoing and comprehensive
- Include the full range of services offered by the facility and departments.
- Program should address clinical care, quality of life, resident choice, and care transitions.
- Utilize the best available evidence to define and measure goals.

Source: CMS

14

Element 2:
Governance & Leadership Expectations

- QAPI program must be spear-headed by the owners/board & executive leadership
- Work in tangent with facility staff and residents and/or their families
- Provide sufficient resources to conduct program, which includes designating one or more persons to be accountable for QAPI; developing leadership and facility-wide training on QAPI; and ensuring staff time, equipment, and technical training as needed for QAPI.
- Establish policies to sustain the QAPI program despite changes in personnel and turnover.
- Set priorities for the QAPI program and build on the principles identified in the design and scope.
- Set expectations around safety, quality, rights, choice, and respect.
- Support an atmosphere in which staff are not punished for errors and do not fear retaliation for reporting quality concerns while maintaining accountability

Source: CMS

FHA
HEALTHCARE PROGRAMS

Element 3:
Feedback, Data Systems, & Monitoring

- Feedback systems must monitor care & services from multiple sources including input from staff, residents, families, and others as appropriate.
- Utilize performance indicators to monitor a wide range of care processes and outcomes, and review findings against benchmarks and/or targets
- Track, investigate, and monitor all Adverse Events that occur, and develop action plans to prevent recurrences

Source: CMS

16

Element 4:
Performance Improvement Projects

- Conduct Performance Improvement Projects (PIPs) to examine and improve care or services in areas that are identified as needing attention.
- Performance Improvement Projects (PIPs) are high risk, high volume, problem-prone areas – not necessarily clinical

Source: CMS

Element 5:
Systematic Analysis and Systemic Action

- Systematic approach to determine when in-depth analysis is needed to fully understand the problem, its causes, and implications of a change.
- Systemic Action in order to look comprehensively across all involved systems to prevent future events and promote sustained improvement.
- Focus is on continual learning and continuous improvement

Source: CMS

Conclusion

- Federal Government invested in improving quality of patient care and cost saving with the LTC environment

- Potential to fundamentally improve and enrich the current type of quality reporting

- In conjunction with the QAPI process, Electronic Incident Reporting improves patient care and reduces Medicare/Medicaid costs

23