



SHCC Advisory:

#DS01 – Daily Briefing/RFI Mitigation[©]

Since 2005 F&A associates have had an opportunity to directly observe a good number of SVNP surveys. In each case, the morning debriefing was a pivotal opportunity.

To capitalize upon that opportunity it is important to go beyond passive receipt of the updating provided by surveyors. The information they provide needs to be quickly analyzed for the specific purpose of determining what standard(s) are likely to be found non-compliant (i.e., result in an RFI).

Surveyors generally try to de-emphasize an organization 'keeping score' and otherwise tracking RFI during the survey. To that end, they may imply it is inappropriate to focus in that way. Typically, (especially on the second morning/first debrief) they will explain that it is too early for them to determine potential RFI's and that until scores are combined from all surveyors and/or processed by the computer they simply do not know. While this may be technically correct, it rarely represents the reality. By the end of the first survey day, most survey teams have obtained and sufficiently discussed key impressions and findings to know the potential/most likely sources of RFI.

Good, confident survey teams will share information about RFI's when appropriately asked. Teams that are less mature and/or lacking in confidence may not. In either case, it is critical that the organization ask. Unless it is already very clear, I would strongly encourage that you specifically ask for identification of the potential RFI's based upon the team's findings so far (the vaguer your language the vaguer their response).

If they demur, ask again! Allow that while a definitive answer is not possible, you would still appreciate their best guess so that you can ensure they have all the information they need to ultimately make a determination. In some cases, it is more felicitous and effective to ask the second or third time outside (before or after) the debriefing.

Either way, it is crucial that you have sufficient information about potential RFI so that you can implement a mitigation strategy. That strategy should include the following:

1 - Immediately fix/repair any life safety issue: Although fixes at the time of survey (ATOS) are not supposed to be accepted by surveyors any more, it does seem to mitigate intensity of findings and conveys appropriate concern/values to the team.

2 - Evaluate for yourself: Review the issue of concern for yourself -- and do so in more depth than the team if possible (e.g., review more charts than they did). If your findings support compliance (remember -- strategically, you simply need compliance with a sufficient percentage of the relevant EP) then that information should be packaged and presented



clearly to the team as soon as possible.

3 - Use the Issue Resolution sessions: Schedule time in these sessions to get greater clarification on potential RFI-related issues (this also causes surveyors to either get clear or abandon less than objective impressions) and/or present your data supporting compliance. Also a good time to ask if ATOS fixes/repairs are in the right vein and likely to facilitate/support future compliance.

4 - Alternately, if you have sufficient compliance data but the team does not accept it, the Issue Resolution session is a good time to indicate your interest in having a particular finding 'flagged'. This is still an option for the organization although it is not well known. This strategy can be very useful in the post survey period. TJC central office still reviews findings that are flagged or otherwise challenged. Those that are not reasonably supported by the surveyor can be overturned even before an ESC is provided.

The key point of strategy in all of the above is that in the new SVNP process, it is even more cost-effective to clarify, question and even constructively challenge survey findings before the end of survey. Every EP restored could save the organization a potential of 4 months of ESC/MOS work.

Good luck and God speed with the rest of the survey.

Richard A. Fields MD

PS: Please do not hesitate to call or e-mail us if you have questions about the ongoing survey process, findings or interpretations of standards. As an SHCC Member, you have 24/7 access to our resources for the entire time of your survey. If you have notified us, at least one of our associates will be on constant alert for your messages and provide you with prompt responses.

PPS: After survey, we can continue to support you through the ESC/MOS process.