

# Renal/Dialysis Provider/Practice Risk Assessment

<b>Provider/Practice Name:</b>		<b>Date:</b>	
<b>Provider/Practice Name:</b>		<b>Assessment Completed By:</b>	
<b>Names of Staff participating in Assessment</b>			

## Operational

1. Do you routinely review operational policy and procedures?
2. Do you review and update your disaster plan at least annually?
3. If you have electronic medical records (EMR), have your policies and procedures been amended to incorporate the use of EMR?
4. Do you educate and train staff at all times when changes are made to operational policy and procedures?
5. Are Patient Rights and Responsibilities and the Patient Grievance Process clearly posted?

Yes	No	NA	Comments

	Yes	No	NA	Comments
6. Do you have a confidential process for patients and staff to communicate concerns and errors?				
7. Do you have and implement a formal patient education program?				
8. Do you have a system in place to effectively monitor and support a patient's transition to dialysis?				
9. Do you conduct a meaningful patient satisfaction survey?				
10. Do you have a policy to address patient disruptive and abusive behavior?				
11. Do you have a formal patient discharge process that is equitably implemented?				
12. Does staff receive training on conflict management?				
13. Is your quality assessment and improvement program reviewed annually to assess its effectiveness and amended as necessary?				
14. Has your organization adopted best practices to prevent frequently occurring events including hand hygiene lapses, patient falls, medication omissions/errors, incorrect dialyzer, order omissions/errors, visual access of patient vascular access/catheter and staff non-adherence to procedures?				
15. Do you conduct routine visual audits to assess the events identified above?				
16. Do you conduct and document home visits for your home patients?				
17. Are supplies routinely checked for expiration status?				

	Yes	No	NA	Comments
18. Are equipment water and dialysate logs audited to assure entries are accurate?				
19. Do you conduct routine audits of the condition of your physical plant?				
20. Does your Professional Liability Provider include services for both implementation and development of a Risk Management Program?				
21. Do you conduct mock ESRD Conditions for Coverage surveys?				

## FINANCIAL

1. Does your organization have an accounting policy and procedure manual?
2. Are appropriate internal controls/checks and balances established and maintained?
3. Do you have appropriate procedures in place to help prevent or expose fraudulent activities?
4. Are bank reconciliations completed in a timely manner?
5. Is there a system to verify manual and electronic deposits and accurate posting of deposits?
6. Are financial reports completed in a timely manner?
7. Do you have a large number of year end and/or unusual transactions?

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	Yes	No	NA	Comments
8. Have there been significant changes in the organization's revenues or expenses?				
9. Are financial results fairly consistent across time periods?				
10. Does the organization have sufficient working capital?				
11. Does the organization have sufficient credit?				
12. Does the organization conduct random unannounced audits of inventory, cash, expense, purchasing, billing and other accounts?				
13. Do you have a system in place to routinely verify coverage?				
14. Is there a nondiscriminatory system for bad debt/collections?				
15. Are employees who handle cash bonded?				
16. Are Payment Card Industry Data Security Standards complied with?				
17. Do you conduct periodic third party supplier audits?				
18. Does your Crime Policy include coverage for Computer Fraud?				

## HUMAN CAPITAL

	Yes	No	NA	Comments
1. Have you reviewed and updated your employee handbook and has your staff been adequately informed of any changes?				
2. Are job descriptions reviewed and updated annually?				

	Yes	No	NA	Comments
3. Do you train managers on hiring, review, promotion and discharge procedures?				
4. Have you trained your managers on the Family and Medical Leave Act policies, protected leaves and other current regulations?				
5. Do you have a formal orientation/training program for contract employees / volunteers?				
6. Do you have a clear statement of prohibited acts of discrimination / harassment?				
7. Do you have an anonymous / confidential system in place to report harassment, wrongdoing, policy and procedure violations?				
8. Do you assess and document staff competency at least annually?				
9. Do you routinely assess licensing / certification requirements and compliance?				
10. Have you assessed your employment application to assure it is in compliance with federal, state and local employment laws and recruitment practices?				
11. Do you assess your organization's performance review process to assure it is fair across departments and job types?				
12. Do you periodically review market compensation rates to your organization's compensation rates?				
13. Do you conduct periodic audits to identify wage and hour, payroll and other administrative errors with the potential to trigger lawsuits?				

	Yes	No	NA	Comments
14. Are termination decisions reviewed by someone other than the supervising manager prior to termination?				
15. Do you periodically audit personnel files?				
16. Does your Employment Practices Liability Policy include Third Party Coverage?				
17. Do you have adequate Workers Compensation coverage? Does your Workers Compensation Coverage include a Workplace Safety Program?				

## STRATEGIC

	Yes	No	NA	Comments
1. Is your Board's structure and make-up reviewed and adjusted to assure the Board has the required leadership and skills to support and enhance the organization's mission and strategic plan?				
2. Do you have a succession plan in place?				
3. Do you periodically evaluate and update your strategic plan?				
4. Do you periodically conduct a SWOT assessment (Strengths Weaknesses Opportunities and Threats)?				
5. Do you have a system in place to monitor changing state and federal laws relating to your business operation?				
6. Do you periodically evaluate contracts and assure compliance by both parties?				

	Yes	No	NA	Comments
7. Do you periodically evaluate the cost benefit of directly providing vs. contracting certain aspects of your business?				
8. Does your organization conduct periodic review of current payor contracts and assessment of payors' ability to meet potential future obligations?				
9. Do you have a crisis management plan?				
10. Do you have a supply chain interruption back-up plan?				
11. Are you vulnerable to your partnership dependencies?				
12. Does your General Liability policy extend coverage to Allied Healthcare Professionals, Independent Contractors, and Medical Directors?				

## LEGAL AND REGULATORY

	Yes	No	NA	Comments
1. Do you periodically review and update governing body and medical staff bylaws?				
2. Is there a system in place to identify and assess potential Conflict of Interests of the governing board and management staff?				
3. Are Shareholder Agreements periodically reviewed?				
4. Is there a process in place to monitor changes in local, state and federal laws and the organization's compliance with the changes?				

	Yes	No	NA	Comments
5. Is there a system in place to review the organization's contracts to assure timely notice and assure all parties are in compliance with contract obligations?				
6. Have you updated your Business Associate Agreements to reflect new regulations?				
7. Do you have a Code of Conduct and has it been incorporated into policies and procedures across the organization?				
8. Are claims periodically audited and compared to medical records for accuracy and regulatory compliance?				
9. Are audits conducted to assess justifications for medical services?				
10. Are cost reports reviewed to assure compliance with current regulations?				
11. Do you conduct a periodic HIPAA compliance assessment?				
12. Do you have a HIPAA breach plan in place?				
13. Do you provide compliance education and training to all staff on a periodic basis?				
14. Do you have adequate Directors and Officers coverage? Does your Directors and Officers Liability Policy provide Full Entity Coverage?				

## TECHNOLOGY

	Yes	No	NA	Comments
1. Are employees trained on your organization's information technology (IT) and data security policies and procedures?				



	Yes	No	NA	Comments
2. Is there a formal Password system in place that includes staff training and monitoring for violations?				
3. Do you have a policy on use of social media?				
4. Do you have a policy for exchanging information via email and cell phone?				
5. Is there a system in place to monitor for violations of cell phone and email use?				
6. Is your wireless network secured?				
7. Are back-up and recovery systems adequate and are they routinely tested?				
8. Does your organization conduct periodic IT system Vulnerability Assessments?				
9. Have you implemented an encryption program and assessed its effectiveness?				
10. Do you have a system for monitoring computers / workstations for unapproved use/downloads?				
11. Is remote access monitored?				
12. Do all applications / software have current licenses?				
13. Do you have adequate Cyber Liability Coverage? Does your Cyber Liability Coverage include First and Third Party Protection?				
14. Does your Cyber Liability Policy include assistance following a Breach of Network Security?				