



Lymphedema/Compression Site Survey Checklist

Administration

- Compliance officer designation and corporate compliance policy (includes OSHA, HIPAA, FDA, state regulations, etc.)
- Facility must be separate from any other entity with a DMEPOS PTAN
- Corporate structure diagram
- Policy for detecting/reporting counterfeit supplies
- Vendor purchasing agreements
- Appropriately-displayed licenses/certifications
- Proof of sound financial management practices (e.g. budget, profit/loss, income statement, etc.)
- Comprehensive Liability Insurance policy with Palmetto GBA or Novitas Solutions and BOC listed as additional certificate holders
- Marketing policy in compliance with CMS non-solicitation requirements (e.g. no use of lead-generator services)

Consumer Services

- Instruction for patients related to the use, maintenance, potential hazards, and expected timeframes for delivery of equipment
- Delivery ticket verifying receipt of items, make/model/lot number, contact information for business hours, after hours, and emergency service
- Complaint policy noting facility will respond to complaints within 5 days and provide written notification of the results within 14 days. The complaint policy should include the contact numbers for BOC (877.776.2200), CMS (1.800.MEDICARE), and specific state consumer hotline
- Complaint log and individual complaint forms
- Primary business telephone at the site listed under the name of the business
- Code of ethics to be followed by the organization

Performance Management

- Performance management plan, including data collection methods (e.g. satisfaction surveys, complaint logs, billing and coding error logs, incident logs, customer/employee/vendor input) and policies stating how the data will be analyzed and services improved

Information Management

- Accurate, pertinent, accessible, confidential beneficiary records in accordance with HIPAA requirements
- HIPAA compliance policy
- Patient files to include pertinent documentation, in accordance with CMS guidelines, LCDs, and state/local requirements (e.g. prescription, physician's notes, Certificate of Medical Necessity (CMN), face-to-face evaluations, communication with the patient, delivery ticket, Advanced Beneficiary Notice (ABN), follow-up services, current CMS supplier standards, warranty rental and return policies, etc.)

Physical Facility Requirements

- Separate waiting area and chairs with armrests
- ADA compliant restroom(s)
- Appropriate private fitting area
- Handicapped accessible parking and entrance
- Visible signage with the address, name of company, hours of operation, and contact information

Product Safety

- Policy and procedure ensuring the facility will investigate and respond to incidents resulting in hospitalization/death within 24 hours and others within 72 hours of awareness
- Incident log contains all pertinent information, conclusions about what happened, and any changes in policy/procedure
- Emergency management plan, including provisions for continuing patient care if the facility cannot service its patients and individual responsible for contacting patients and other entities to ensure continued patient care (An alternate supplier agreement may be utilized)

Human Resources Management

- Employee files, including job descriptions, applications, OIG exclusion checks, W-4 or W-9, I-9, HBV letter, OSHA, HIPAA, and hazard communication training, licenses/certificates, annual performance evaluations, etc.
- Employee rights poster that is up to date and includes all federal, state, and local laws and regulations