



## Top Deficiencies and Survey Findings

AAAASF Experience in RHC Deeming Since 2013

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## Most Commonly Cited Deficiencies

Citations	Standard	CMS CFR	Standard Text	Common Findings
63	1000.010.020	491.10(a)(3)(i)	The clinic maintains a record for each patient receiving health care services, identification and social data, evidence of consent forms, pertinent medical history, assessment of the health status and health care needs of the patient, and a brief summary of the episode, disposition, and instructions to the patient.	Lack of: <ul style="list-style-type: none"> <li>• Consent</li> <li>• Advance Directives</li> <li>• Response to Allergies</li> <li>• Bleeding Tendency</li> <li>• Medical History</li> </ul>
55	600.010.020	491.6(b)(2)	The clinic keeps the drugs and biologicals appropriately stored.	<ul style="list-style-type: none"> <li>• No date or initials when opened</li> <li>• Unlocked (w/Keys)</li> <li>• Expired</li> <li>• Refrigerator unchecked</li> </ul>
50	900.010.115	491.9(c)(3)	The clinic provides medical emergency procedures as a first response to common life threatening injuries and acute illness and has available the drugs and biological commonly used in life saving procedures, such as analgesics, anesthetics (local), antibiotics, anticonvulsants, antidotes and emetics, serums and toxoids.	<ul style="list-style-type: none"> <li>• EMS Agreement</li> <li>• Office Next Door</li> <li>• Recent Clarification</li> <li>• Not an exhaustive list</li> </ul>



## Most Commonly Cited Deficiencies cont.

Citations	Standard	CMS CFR	Standard Text	Common Findings
42	600.010.015	491.6(b)(1)	The clinic has a preventive maintenance program to ensure that all essential mechanical, electric and patient-care equipment is maintained in safe operating condition.	<ul style="list-style-type: none"> <li>• May prioritize but the Schedule Must be Clear</li> <li>• Equipment from Storage must be checked</li> <li>• General Approvals (ie. "Room 1 OK")</li> </ul>
31	600.010.005	491.6(a)	The clinic is constructed, arranged, and maintained to insure access to and safety of patients, and provides adequate space for the provision of direct services.	<ul style="list-style-type: none"> <li>• Open/unlocked storage of cleaning and other hazardous agents</li> <li>• Trip Hazards</li> <li>• Sharps</li> <li>• Electrical outlet/plug covers</li> </ul>
28	900.010.060	491.9(b)(3)(iii)	The clinic's policies include rules for the storage, handling, and administration of drugs and biologicals.	<ul style="list-style-type: none"> <li>• Using Hospital Policy</li> <li>• Improper Disposal</li> <li>• Improper Labeling</li> <li>• Expired</li> </ul>



## Most Commonly Cited Deficiencies cont.

Citations	Standard	CMS CFR	Standard Text	Common Findings
26	900.010.090	491.9(c)(2)(ii)	The clinic provides basic laboratory services which implements the provision of section 353 of the Public Health Service Act wherein the RHC provides basic laboratory services essential to the immediate diagnosis and treatment of the patient, including Hemoglobin or hematocrit.	<ul style="list-style-type: none"> <li>Lack of Quality Control Logs</li> </ul>
21	900.010.035	491.9(b)(2)	The clinic's policies are developed with the advice of a group of professional personnel that includes one or more physicians and one or more physician assistants or nurse practitioners, and at least one member that is not a member of the clinic staff.	<ul style="list-style-type: none"> <li>Non-clinic member</li> <li>NP/PA Involvement</li> <li>Timely Review (documented)</li> <li>Policy setting after accreditation</li> </ul>
19	1100.010.040	491.11(c)(2)	The clinic conducts an evaluation to determine whether the established policies were followed.	<ul style="list-style-type: none"> <li>OK for new clinics not to have a program evaluation; but must have a plan</li> </ul>
19	1100.010.020	491.11(b)(2)	The clinic conducts an evaluation, including a representative sample of both active and closed clinical records.	<ul style="list-style-type: none"> <li>Minutes do not Reflect Evaluation</li> <li>No Specification or Open/Closed</li> </ul>



## Procedural Reminder

- Any changes to your clinic's record must be managed with the Fiscal Intermediary (FI)/ Medicare Administrative Contractor (MAC) and AAAASF
  - Please start the process by notifying AAAASF and filing an amendment to your 855 with the FI/MAC
  - AAAASF cannot change our records until we receive notice of approval
  - Common circumstances: Clinics Moves, Address Changes (such as a new street name), Ownership or Name Changes