

# HEADS UP...

**TOPIC: Care, Treatment, or Services in Accordance with Physician Orders**

**SETTING: Home Care (OME) Programs**

## Why is this important?

Physician orders provide directions to the healthcare team regarding procedures, treatments, tests, medications and other healthcare services. These orders establish medical necessity and are delegated to ensure patients are receiving the appropriate level of care. Failure to properly document and follow physician orders can greatly impact the health and safety of patients within the organization.

## Scope of the Problem:

Time period: **January 1, 2019 – March 31, 2020**

Number of full surveys performed: **2,334**

Number of surveys with high risk SAFER findings related to care, treatment, or services in accordance with physician orders

**(PC.02.01.03 EP 8): 39 (2%)**

Observations identified within a specific topic area may reveal systemic areas for improvement across the organization. See also PC.02.01.03 EP 1.

## Sample survey observations [from surveyor notes] (and contributing factors)

- Non-compliance with physician orders or plan of care (e.g., physical therapist did not follow the orders for frequency of visits, wound care orders not followed, an 18 fr Foley catheter was ordered but a 16 fr Foley catheter was inserted).
- Organization had not reviewed orders and prescriptions for appropriateness and accuracy before providing care, treatment, or services (e.g., insulin orders was missing what times to administer the medication).

## Potential contributing factors:

- Process for monitoring/managing orders related to patient care, treatment, or services is unclear.
- Plan of care not properly updated or revised.
- Orders are incomplete, misinterpreted, or illegible.

## How to identify potential problems in your organization

### Review policies, procedures and protocols

- Does organization have defined process/procedure to ensure that the plan of care or initial orders accurately reflect the patient's care, treatment, or services?
  - Is there an auditing process to regularly review the plan of care?
- Is there a process to manage verbal orders?
  - Is readback a part of this process?
  - Are verbal orders taken by those authorized to receive and record such orders?
  - Are verbal orders authenticated? Does authentication include the signature of the practitioner and the date and time of the order?
- Does staff receive orientation and training to properly obtain/manage orders and update a patient's plan of care?
- Has the organization clearly identified who will be responsible for documenting/monitoring the plan of care?
- Is the plan of care reviewed for accurate orders during the 60-day case conference?

### Interview staff

- What is the process that is followed when a patient's status changes?
  - How did you communicate this to others on the care plan team?
- Does staff understand how to update and modify a patient's plan of care?
- How often is a care plan reviewed and updated for a patient?
  - Does this vary based on the type of care?

### Assess your environment

- Review physician order method (e.g., fax, telephone, computerized entry) and ensure it documents the appropriate information. This may include but is not limited to:
  - Reason for test, treatment, or service
  - Test, treatment, or service requested
  - Practitioner name, title, and signature
  - Date and time of order
  - Patient's complete name and medical record number?

### Evaluate implementation

- Review a sample of records to ensure that the plan of care was properly documented or updated per physician orders.
  - Review plan of care for treatments or services that change frequently (e.g., physical therapy, medication changes, wound care treatments)
- Observe/trace a process for managing verbal/direct orders.

### What are some resources that can assist in mitigating risks in these areas?

Complying with Medical Record Documentation Requirements: <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/CERTMedRecDoc-FactSheet-ICN909160.pdf>