



Conditions for Coverage

Quality Assessment and Performance Improvement (QAPI) for ESRD Medical Directors

Medical Directors set the course for their dialysis center. Patients and staff members rely on the Medical Director to lead effectively. The Conditions for Coverage released on 4/15/08 by the Centers for Medicare & Medicaid (CMS) has updated the responsibilities of ESRD facility Medical Directors. As Pay for Performance (P4P) becomes a reality, it is increasingly important for facilities to achieve and sustain clinical performance targets in order to receive reimbursement. Medical Directors are encouraged to read carefully and become very familiar with the new Conditions.

The Medical Director has operational responsibility for the QAPI program and ensures that program data is used to develop actions to improve quality of care and must ensure that the facility's QAPI program is effectively developed, implemented, maintained, and periodically evaluated. The dialysis facility must maintain and demonstrate evidence of its QAPI program for review by the Centers for Medicare & Medicaid Services (CMS).

The table below contains a breakdown of some Medical Director QAPI and responsibilities.

Patient Clinical Outcomes	Reuse & Water Treatment	Patient Safety & Satisfaction	Staff Training	Involuntary Discharge of Patients *	Oversight of Attending Physicians	Biohazard & Infection Control	Facility Policies & Procedures
Adequacy of dialysis	Reuse program	Medical injuries	Ensure that staff receive appropriate education and training to competently perform job	Written and signed order from both Med. Dir. and attending physician prior to discharge	Inform medical staff of facility P&P including QAPI	Adverse events	Participate in developing P&P
Nutritional status	Deviations from AAMI standards (corrective action plan)	Medical errors		(Note: The new *discharge/transfer process is very lengthy, specific, and progressive.)	Written and signed order from both Med. Dir. and attending physician prior to pt discharge	Infection control issues	Assure the attending physicians & other staff adhere to P&P
Mineral metabolism	Water treatment equipment	Patient satisfaction					
Anemia management	Pt did not reach target weight	Grievances					
Vascular access						Assure the attending physicians adhere to P&P	

*The Heartland Kidney Network has additional resources on this topic.

The QAPI team includes all interdisciplinary members and physicians.

Work together to:

- Track
- Trend
- Analyze data
- Formulate strategies
- Intervene
- Set goals
- Set timelines
- Document your efforts