



#### Welcome

Achieving ACHC Pharmacy Accreditation







Greg Stowell
Associate Director, Education & Training



# **ACHCU**

#### TOOLS

Workbooks Readiness Policy & Procedure Manuals Performance Improvement (PI) Audit Tools

#### **EDUCATION**

Workshops Webinars Training HealthTrainU

#### Education

Gap Analysis Compliance Audits Pre-Survey Prep

Customer Centered



#### Three Groups Represented

- Pharmacy's needing both Specialty and DMEPOS Accreditation (billing Medicare Part B)
  - Specialty Pharmacy Accreditation (SRX)
- Pharmacy's needing Specialty Accreditation (with no Medicare Part B DMEPOS billing)
  - Specialty Pharmacy Only (SRXONLY)
- Medically Integrated Dispensing Practices
  - Specialty Pharmacy Only (SRXONLY)
- Based on your practice needs, you will need to filter the information we present today and in the live workshop
- Not everything we discuss will apply equally to all practice settings, however regardless of your practice setting you are expected to comply with all ACHC pharmacy standards



### Learning Objectives

- Review the Application Process
- Discuss Pharmacy Standards Updates
- Understand Medicare DMEPOS requirements as they relate to pharmacy operations (as applicable)
- Become familiar with the initial and renewal accreditation process
- Learn how to prepare an organization for the accreditation survey
- Get a detailed look at the survey day and post-survey process
- Learn how to utilize the ACHC Accreditation Guide to Success to ensure ongoing compliance



#### **ACHC Accreditation Guide to Success**

- ACHC Accreditation Guide to Success for Pharmacy
- Developed to help walk you through the accreditation process
- Workbook contains all standards (IRX/SRX/SRXONLY)
- Gap analysis tools to help you assess readiness
- Surveyor hints regarding common deficiencies
- Sample forms and document templates





#### **About ACHC**

- Nationally recognized accreditation organization with more than 30 years of experience
- CMS Deeming Authority for Home Health, Hospice, Renal Dialysis, DMEPOS, Home Infusion Therapy, Clinical Laboratory, Acute Care Hospital, Critical Access Hospital and Ambulatory Surgery Center
- Recognition by major third-party payors
- Approved to perform state licensure surveys
- Quality Management System that is ISO 9001:2015 Certified



#### Experience The ACHC Difference

- Standards created for providers, by providers
- All-inclusive pricing no annual fees
- Personal Account Advisors
- Commitment to exceptional customer service
- Surveyors with industry-specific experience
- Dedicated clinical support
- Dedicated regulatory support
- Educational resources





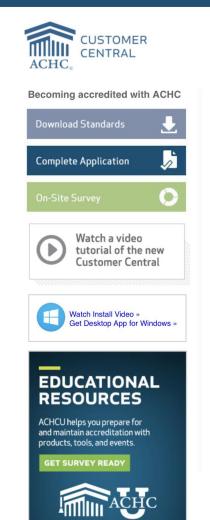


# Customer Central & Overview of the Accreditation Process









**EDUCATIONAL RESOURCES** 

Customer Central is your personalized website to complete the accreditation process, from start to finish!

Please provide the information requested below to create your account and download ACHC standards

FIRST NAME	
LASTNAME	PHONE
EMAIL	
COMPANY NAME	
DBA NAME	
ADDRESS	
CITY	STATE -
	ZIP
ACCREDITATION PROGRAM	NUMBER OF LOCATIONS
SELECT A USERNAME	
ENTER PASSWORD	CONFIRM PASSWORD
Accreditation completed by:	Which of the following best describes you?
Please Choose	Please Choose
How did you hear about ACHC?	Are you hospital-affiliated?
Please Choose	YES NO
	SUBMIT



Log in above or create a new account below.





#### **Download ACHC's Standards** Select the program and services applicable to your company and click 'Download'. If standards are not required, Application» continue to your application. Applying for reaccreditation? Download the program-specific updates under Educational Tools. Download **Durable Medical Equipment, Prosthetics, Orthotics, and Supplies Community Retail** Behavioral Health Download Home Health – Medicare Certified Download Hospice Download Download Private Duty - Non-Medicare Certified Download Download Assisted Living Facilities **Ambulatory Care** Download



#### PREPARE WITH ACCREDITATION WORKSHOPS





Pre-Survey Preparation

Thorough Review of ACHC Accreditation Standards

Key Steps to a Successful On-Site Survey

How to Complete Important Post-Survey Components





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#### Account Advisor



- Lomeka Perry Lperry@achc.org (919) 785-1214 ext. 226 Fax: (919) 785-3011
- ACHC 139 Weston Oaks Ct. Cary, NC 27513
- Video Tutorials

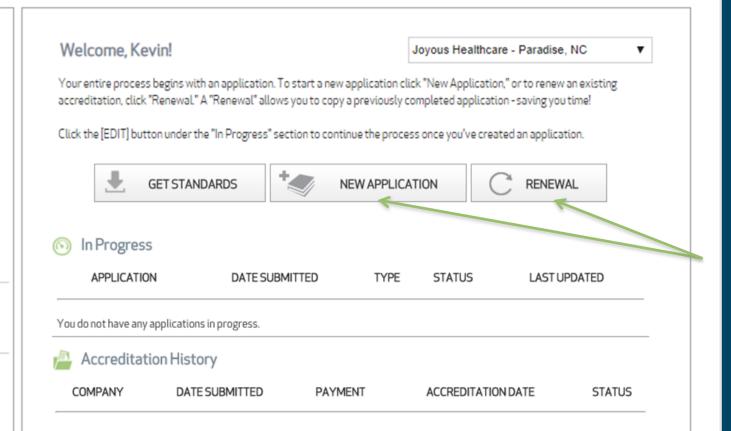
  Customer Central Tour

  Application Tour

  PER "How To"

  On-Site Survey

  POC "How To"



If this is your first time with ACHC Accreditation, click the "NEW APPLICATION" button.

If you're in an existing accredited account (as shown), you can click on the "RENEWAL" button to save time.



### Online Application

- NEW APPLICATION or RENEWAL
- Main office:
  - Profile
  - Location
  - Contacts
  - Services
- Additional locations branch locations
- Blackout dates
- Services provided



#### **PER Checklist**

#### PRELIMINARY EVIDENCE REPORT (PER) INITIAL CHECKLIST

Required items to be submitted to the Accreditation Commission for Health Care (ACHC):





have not been provided

This checklist constitutes the requirements of the PER, which is mandatory for organizations applying for initial Pharmacy accreditation.

Review and acknowledge that all of the following requirements have been met and submit this signed checklist with the required items listed below.

	☐ Accreditation application
	□ Non-refundable deposit
	☐ Organization's new client/patient information/admission packet
	<ul> <li>It is preferred that this information be provided to ACHC in digital format</li> </ul>
	☐ Organizational chart by position titles
	☐ Any current citation(s) from a federal or state agency (e.g. FDA, Board of Pharmacy, etc.)
	☐ If the pharmacy performs sterile compounding, provide the procedures that outline the process of compounding  ■ These can be in the form of policies that match the ACHC Accreditation Standards or can be the complete procedures that are followed for the compounding process
Cd	onfirmation of the following (initial in spaces provided):
_	lattest that this organization possesses all policies and procedures as required by the ACHC Accreditation

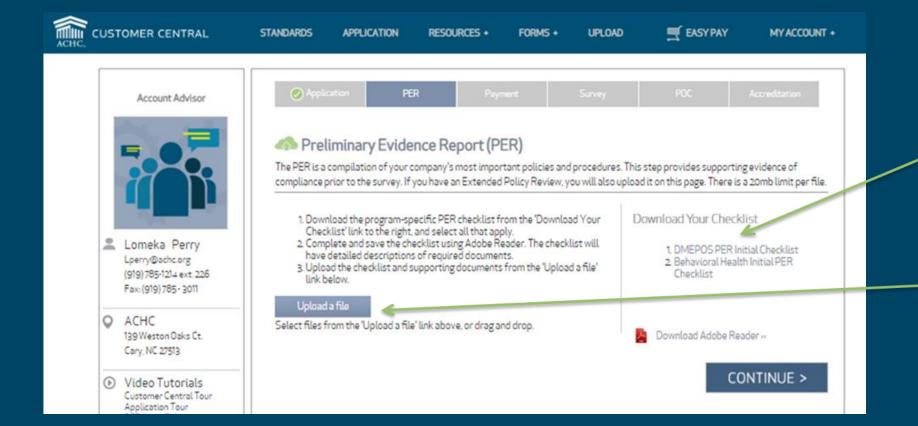
(date)	
I, having the authority to represent this organization, verify that legal name) has met the above requirements for survey. Failure to meet any of the aforementioned re ACHC Surveyor arrives on site may result in additional charges to the organization for a subsequent s when the organization has notified ACHC it has met all of the above requirements. I agree that during	urvey to be performed

I acknowledge that this organization was/is/will be in compliance with ACHC Accreditation Standards as of

Organization has 5 client/patient files, or can provide 5 mock files at the time of survey if equipment or supplies







First download the correct PER Checklist.

Completely fill out the PER Checklist and upload with supporting documents.



### **Extended Policy Review**

- Optional review of complete policies and procedures by an ACHC
   Surveyor to determine compliance prior to the on-site survey
- Feedback from an ACHC Surveyor regarding the alignment of agency's policies and procedures to ACHC Accreditation Standards
- Option to purchase through the Customer Central portal
- Customized Reference Guide for Required Documents; policies and procedures available as a download



#### DMEPOS Addendum (if applicable)

- As part of your application process, you will be asked to complete a section titled "DMEPOS Supply Categories."
- You will only need to complete an addendum if you plan on billing Medicare under the DMEPOS program.
- Medications billed under Medicare Part B are exempt from the accreditation requirement.
- As a reminder, if not billing Medicare under the Part B program select "SRXONLY" accreditation
- Only select the codes for items that each location is actually providing; you should not select codes for items you hope to provide in the future.
- Your application addendum guides ACHC to ensure we have the proper accreditation programs and tools selected for your survey, and that we send a Surveyor with the necessary expertise.



# Agreement

Accreditation Agreement
(BAA/Contract) reviewed
by customer, signed and
returned to Account
Advisor



14 Calendar Days

Payment Information			
Deposit Received: << <insert amount="" deposit="" here="">&gt;&gt;</insert>			
Discount (if applicable): << <insert amount="" discount="" here="">&gt;&gt;</insert>			
Remaining Balance: << <remaining balance="">&gt;&gt;</remaining>			
<> <first payment="">&gt;&gt;&gt; Due on line upon execution of this Agreement.</first>			
<<<SECOND PAYMENT $>>>$ Due 12 months from date of the Accreditation Decision Letter.			
<> <third payment="">&gt;&gt;&gt; Due 24 months from date of the Accreditation Decision Letter.</third>			
Payment Method:			
I wish to pay my bill online (an email with a link to online payment will be sent following the execution of this agreement)			
☐ I wish to receive a paper invoice for payment			





### So, when am I officially "in process?"

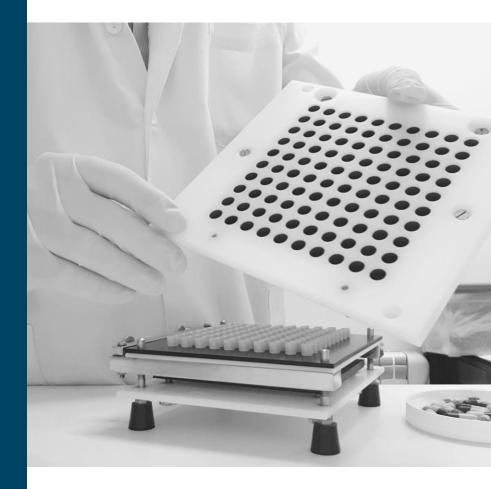
- Completed application (online)
- Deposit (online)
- Completion and return of PER (online)
- Signed and returned Accreditation Agreement
- When will your survey be conducted?
  - New application Some point after "Date of Readiness" (excluding blackouts)
  - Renewal Based on when you apply and when accreditation expires







### Customer Central Regulatory Resources





STANDARDS

APPLICATION

RESOURCES +

FORMS + UPLOAD

**■** EASY PAY

MY ACCOUNT +

#### Account Advisor

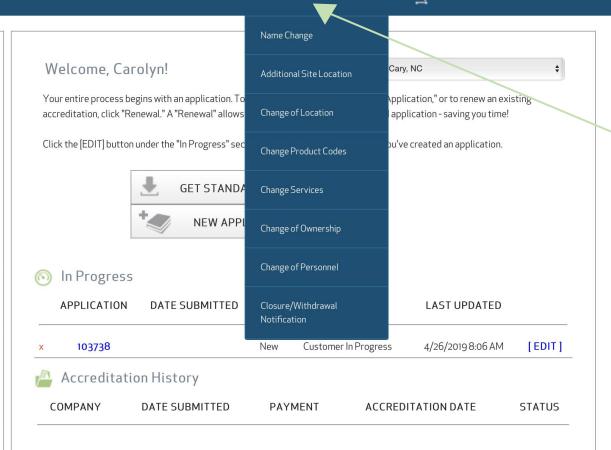


Nora Lee Stephen nstephen@achc.org (919) 785-1214 ext. 230 Fax: (919) 785 - 3011

ACHC 139 Weston Oaks Ct. Cary, NC 27513

Video Tutorials
Customer Central Tour
Application Tour
PER "How To"
On-Site Survey
POC "How To"

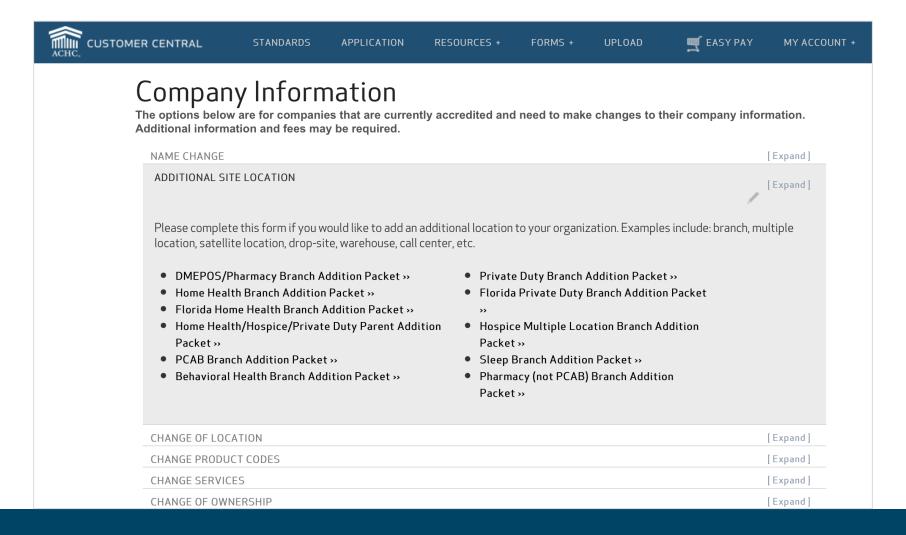




Use the FORMS tab to edit company information

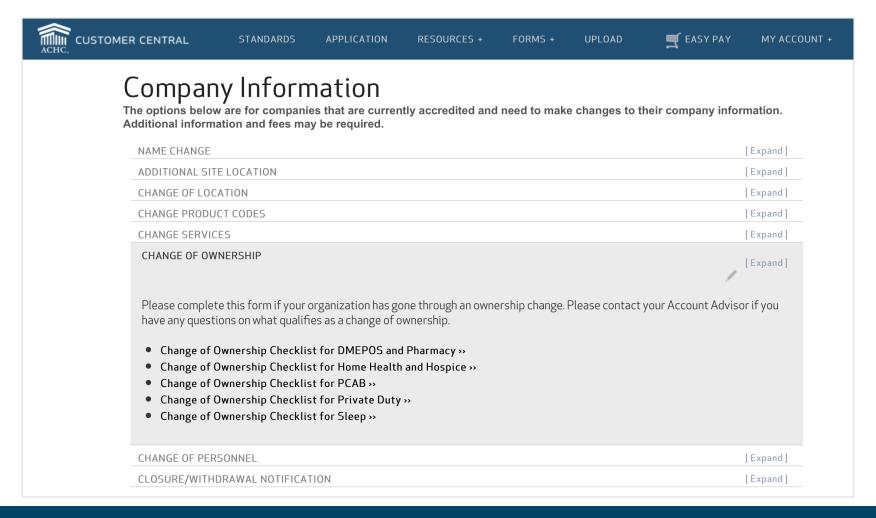


#### **Branch Addition**



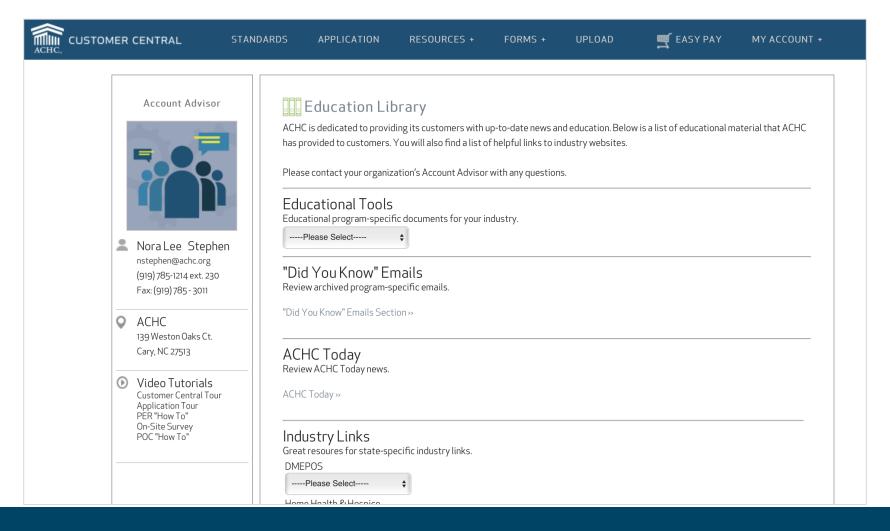


# Change of Ownership





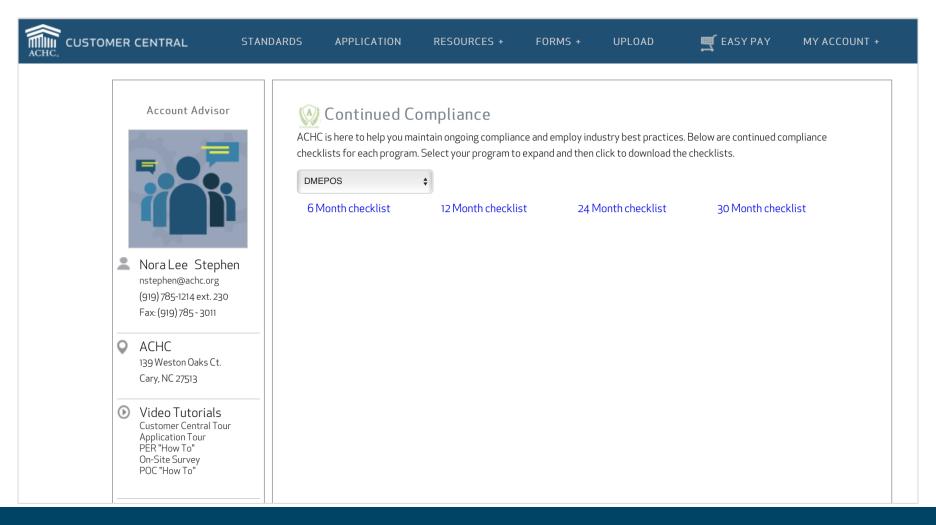
### **Education Library**







### Continued Compliance







#### **Account Advisors**

- Key resource in navigating the accreditation process.
- Experts on the process, but not Pharmacists.
- If asking a regulatory or pharmacy practice question, your Account Advisor (AA) will direct your question to the appropriate clinical or regulatory department.
- Phone calls are good, but a well-worded email can help get you the most accurate answers.
- Customer Central and your workbook answer many of the most common process questions.
- One question they cannot answer: When is my survey?



#### **ACHC Standards**

- ACHC Standards are developed and customized specifically for the services that you provide and are based on applicable regulations from CMS and other federal and state regulators.
- There are "core" standards that apply to all programs.
- Your workbooks reference all programs to which a standard applies.
- You can download Specialty Pharmacy (SRX) standards only.
- ACHC standards are NOT intended to tell you how to "run your business."



#### **ACHC Standards**

#### STANDARDS UPDATE GUIDE





PHARMACY

Listed below are standards updated in 2022 for ACHC Pharmacy Accreditation. Summaries of the changes and effective dates also are provided. Organizations must be compliant with any changes on the effective date and must maintain compliance throughout their accreditation period.

Standard	Services Applicable	Update Summary	Effective Date
DRX4-2K	MORX, SRX, SRXONLY	Removed the requirement for pre- employment drug testing for personnel with access to pharmaceuticals.	February 1, 2022
DRX7-8G	IRX	Added that verification of temperature-sensing devices to conform to National Institute of Standards & Technology (NIST) standards is required.	June 1, 2022
		Clarified that calibration of temperature- sensing devices is done as necessary.	





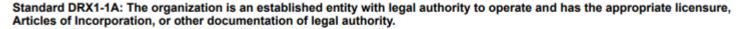
#### **ACHC Standards**

#### ACHC ACCREDITATION STANDARDS

Customized for Specialty Pharmacy Services

#### Section 1: ORGANIZATION AND ADMINISTRATION

The standards in this section apply to the leadership and organizational structure of the company. All items referring to business licensure including federal, state, and local licenses that affect the day-to-day operations of the business should be addressed. This section includes the leadership structure including board of directors, advisory committees, management, and employees. Also included is information about leadership responsibilities, conflicts of interest, chain of command, program goals, and regulatory compliance.



The organization is an established entity with legal authority to operate and has the appropriate articles of incorporation or other documentation of legal authority.

Legal authority is granted to one individual, members of a limited liability corporation (LLC), a board of directors, usually referred to as the governing body, and as allowed in state statutes for the appropriate type and structure of the organization. The entity, individual or organization has a copy of the appropriate documentation or authorization to conduct business.

If state or applicable local law requires a license or permit the organization posts the current copy in a prominent location accessible to public view in all locations/branches and/or in accordance with appropriate regulations or laws.

Evidence: Copy of all current applicable license(s)/permit(s) for each location

Services applicable: AIC, CRCS, CRDS, CRTL, Fitter, HME, IRN, IRX, MORX, MSP, RTS, SRX, SRXONLY









#### ACHC Accreditation Visits To Pharmacy & DMEPOS Providers

Overview of the ACHC Accreditation Survey





# Surveyors

- Who is your Surveyor?
  - Pharmacist
  - Expert on the pharmacy products and services you provide
  - 20-plus years of experience
  - USP and industry experience and knowledge
  - Completed comprehensive ACHC training
  - Completed required field training (precept)
  - Background checks and completed BAA
  - Selected for your survey based on experience
  - Asked to verify that survey does not create conflict of interest
  - You will not know the name of your Surveyor in advance



# Survey Day

- Based on the type of survey, your survey could be either announced, (SRXONLY), or unannounced survey, SRX with (DMEPOS)
- Your survey date is selected with several factors in mind:
  - The date you apply and submit all required information
  - The date your accreditation expires (for renewals)
  - A date of readiness selected by new organizations
  - Your selected blackout dates
  - ACHC-listed holidays
- On your survey day, the Surveyor will attempt to call the main number listed on your application; they will not leave a callback number but will state their name and that they will be arriving today for your survey
- When the Surveyor arrives, you are welcome to ask to see identification to verify their identity; the Surveyor should have a name badge with a picture ID
- Surveyor may show up any time during standard hours of operation



# Survey Day (Cont.)

- Try to keep your staff relaxed and focused
- Customers come first! (Just keep us in the loop)
- Perfection is not the goal of the day
- Almost everything can be "fixed"
- There is nothing your staff can say in an interview that will sink the ship, so relax!
- Deficiencies are common... and expected
- Don't get sidetracked by "What's my score?"
- Ask questions/seek clarification
- The Surveyor is not always correct, so challenge him/her





### Survey Day (Cont.)

- The Surveyor is only a data collector; the Surveyor does not play any role in the ultimate review decision or the status of your accreditation
- You will be given the opportunity to correct deficiencies during the survey day (if reasonable)
- Correcting deficiencies as you go eliminates the need to submit a Plan
  of Correction for those items, although the item is still recorded as a "no"
- If requested items cannot be located in a "reasonable time frame," the item must be marked as a deficiency



### Survey Day (Cont.)

- Opening conference (set the schedule for the day)
- Tour of facilities
- Staff interviews
- Personnel record review
- Patient record review
- Patient visits/interviews
- Review of logs and Medicare-required documents
- Review of PI/QI data
- Exit conference



### **Opening Conference**

- Begins shortly after arrival of Surveyor
- Management may invite all staff members
- Good time to gather information needed by the Surveyor:
  - Logs, inspections, reports
  - Licenses, bonds, insurance as required
  - Personnel list
  - Staff schedules
  - HR records
  - PI/QI data
- The Surveyor will use this time to set the schedule for the day



### Personnel Record Review

- Surveyor will review personnel records for key staff and contract staff
- Must be selected randomly by the Surveyor
- May include all staff members or only select ones:
  - Preferable to have someone from your organization review charts with us
- Looking for items to include:
  - Application, tax forms, I-9 (as applicable)
  - Job descriptions and evaluations
  - Verification of qualifications/licenses
  - Orientation records, trainings, competencies, ongoing education
  - Medical information (TB/HepB as applicable)
  - Background checks

For a complete listing of items required in the personnel record, review DRX4-1C of the ACHC Accreditation Standards.





### Client Record Reviews

- Client records must be selected randomly by the Surveyor:
  - Preferable to choose from a list/printout of payments (EOB)
  - Preferable to have someone from your organization review with us
- May include current patients and discharged patients
- Both billing and medical records:
  - Representative of the care/services provided
- Review of patient paperwork and education provided
- Review of Plan of Service/Plan of Care and updates

DRX5-1A details the requirements of the client record.



### PATIENT VISITS/INTERVIEWS

- ACHC Surveyors will expect you to arrange for us to visit patients/customers as part of your accreditation visit
- Please provide the Surveyor with a list of potential customers (who are within a reasonable driving distance)
- The Surveyor may also call some recent customers for a phone interview
- If you have a location that customers may come to for products and/or services, the Surveyor may ask to speak with some of those customers as well
- The customer needs to give you permission for us to visit or interview them (we do not require that it be in writing)



# Review of Logs & Medicare-Required Documents

- Training/in-service logs
- Referral logs
- On-call schedule/logs
- Infection control tracking logs
- Temperature logs
- Fire and disaster drill logs

- Maintenance, repair, and cleaning logs
- Complaint logs
- Surety bond, liability and vehicle insurance, organizational chart, budget, contracts/BAAs, required licenses



### Review of PI/QI Data

- Your Surveyor will expect to see evidence of ongoing PI/QI activities for the previous three years (if a renewal); PI/QI meeting notes alone do not meet these requirements
- If an initial ACHC Survey, documentation of a PI plan will be limited, but the plan should be in place with evidence that you have started the process
- If you are part of a large health system, your PI/QI data can be included in your corporate plan but you need to be able to show compliance with each requirement
- Refer to the Performance Improvement Made Simple Document located on Customer Central





# **Closing Conference**

- The ACHC Surveyor conducts a closing conference with the organization's representatives
- Management may decide which staff members attend
- Can provide a scheduled time for closing to accommodate phone participation by remote staff
- Surveyor covers all areas of noncompliance with reference to the standard requirement
- Great opportunity for you provide missing items or seek clarification
- The Surveyor cannot comment on how you performed, as they only collect and submit the data
- The Surveyor shall complete the closing conference by the end of the business day



# **During Your Survey**

- Management is welcome and encouraged to be a part of the entire accreditation process
- Deficiencies may be corrected during the survey, if practical:
  - The deficiency will be corrected on site but will be recorded as a "no"
- Seek clarification from your Surveyor while still on site:
  - If you believe they have misunderstood something, provide clarification
- Surveyors are experts in the industry and have hands-on knowledge regarding the implementation of the ACHC standards:
  - Take advantage of their knowledge and experience



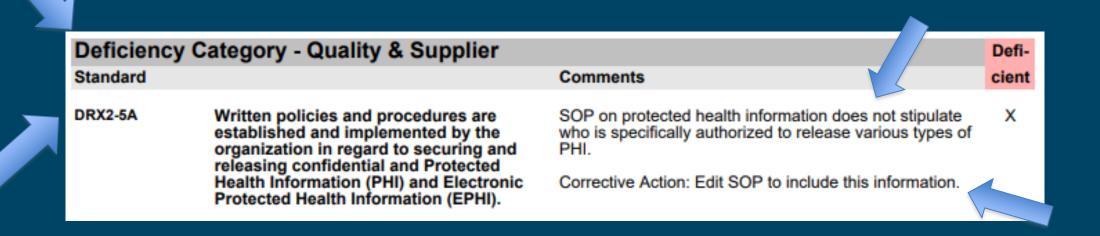
# **Initial Surveys**

- Initial surveys can be "complicated"
- The Surveyor is assessing your level of compliance with a set of standards by looking for evidence of compliance
- Evidence is limited because ACHC can only hold you accountable back to a "date of readiness" (the date you represented that you were in full compliance with ACHC requirements)
- As an example, let's assume that was 90 days before survey:
  - ACHC cannot hold you accountable for compliance prior to that date (but when you represent that you are in compliance, you must be fully in compliance)



### Summary of Findings Report for Survey on 1/14/20

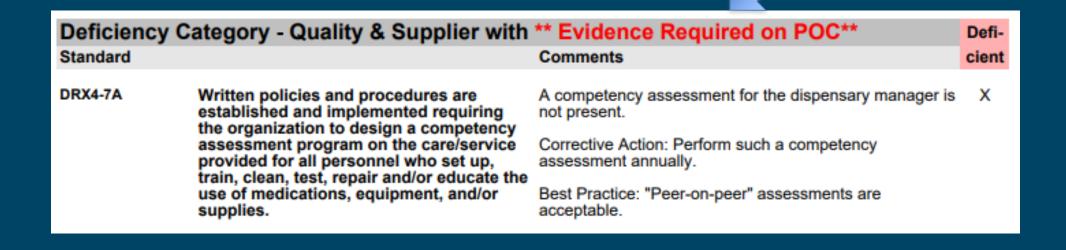
Services: SRXONLY





### Summary of Findings Report for Survey on 1/14/20

Services: SRXONLY





Deficiency Category - Interviews/Observations							
Standard		Comments	cient				
DRX2-4C	The organization provides the client/patient with written information concerning how to contact the organization, appropriate state agencies, and ACHC concerning grievances/complaints at the time of admission.	Best Practice: Be sure to include the ACHC phone number in patient information in case a patient wants to lodge a complaint.					
DRX7-11A	Written policies and procedures are established and implemented for identifying, monitoring, reporting, investigating, and documenting all incidents, accidents, variances, or unusual occurrences involving personnel.	Best Practice: Suggest adding fields for preventative actions needed to complaint and incident reports.					





### **ACHC Accreditation Decisions**



#### ACCREDITED

Provider meets all requirements for full accreditation status.

Accreditation is granted but Plan of Correction (POC) may still be required.\*



#### ACCREDITATION PENDING

**Provider meets basic accreditation requirements** but accredited status is granted upon submission of an approved POC.



#### DEPENDENT

Provider has significant deficiencies to achieve accreditation. An additional on-site visit will be necessary to be eligible for accreditation.



#### **DENIED**

**Accreditation is denied.** Provider must start process from the beginning once deficiencies are addressed.



### PLAN OF CORRECTION (POC)



DNCE COMPLETED, PLEASE EMAIL THIS FORM TO THE ATTENTION OF YOUR ACCOUNT ADVISOR

Organization: Greg's Pharmacy

Standard	Plan of Correction (Specific action taken to bring standard into compliance)	Date of Compliance (Date correction to be completed)	Title (Individual responsible for correction)	Process to Prevent Recurrence (Describe monitoring of corrective actions to ensure they effectively prevent recurrence)	POC Compliant (ACHC internal use only)	Comments (ACHC internal use only)
TCRX3-B	What would be a proper POC for this deficiency?	What's a reasonable time frame?		How do you prevent this from happening again?		





# Plan of Correction (POC)

- Required when a deficiency is found
- Must be submitted within 30 days from receipt
- Follow a specific format
- Submitting a thorough and complete Plan of Correction (POC) will expedite your accreditation
- All deficiencies require a POC
- Some deficiencies require evidence of correction



# Congratulations!







Questions?







# Thank you

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