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Mock Survey: An Important Component of Survey Preparation and Deficiency Avoidance

Many facilities strive to be ‘survey-ready’ all year round. But just like many of us schedule the big spring cleaning some time in advance of the in-laws arriving for their annual summer visit, some facilities opt to conduct a Mock Survey in anticipation of their annual licensure/certification visit.

Mock Surveys can serve several purposes:

- A Mock Survey can be an opportunity to take a fresh look at systems, procedures and processes of care, and identify potential survey-*risk* areas. As numerous articles in *Weeks News* have discussed, survey-risk can quickly translate into litigation-risk.
- A Mock Survey also can reveal how staff will function under stressful circumstances.

Taking that fresh and objective look is essential in order to reap the maximum benefit from the Mock Survey process. Facilities across the State are discovering the hard way that the procedures, protocols and monitoring/QA systems that served them well enough in the past are no longer sufficient to avoid survey deficiencies. ‘But we’ve always done it this way; the surveyors never cited us on this in the past; we thought we were doing this correctly; we’ve always done well on our surveys before – how could this be happening?’ It is hard to stay current with new standards and the more stringent application of existing standards, i.e. F314 Pressure Ulcers, F315 Continence/Catheters, F323 Accidents, etc. It is hard to look at one’s own organization and see its shortcomings.

One way to get a fresh and objective perspective and to minimize survey-risk is to have the Mock Survey process conducted by someone external to the facility. This ‘someone’ could be a consultant or an experienced and well informed professional from a neighboring facility. If, however, the facility elects to manage the process using its own personnel, incorporating the following approaches can facilitate objectivity:

- Assign department heads to ‘survey’ departments other than their own. In nursing, have charge nurses/unit managers, supervisors, etc., assigned to audit other units and/ or aspects of care for which they are not usually responsible. *It is often hard to see your own forest for the trees.*

- Although obviously the internal ‘surveyors’ will know that a Mock Survey will be taking place at some point, it could be more beneficial if direct care staff and other workers were not informed. *Maximizes the surprise and stress factor.*
- Even though the internal ‘surveyors’ know that the process is planned, the Mock Survey should be unannounced. The Administrator walks in one morning and proclaims it to be Mock Survey Day. *Simulates ‘real life’ conditions; surveyors always show up at the worst possible time.*

The most important part of the Mock Survey process is what you do after its over. If the facility has about three months between the Mock Survey and the earliest likely date of the next survey, then I recommend the ‘Systems’ approach. The Systems approach includes a broader review and analysis of facility policies, procedures, protocols and practices that may be contributing to Quality Indicator Report flags and/or to the ‘findings’ of the Mock Survey ‘survey team.’ If the facility has one month or less between the Mock Survey and the earliest likely date of the next survey, then I recommend you go into ‘Manage the Damage Mode.’ What are your high-risk areas, which residents have experienced negative outcomes, how can the risk be lessened and/or the negative outcome be explained and/or otherwise addressed?

In either scenario, Systems or Manage the Damage Mode, develop a Corrective Action Roadmap that assigns responsibility, targets timeframes and breaks down the plan into operational steps.

Pre-survey preparation and risk management are the two most effective tools we have to weather today’s regulatory climate. Most facilities, if they haven’t endured it already themselves, know of a facility in their area- good reputation, well respected in their community, satisfactory survey history – that has been blown out of the water during their last survey. Wouldn’t facilities rather have a ‘friendly outsider’ or their own staff discover the dust-bunnies *before* the surveyors do? Can they afford not to?

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