

Sustainability Framework Improves Compliance

Process allows leadership, staff to overcome ongoing survey challenges

Client

The organization in question is a 300-bed tertiary care facility and teaching hospital with a large complexity of service, including outlying clinics and a large behavioral health population.

Background & Challenges

The Greeley Company was brought in to assist the facility in remediating the process elements causing repeated failures to clear a specific Condition of Participation. Once on site, Greeley consultants found a number of areas causing the facility's noncompliance with the specific condition.

The organization did not have a sustainable method for tracking its core process failures, lacked a strong event management system and quality program, and was using an exorbitant amount of resources tracking data that provided little insight into real problem areas. It also had an oversight issue, which is common for many hospitals, in which the organization tries to track a large number of things they believe will help bring them into compliance but without a method for ensuring that the information garnered by that oversight process is used to make sustainable improvements.

“We went in to not just help them with moving to compliance with the one condition “out”, we knew soon knew their whole quality and safety processes needed a strong framework for sustaining compliance,” said the Greeley consultant.

Greeley Findings & Solutions

Greeley consultants immediately introduced the organization to Greeley's philosophy of the need to balance quality, safety, and efficiency to achieve effective, sustainable corrective actions . . . including those that are citation based. Inefficient processes will evaporate over time, unsafe processes will not (and should not) last, and processes that do not enhance patient care cannot be sustained.

The organization needed to learn that compliance is a by-product of quality and safety, and needed to *understand* the regulation in order to design processes that would comply with the regulation over time, one Greeley consultant explained. The organization was focusing most of its attention on collecting data; it was not looking in the right direction. “They had volumes of data from inspections and monitoring, however, the data wasn’t analyzed and clearly wasn’t providing value. This is a common trap—organizations try to audit their way to compliance.”

To move the organization in the right direction, the consultants determined the best course of action was to work with leadership to implement Greeley’s “Framework for Sustained Compliance.” At the center of this framework is what the Greeley team calls “the fabric of healthcare,” which consists of the settings in a facility where care is delivered. Transecting these settings are health care processes (such as restraint management or infection control practices)—processes that must be compliant to provide care well.

In order to provide safe, quality care in an efficient manner, the fabric of healthcare must be bordered by the four sides of the framework:

1. **Communication** undergirdles the framework.
2. **Process implementation** is on one side (typically the area where problems nest, such as lack of a good policy/process system, insufficient staffing, inexperienced management, or challenges with documentation).
3. **Process monitoring**, the area where care monitoring, issue identification, and event management live, is on the other side of the framework.
4. Finally, the framework is covered by a strong, accountability driven **oversight system**.

Ensuring that all sides of the framework are considered when addressing problematic issues in an institution ensures a cohesive, solid healthcare fabric—one that does not unravel.

Through using the framework “we simplified a lot of their expectations, and helped leadership to identify and focus on core problems” said the consultant. “Many organizations get turned sideways because their expectations are way ahead of where they need to be, or where they should be, to establish compliance.” In this instance, the organization failed to address root issues that were causing repeated failures with components of the noncompliant condition.

With the core challenge—failure to focus on the true issues causing noncompliance and over-interpreting what the organization needed to do to bring itself back into compliance—uncovered, the next step was to craft implementable actions to get the organization back on track.

Working within the framework, Greeley consultants started by teaching an administrative assistant how to utilize and display data to make sure the data itself was informative and “told a story of where the

organization was heading.” The next step, after revising data collection and display, was to use the data to identify root causes and address the causative factors through “working the framework.”

“We helped them to pull back, refocus, simplify their actions and peel back a lot of the necessary over-work. We helped them focus on the core root causes of their challenges,” explained the consultant.

By assisting in the implementation of a data collection that was more simplistic, Greeley helped the organization get to the core of their existing issues.

The Greeley consultant noted another solution that Greeley employs as a standard practice, which is implementing an event management system that identifies any significant events that occur on a daily basis. This is to ensure hospital leadership has “no surprises” and that leaders are confident events are managed appropriately.

“Every day we held what we call a “RADAR” meeting, where any significant event and anything not working properly was seen by executive leadership,” explained the consultant. “All aspects of leadership were aware of what was happening and how fast it was moving so they could apply pressure and keep a handle on it. This meeting is to keep important issues and facts on leadership’s ‘RADAR.’”

These meetings allowed leadership to track where the organization was on a daily basis, if they were meeting their targets, if current practices were working, and, if not, what new elements had arisen that they must address.

The Greeley framework of sustainability was used to help build a core methodology of managing healthcare operations, which itself could be sustainable within the organization.

As stated above, the organization had a trove of data, but it was not presented in a way that made it useable information. Greeley consultants helped the organization refine its process monitoring.

“Process monitoring allows you to identify trends and patterns,” said the consultant. “We did a lot of work with them because they were expending so much energy monitoring things with were not beneficial to them.”

Using the framework, Greeley consultants saw the leadership group gel as useful data led actionable items. “The framework is a methodology—if for example they have poor oversight, we work with them on how to really craft a relevant, action-oriented agenda,” said the consultant. “We work with them on understanding what data analysis means, and what you have to take away from that. We try to create a roadmap for continued, sustained compliance.”

Greeley has not seen a survey failure in any situation in which they have applied their Framework for Sustained Compliance.

“You sustain compliance by understanding, as mentioned earlier, that compliance is a byproduct of safety, quality, and efficiency. Organizations can effectively balance these three crucial components of healthcare by using the framework as an operational methodology.”

ABOUT GREELEY

The Greeley Company

Headquartered in the greater Boston area, The Greeley Company serves administrative and clinical teams in more than 500 healthcare organizations nationwide each year—ranging from the largest healthcare systems and academic medical centers to critical access rural hospitals. We have a rich history of providing innovative consulting, education, outsourcing solutions, interim staffing, and external peer review to healthcare organizations nationwide. Greeley focuses on contemporary needs and challenges related to medical staff optimization & physician alignment; accreditation, regulatory compliance & quality; and credentialing & privileging.

Our mission

The Greeley Company's mission is to help healthcare organizations improve efficiency, comply with regulations and standards, achieve practitioner engagement and alignment, and excel in delivering high-quality, cost-effective patient care.

Our clients

Our clients include healthcare organizations of all sizes and types—from large, multi-setting healthcare systems and academic medical centers to critical access rural hospitals. We work with clinical and administrative individuals and teams across the entire organization including physicians, executives, directors, managers, and frontline staff.

Our advisors and staff

The Greeley Company provides our clients with a dedicated team of advisors who bring valuable experience and rich backgrounds as former hospital, nurse, and physician executives, as former “Big 4” consultants, and as former regulatory surveyors. Our professionals understand your pain and provide the breadth and depth of preparation, training, and education needed to drive success. Behind our advisors stand talented management and support staff committed to ensuring the highest level of customized attention and client fulfillment.

Contact us

Please contact us at 888/749-3054 or info@greeley.com for more information on how The Greeley Company can help you meet your challenges and goals.