## Lessons from the Field:

Proactive Strategies for Joint Commission Physical Environment Compliance



## Speakers



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## Agenda

- ► BWH Background
- Proactive Strategies
  - Mock Surveys
  - Document Review
  - Training
- Communication Strategies
- Lessons Learned



## Brigham & Women's Hospital

- BWH Medical Preeminence Dates Back to 1832
- #1 Nation Obstetrics and Gynecology
- ▶ 20,000 inpatient stays
- 2.2 million outpatient visits
- 20,000 employees and 5,000 scientists
- ▶ 75 FTE Building Trades
- ▶ 15 FTE Management
- ► Last JC survey: February 2025
  - ▶ 5 LS surveyor days





## BWH Preparedness and Competing Priorities

- Building expansions over the years stretched preventative maintenance resources beyond capacity
- ► Facility Condition Assessment Report completed in 2019. Many areas aged from severe condition to critical
- ▶ 10 days into starting at BWH we witnessed 92 water intrusion events related to the deep freeze event January 2023
- Project scopes did not always align with deferred maintenance plan
- Impact of construction practices on regulatory readiness
  - Storage in mechanical spaces
  - Renovation of pods in Tower fire alarm changes



## Annual Mock Survey Importance

- 1. Fresh set of eyes to review Physical Environment, documents
- 2. Catch project or repair related compliance issues early
  - ► Align remediation costs to the responsible party
  - Understanding true compliance standing
- 3. Identify priorities among competing needs
  - ▶ IS projects, real estate initiatives, research, department relocations
  - Tracking of gaps understanding where needs lie, where risk is/may become elevated
  - Consistent communication to Senior Leadership keep critical needs at the forefront



## BWH Annual Mock Surveys

- November 2023 (focused on Engineering spaces) and June 2024 (full hospital)
- ► EC and LS focused
- "Punch lists" for teams, identified high risk areas
  - Maintain progress on fixes/continuity
- SAFER matrix better framed the challenge
  - Comparison between visits
  - Communication to all leadership/team/regulatory
  - Mock survey "pickier" than JC
    - ▶ Prepare for the worst, hope for the best



### **Document Reviews**

#### **WHAT**

- ITM document reviews
  - Fire alarm & suppression systems
  - ► Features of fire protection
  - Emergency power systems
  - Medical gas systems

#### **WHY**

Help to identify gaps/patterns

#### **WHEN**

Performed twice/year since 2022





## Focused Trainings

#### **WHAT**

Basics of JC specific to Facilities& Engineering responsibilities

#### **WHY**

- Tailored to document review and mock survey findings
  - Required timeframes for ITM activities
  - Best practices for completing documentation
  - Look for "low hanging fruit"
- Boots on the ground
  - ► Familiarity with systems, processes, resources

#### **WHEN**

 1 training session/month in year leading up to survey

#### **WHO**

- Various levels management, supervisors, night shift
- New and seasoned staff!



## **Communication Strategies**

- Use targeted training sessions to communicate results from mock surveys/document reviews
- Guide training topics using reports, SAFER matrices
- Outside, third-party delivery strengthens the message - neutral, not punitive
- Creates a forum to ask questions, clarify, foster understanding





## Results & Lessons Learned

- No EC/LS condition level findings
- ► Team well prepared for JC survey
- Team continues to improve on day-to-day compliance activities
- Relationships built to continue to improve and learn
- Regular cadence allows for:
  - Frequent training and corrective actions on documentation
  - Continued focus
  - Continuous communication with senior leadership regarding priorities and influencing capital funding
    - ► Consider communicating at least quarterly
  - Setting priorities, evaluating strategies

**CHANGE IS COMING!** New JC Accreditation 360 standards January 2026!



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## Questions?

