

Business Practice Services (BPS) - Medicare Mock Survey (MMS)

Overview

<u>Objective:</u> Provide a service to ASTS members for review of policies and procedures and compliance in advance of a Medicare audit

<u>Service:</u> Perform a Mock Medicare Survey (MMS) to include the following:

- 1. Review policies and procedures
- 2. On-site chart review
- 3. On-site interviews
- 4. On-site debrief
- 5. Written report of findings

On-site chart review, interviews and debrief to be conducted in one day

<u>Why:</u> Provide mechanism to prepare for Medicare audits. The Medicare conditions of participation are new and Medicare has not routinely performed lengthy and detailed audits of transplant programs. Transplant programs are not familiar with the process and preparation can reduce anxiety, help streamline the process, and reduce the likelihood of cited deficiencies.

<u>Who:</u> Team of seasoned transplant professionals and regulatory counsel knowledgeable in the new regulations (Medicare Conditions of Participation for Transplant Centers Final Rule) including transplant surgeons, nurses, administrators and legal experts in federal regulation.

<u>Where</u>: Site visits to institution for chart review, interviews and face-to-face debrief. Advance document review of policies and procedures conducted off-site and written report sent to transplant program after site visit.

<u>How:</u> ASTS has been intimately involved in the development and interpretation of the Medicare regulations over the past three years and understands them. A Business Practice Committee was established to provide practical services to the membership. The committee identified Medicare Mock Survey as a service that could be useful to members.

Process

- 1. Transplant Center (TC) calls ASTS and purchases the service
- 2. ASTS staff (Sara McCurdy) processes the order and assigns survey team members
- 3. Surgeon initiates contact with program director (introduction, overview of process including surgeon role as advisor to on-site survey team and review of written report, requests point of contact (POC) for on-site survey team, discusses special emphasis requests)
- 4. Lead on-site surveyor contacts POC (establish contact, confirm advance document requirements, access to on-site charts, personnel, and schedules date for on-site survey)
- 5. Survey team reviews policies and procedures in advance
- 6. On-site survey and interviews conducted
- 7. ASTS issues confidential written report to program

Fee Structure*

One Program – includes adult, pediatric, living and deceased \$6,000 plus direct expenses (travel)

Two Programs (increase fee by 50% for 2nd program) \$9,000 plus direct expenses

Three Programs (increase fee by 30% for each additional program) \$10,800 plus direct expenses

Four Programs \$12,600 plus direct expenses

*Fees subject to change