

Health Services Advisory Group (HSAG) End Stage Renal Disease (ESRD) Network 17

The Roles of the ESRD Network and State Survey Agency (SA) in Monitoring Dialysis Care for California

HSAG: Network 17 serves 281 facilities and approximately 28,000 patients. One of 18 ESRD Networks in the United States and its territories, it covers Northern California, Hawaii, American Samoa, Guam, and Saipan. The Network works with its ESRD facilities, patients, and other providers of ESRD services to ensure that ESRD patients receive the right care at the right time.

California's State Survey Agency (SA), frequently referred to as "the state," is Licensing and Certification, a branch of the California Department of Public Health.

What is the difference between the "state" and the Network?

The "state," or SA, is **regulatory** and conducts certification, re-certification, and complaint surveys of dialysis facilities. These surveys verify that facilities are following the minimum health and safety rules that all Medicare and Medicaid participating dialysis facilities must meet, as set forth in the ESRD Conditions for Coverage (CfCs). By conducting and following-up on these surveys, the "state" ensures that ESRD patients receive safe, high-quality care.

The **Network promotes** and **supports** dialysis facilities in the provision of quality dialysis care and the achievement of positive health outcomes for dialysis patients. It assists facilities with quality improvement efforts by providing educational materials for both staff and patients; and acts as a mediator between facilities and patients in the event of disagreements or grievances. The Network sometimes collaborates with the "state" to achieve these ends.

How can ESRD Network 17 assist and support you?

The Network can:

- Share its knowledge of the CfCs and best practices from other facilities and ESRD Networks in order to help you achieve the best possible health outcomes at your facility.
- Provide quality improvement (QI) advice, tools, and resources to assist with dialysis-related topics.
- Educate patients regarding the standard of care for dialysis, and what is reasonable to expect in a dialysis facility.
- Mediate between your facility and patients to resolve grievances, help improve care, and enhance the patient experience.

Why call the Network for a consult?

Reaching out to the Network for a consult and working proactively:

- May help a facility avoid being issued a deficiency or condition during a survey.
- Shows the state and the Network that your facility is actively pursuing quality improvement.
 - This is especially helpful in the event the state inquires as to whether you have called the Network in the course of trying to address an issue in your facility.

Does the Network ever call the SA without telling you after your call?

If you notify the Network of an event that interrupted treatment, such as a water pump failure or a fire, the Network may encourage you to self-report the incident to the state. The Network may be directed by its contract with CMS to report the event to the state.

If, in the course of patient or facility contact, the Network becomes aware of any practice at your facility that constitutes immediate risk to patients or staff, it is mandated to contact the state for further investigation.

ESRD—Top 10 Most-Cited Deficiencies in California October 1, 2015– September 30, 2016*			
Rank	Regulations	Description	Frequency
1	494.30(a)(4)(ii)	Infection Control (IC): Disinfect Surfaces/Equipment/ Written Protocol	63
2	494.30(a)(1)	IC: Wear Gloves/Hand Hygiene	58
3	494.60	Physical Environment (PE): Safe/Functional/Comfortable Environment	39
4	494.80(a)(2)	Patient Assessment (PA): Appropriateness of Dialysis RX	38
5	494.30(a)(1)(i)	IC: Gowns, Shields/Masks—No Staff Eat/Drink	36
6	494.60(b)	PE: Equipment Maintenance-Manufacturer's Directions for Use	35
7	494.30	IC: Supplies at Station Disposable/Dedicated/Disinfected	34
8	494.150(c)(2)(i)	Plan of Care (POC): Manage Volume Status	34
9	494.30	IC: Sanitary Environment	33
10	494.60(c)(4)	PE: Hemodialysis Patients In View During Treatments	31
TOTAL			401

*For more information, link to CMS Survey Preparatory Tools: <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Dialysis.html>