



Solving Medicare Survey & Certification Issues for Skilled Nursing Facilities

A Conversation With Corky Rockwell, Manager at Wipfli LLP

How Prepared Is Your Organization?

Achieving or maintaining Medicare certification has grown more challenging for skilled nursing facilities (SNFs). Jane Jerzak, CPA, RN, health care partner at Wipfli, recently sat down with Corky Rockwell, RN, manager at Wipfli, to discuss the challenges SNFs face when it comes to preparing for Medicare surveys and especially in bringing their facilities back into compliance if they received F-tags.

Is your SNF at risk of losing its billing capabilities? Read the following Q&A to learn about your risks and what you can do to help ensure a successful survey and certification.

Q: What are your biggest concerns for skilled nursing facilities regarding survey and certification issues?

Achieving or maintaining Medicare certification has grown more challenging for SNFs. Ensuring they meet regulatory compliance standards means there must be ongoing accountability in developing, implementing and maintaining compliance-related systems. Facilities that have undergone a survey and have seen their amount of F-tags increase would be greatly served by bringing in a consultant to assess their processes and identify opportunities to close gaps and bring their facility back into compliance.

Q: What is the value of bringing in a consultant to get a skilled nursing facility ready for survey?

Bringing in a consultant prior to the survey to perform a mock survey helps identify vulnerabilities and gaps. It can go a long way in avoiding subsequent fines and/or the loss of billing capabilities.

In fact, it's a leadership imperative to bring fresh eyes to a situation that you see every day. This helps ensure your facility is ready for the survey and assists in identifying actual or potential issues that need to be addressed beforehand. The human factors phenomenon of seeing an action or a behavior and disregarding it as little or not important – or doing the same thing over and over and expecting different results – gets facilities into trouble with the accreditation and licensing departments of both state and federal agencies. The impact is too great to ignore.

The average director of nursing (DON) in a SNF is not nearly as prepared on their own to ensure success with surveys. If you are going through a survey, at the first sign of trouble – even before the exit interview – when you see the surveyors start digging, you need to get control of the situation. If you receive an immediate jeopardy (IJ), the state surveyors will not leave your building until the situation is corrected. Bringing in a consultant immediately shows the surveyors that you are serious about getting the help needed, while demonstrating commitment to getting back into compliance.

Meet Corky Rockwell

Corky Rockwell, RN, is a member of the Wipfli health care team. With more than 30 years of experience in health care compliance and nursing and staff development, Corky provides top-notch services, with a proven record of implementing significant organizational change while helping clients stay agile and competitive. She works with senior living facilities, hospitals and other types of health care providers throughout the U.S.

The consultant quickly becomes a coach and teacher to the DON and can help strengthen their processes and systems of oversight to ensure compliance. Many DONs have come up the ranks while learning on the job. A consultant can both facilitate correction processes and critically think through a plan for sustainability, supporting the administrator and DON in a way that results in compliance and new ways of thinking to make a big difference over time.

Q: What can be done after the survey process if things do not go well?

When the Form #2567 comes 10 days following the survey completion, outlining a huge list of corrections and requiring you to write a plan of correction, ask for help from experienced specialists. If you find that the agency has levied fines, or you are facing the possibility of not being able to bill for the services provided to your residents, don't delay in getting the help your SNF needs.

Top Five Survey and Certification Tips

Corky's experience working with skilled nursing facilities has resulted in five big tips you can use to stay proactive and understand when you need to take further action.

1. Make sure there are systems in place to close the loop on all high-risk processes, such as medication administration and daily reconciliation, physician orders, tracking of labs, skin rounds and wound care.
2. Perform monthly environmental rounds using a checklist that represents the issues addressed in surveys.
3. If the terms "harm" or "immediate jeopardy" are even spoken, the surveyors are now looking deeper and wider for evidence of substandard care. Take action immediately.
4. Address and follow up with quality measures regarding quality assessment and performance improvement (QAPI) issues.
5. Learn the prospective payment system (PPS) process, making sure your employees understand it and are documenting and using it.

Prepare for Your Medicare Survey

Thank you to Corky Rockwell for sharing how skilled nursing facilities can avoid survey and certification issues and help ensure compliance with ever-changing regulations.

Contact Wipfli to learn more about how we help SNFs achieve or maintain Medicare certification, or bring facilities back into compliance.

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