

# Operating an OBSERVATION UNIT

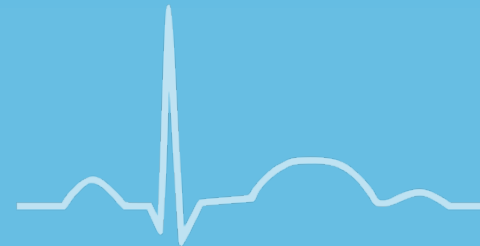
**KAY STYER HOLMES MSA, BSN, RN, CPHQ**  
ACCREDITATION REVIEW SPECIALIST



# Objectives

- 1 Provide a historical overview of observation medicine
- 2 Identify ten key steps to a successful observation unit
- 3 Analyze and apply the benefits of an observation unit

# Historical Overview



Medicare changed from cost based reimbursement to Diagnosis

Related Groups (DRG) -  
Observational services came to light

1980's

Outpatient Perspective Payment System (OPPS) begins

1998

Office of inspector general (OGI) study of observational services

2000

2001

Coalition (SCPC, ACEP, ACC, AHA, etc.) meets CMS on this issue:

Six point proposal supported by AHCPR research

New OBS APC (0339) created for 3 conditions

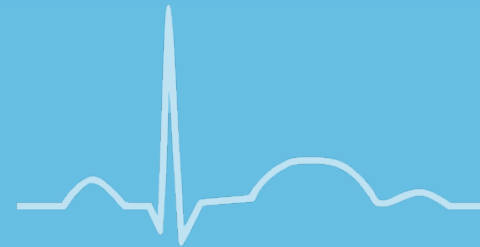
- Chest pain, asthma, CHF
- Multiple condition restrictions

2002

2007

New composite APC (8003) for all conditions

# What is Observation Services?

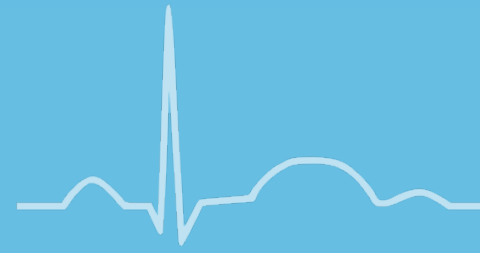


## MEDICARE DEFINITION:

A well-defined set of specific, **clinically appropriate services** include:

- ongoing, short term, treatment, assessment, and reassessment before a decision will require further treatment as:
  - hospital inpatients
  - discharged from the hospital

Medicare policy manual rev. 137 12-30-10

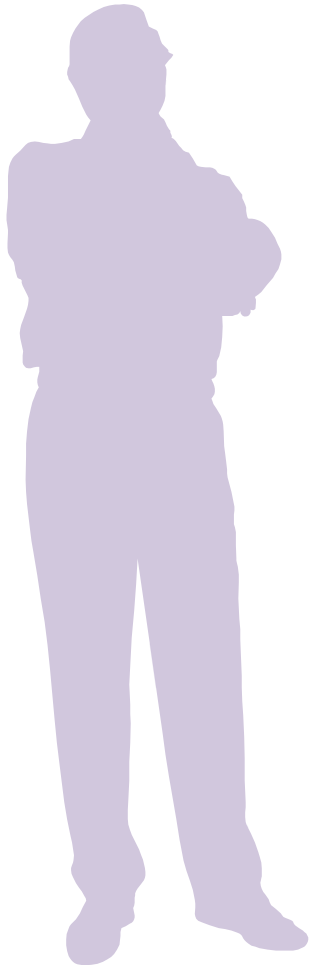
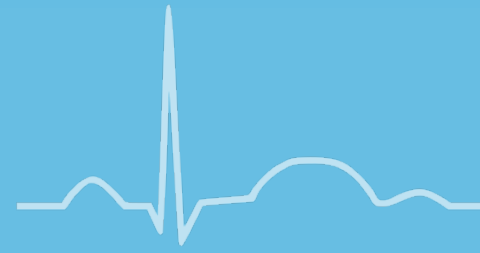


Observation services are those services:

- a) Furnished on a hospital's premises
- b) Includes use of a bed/periodic monitoring by nursing or other staff
- c) Reasonable and necessary
- d) To evaluate an outpatient's condition
- e) Determine the need for possible admission as an inpatient
- f) Ordered by physician
- g) Usually do not exceed one day
- h) May go for up to 48 hours
- i) Under unusual circumstances may exceed 48 hours

Medicare from HIM-10 455 (Pub. 100-2, Medicare Benefits Policy Manual, Chapter 6, 70.4)

# When Is Observation Appropriate?



## Based on 3 concepts:



Probability of disease versus harm of the potential disease under consideration

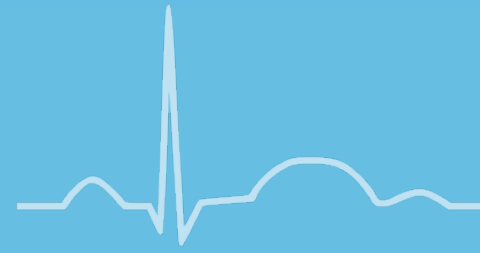


Need for further testing to make a definitive diagnosis



The patient's condition warrants further observation and evaluation by the physician

# Categories



Patients generally fall into two categories-  
*diagnostic treatment* versus *short term therapy*

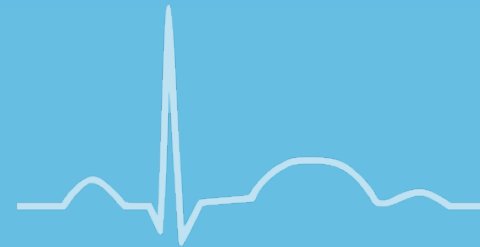
## ADDITIONAL TESTING

- Chest pain
  - serial biomarkers
- Syncope-resolve
- Abdominal pain-
  - serial WBC

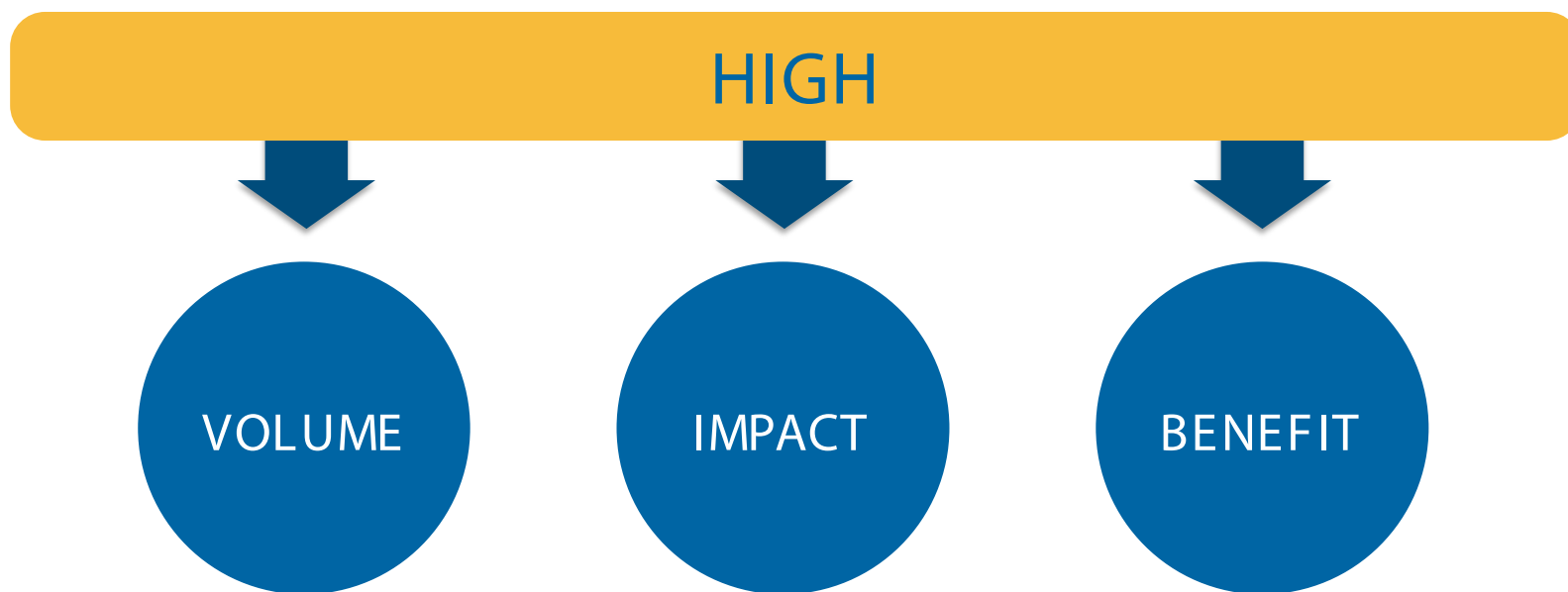
## SHORT TERM THERAPY

- Acute exacerbation of CHF
  - lasix, nitrate
- Cellulitis - IV antibiotics
- A-fib- medications
- Asthma
  - nebulizers, steroids

# Advantages of Observation Services

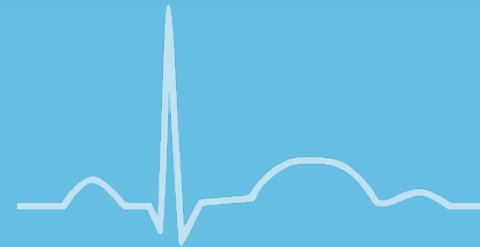


Observation services and units provide:

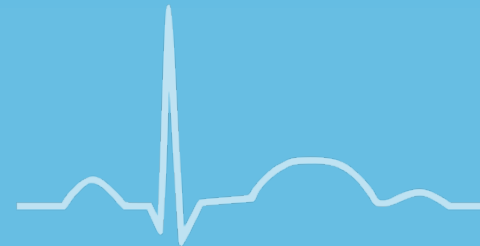




# Advantages of Observation Services



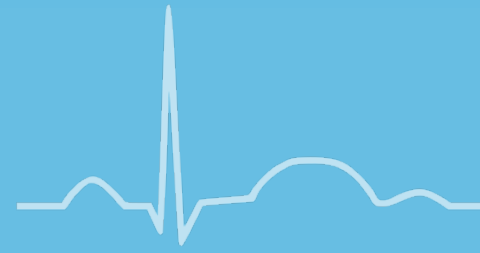
# Advantages of Observation Services



## 1. Meet 2014 CMS quality indicators



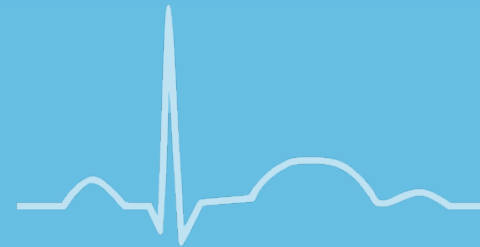
# Advantages of Observation Services



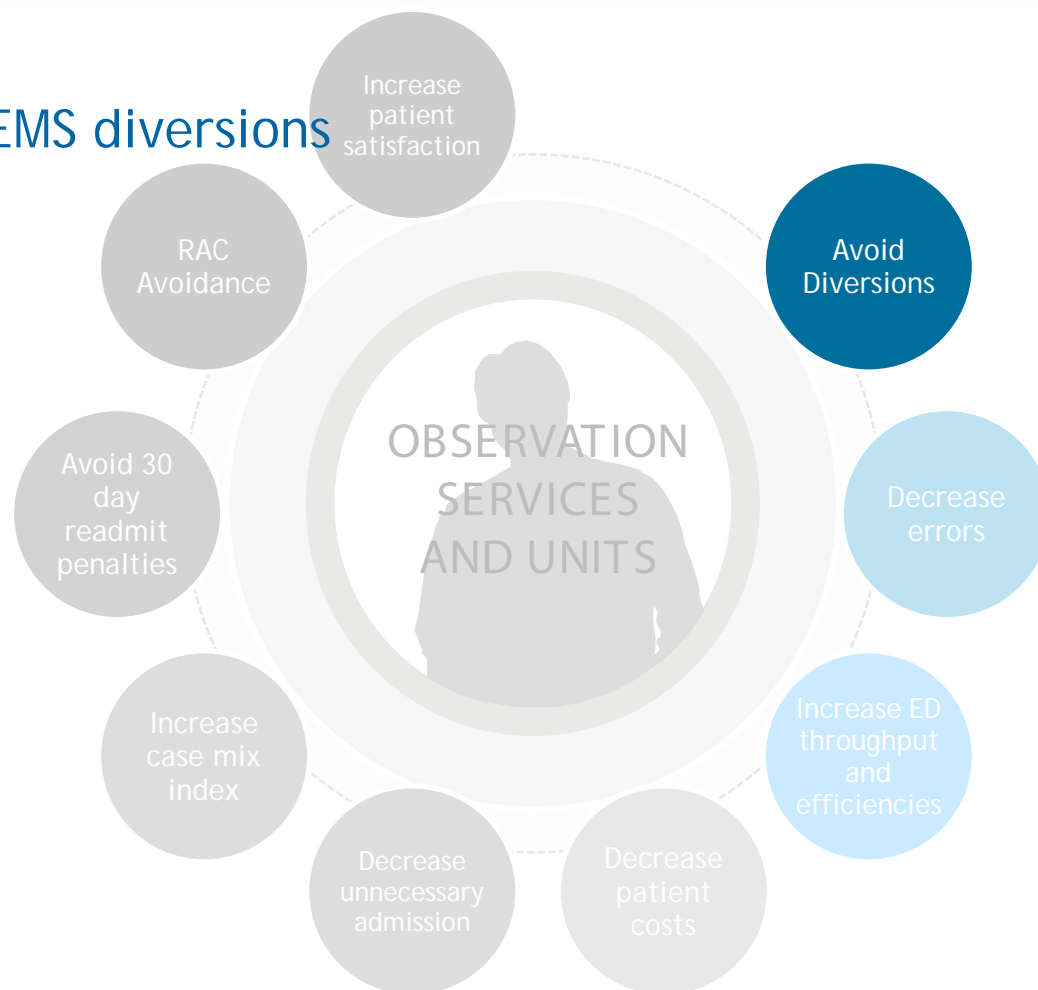
## 1. Meet 2014 CMS quality indicators:

- Median time from admit decision time to time of departure from the emergency department (ED) for ED patients admitted to inpatient status.
- Median time ED arrival to time of departure from the emergency room for patients admitted to the facility from the ED.

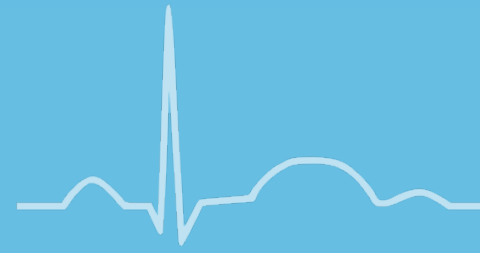
# Advantages of Observation Services



## 2. Avoid EMS diversions



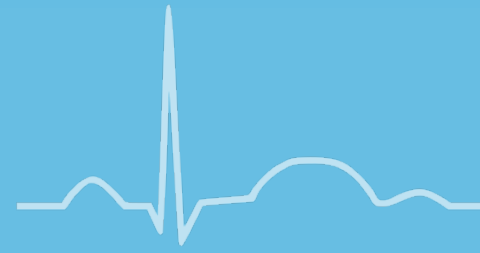
# Advantages of Observation Services



## 2. Avoid EMS diversions

- EMS business partner, national average for EMS ED volume= 15%
- Admission rate for patients via EMS = 34% nationally
- Nine Boston area implemented a diversion ban in January 2009.
  - What Happened?
    - Hospitals volume rose 3.6 percent after the diversion ban BUT length of stay dropped 10.4 minutes for admitted patients, while ambulance turnaround time decreased 2.2 minutes, according to a [study](#) in the December Annals of Emergency Medicine

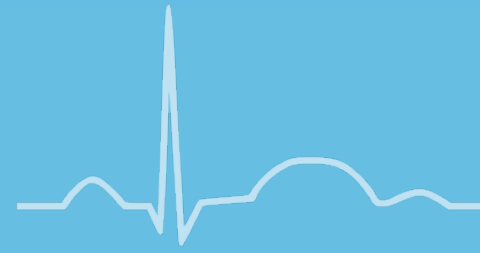
# Advantages of Observation Services



## 3. Decrease medical errors/liability

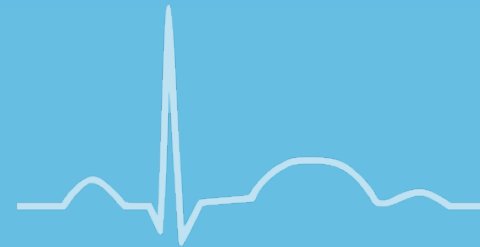


# Advantages of Observation Services



3. Decrease medical errors/liability
4. Increase ED throughput and efficiencies
  - Less boarding
  - Decrease Left Without Being Seen (LWBS)
  - Decrease ED LOS
5. Decrease patient costs
  - Make sure the patient understand they are in an outpatient status
6. Decrease unnecessary admission
  - Observation admission gives time needed to make a decision

# Advantages of Observation Services

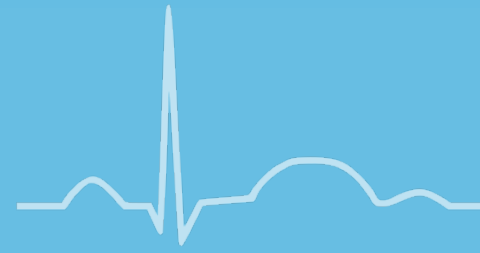


## 7. Increase case mix in



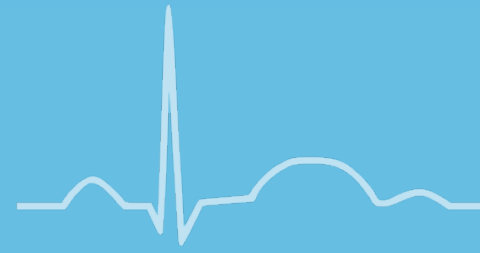


# Advantages of Observation Services



7. Increase case mix index
8. Avoid 30 day readmit penalties
9. RAC avoidance
  - One day inpatient stays
10. Increase patient satisfaction
  - Return to work, instant gratification-reality- halo effect on Hospital Consumer Assessment of Healthcare Providers and Systems (HCAHPS)

# Current Status



2003

19%  
EDOU USE

## National Survey

- *Emergency Department Observation Units (EDOU) in 19% of US hospitals*
- *12% planning a unit.*

2006

The Institute  
of Medicine  
Support  
EDOU use

The Institute of Medicine supported the use an EDOU to decrease ED boarding, ambulance diversion, and avoidable hospitalizations

2007

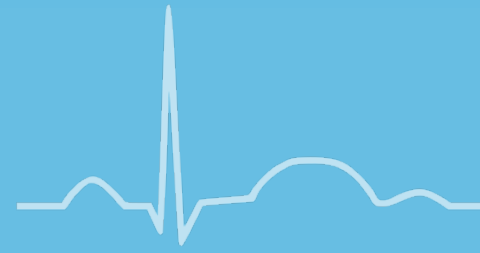
36%  
INCREASE IN  
USE OF EDOU

## National Hospital Ambulatory Medical Care Survey data:

- *the percent with an EDOU had increased to 36%*
- *with more than half managed by ED*

*Ross et al. Critical Pathways, 2012 The State of the ART: Emergency Room Observation Units.*

# Team Members



## Finance

Must be an expert in Observation billing

Must capture charges as well as time



## IT

Can the facility's software accommodate observation documentation?

Do not use the inpatient model-overkill, will cost staffing time



## Administrative Director

Where does the buck stop?

- Observation Medical Director
- Observation Nursing Director



## Facility Director

Addresses space issues

- Where is the unit located?
- Capital equipment expenses

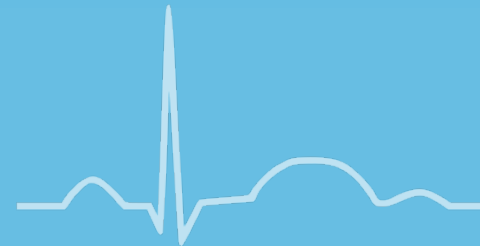


## Staffing Model

ED nurses rotate or dedicated staff??



# Team Members (cont.)



## Pharmacy

Must have protocols regarding patient taking home meds within OBS setting



## Case Management Utilization



## Education

Additional education for nurses/physicians to understand observation status



## HIM

Hospital Health Information Management



## Laboratory

Turnaround time for labs will directly effect LOS

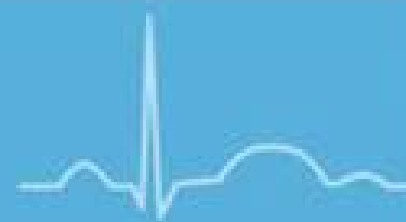


## Stress Lab Director

Turnaround time for stress testing will effect LOS



## PEPPER RESOURCE



Short-Term Acute Care



Program for



Evaluating



Payment



Patterns



Electronic



Report

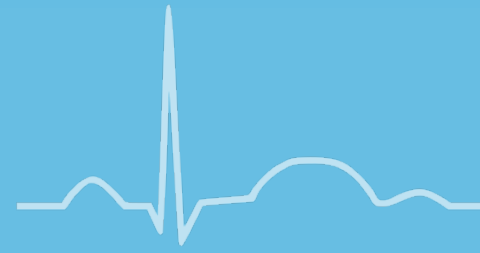
Website: [PEPPERresources.org](http://PEPPERresources.org)

- Report available to all types  
of hospitals ie: short and long-term, critical  
access hospitals

- Helps to identify trends and  
comparisons to other facilities

- Key for Observation Services

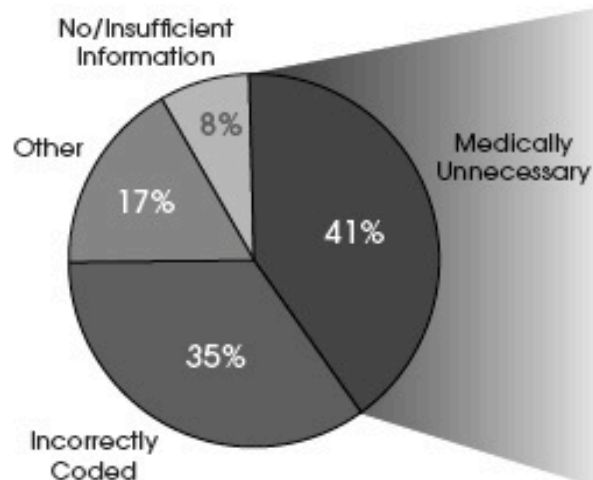
# RAC-Recovery Audit Contractor



- 1) Detect and correct past improper payments in the Medicare fee-for-service program
- 2) Provide information to CMS and to the Medicare claims processing contractors that could help protect the Medicare trust funds by preventing future improper payments.
  - All one day inpatient stays
  - If an inpatient is not discharged and the billing has not occurred the facility can use code 44 to convert the patient from inpatient to outpatient status

# A Justifiable Concern Over One-Day Stays

Overpayments by Error Type,  
RAC Demonstration Project



Top Five Medically Unnecessary Services

*Paid Claims Error Rate, 2007*

Service Type	(DRG)	Paid Claims Error Rate	Projected Improper Payment
Chest Pain	(143)	20.1%	\$118M
Medical Back Problem	(243)	15.5%	\$59M
Esop <sup>2</sup> /Gastroent <sup>3</sup> /Misc Digestive Disorder	(182)	11.9%	\$164M
Nutritional/Metabolic Disorder	(296)	10.7%	\$99M
Circulatory, Card Cath <sup>4</sup> WO Comp <sup>5</sup>	(125)	9.8%	\$46M

84% of American Hospitals Association's survey respondents indicated that medical necessity denials represented the most costly and complex form of denials.

More than 50% indicated they spent roughly \$10,000 managing the Recovery Auditor (RAC) process during the second quarter

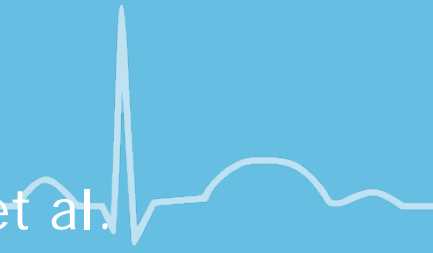
- 9% say they spent more than \$100,000.

<sup>1</sup> Due to  
<sup>2</sup> Esoph  
<sup>3</sup> Gastro  
<sup>4</sup> Cardia  
<sup>5</sup> Withou

Source:

# Observation Research

American Journal of Emergency Medicine 2003, Mace et al.



## Average LOS

75% < 18  
hours

Number of patients placed in observation unit

91% > 3100

Percent admitted to an inpatient status after an  
observation study

25-40%

Number of observation beds

91% had 16  
beds or more

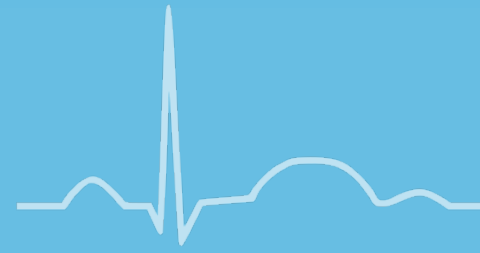
Number of observation units in operation

91%

Nurse to patient ratio

4:1





## National level:

- Use of observation care after an ED visit increased from 0.6% in 2001 to 1.9% in 2008

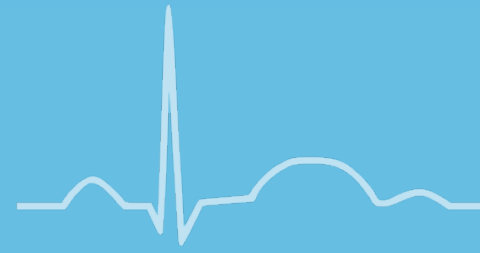
## Simulation model:

- \$3.1 billion in annual national cost savings from 2.4 million avoidable inpatient admissions.

The use of observation care in the setting of a dedicated unit should be included in health policy and delivery reform discussions and payment systems should be evaluated to encourage changes to support it.

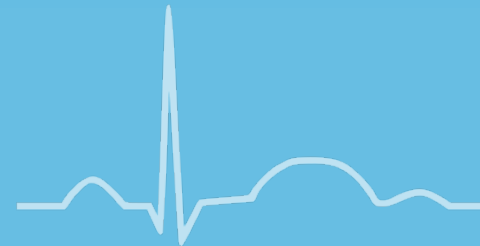
*Baugh, c et al. Health Affairs, October 2012*

# Emory Study

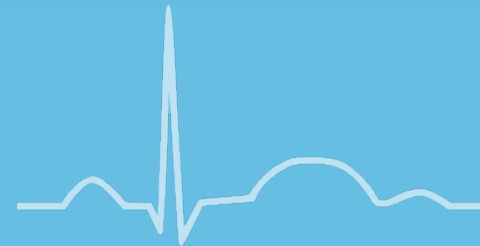


## Characteristics of the 18 Participating Hospitals

- Total # ED visits- 1.28 million
- Total # Hospital Responders -18
- Average # Hospital Beds -602 ( $\pm$  213)
- Hospital Inpatient Occupancy %-82.3 % ( $\pm$  8.5%)
- Average ED Visits in 2007
- 75,570 patients ( $\pm$  24,895)
  - Average # ED Beds 59 ( $\pm$  19)



Average # Beds in the EDOU	13.3 ( 7.4)
Percent of ED census that is <i>observed</i>	7.2% (+ 6.7%)
Number of EDOU beds per ED beds	4.25 ED beds / 1 EDOU bed
Number of EDOU beds per ED visits	1 EDOU bed / 7,461 ED visits
Daily number of EDOU pts / EDOU bed	1.14 patient / bed / day



Average # ED Patients Observed	4,430 ( 3,478)
% of EDOUs Located Within/Adjacent to ED	82.3%
% of 'CLOSED*' Units (EM only)	93.8%
Average ED Length of Stay for EDOU Patients	4.2 hours ( 1.6 hrs)
Average EDOU Length of Stay	15.7 hours ( 3.8 hrs)
% Discharged From EDOU	82.4% ( 4.3%)

# Society of Cardiovascular Patient Care CPC Observation Survey

Sent 789 Surveys Sent  
Response Rate 11.5%

Number of Observation Beds	8
Ratio ED Beds/Observation Beds	3.8 :1
Number of Observation Patients per year	1550
Percent of patients discharged after treatment	89.1%
Length of stay	19.5 hours

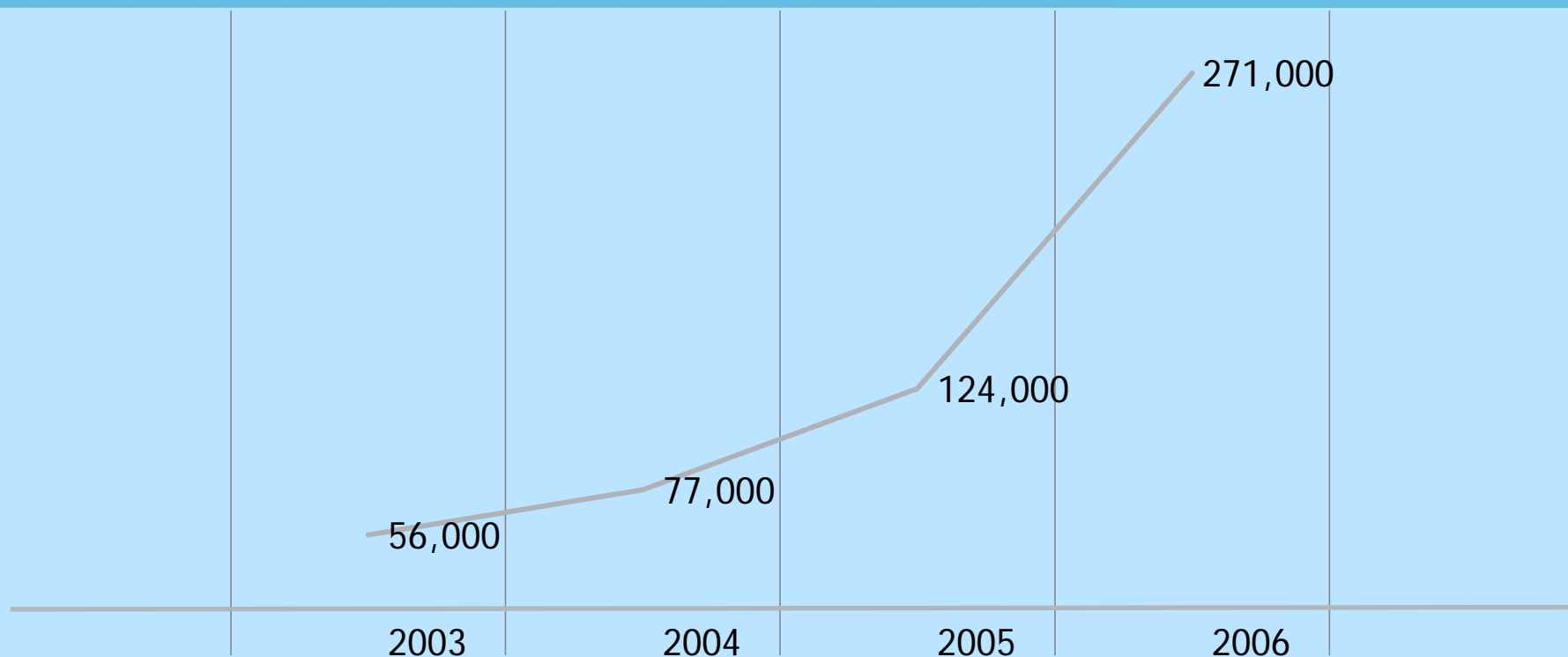
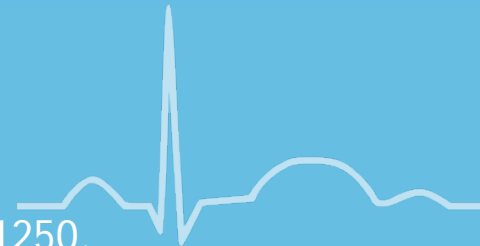
# Society of Cardiovascular Patient Care SURVEY QUESTION

## MEDIAN

Number of inpatients beds	250
Percent Inpatient Occupancy	70%
Number of Emergency Department Beds	27.5
Number of ED visits annually	41,660
ED length of stay prior to Observation (hrs)	3.18 hours

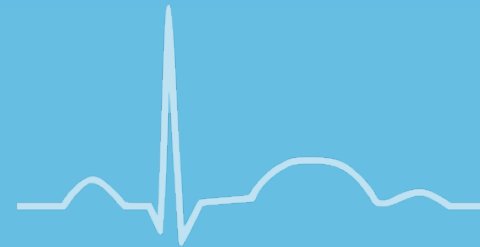
# Medicare Observation Claims

National Hospital Ambulatory Medical Care Survey: 2003 Emergency Department Summary Advance Data Number 358. 38 pp. (PHS) 2005-1250.



For every **1,000 Medicare admissions** in 2009, there were another **116 observation care visits**, 34 percent more than in 2007 -Brown University

# Types of Observation Units



## CLOSED UNIT

- Limited admitting physicians
- In a designated area

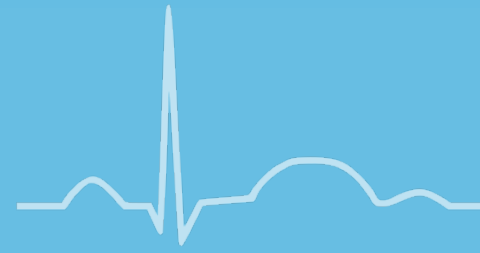
## OPEN UNIT

- All physicians can admit
- Patient can be placed in "virtual bed"



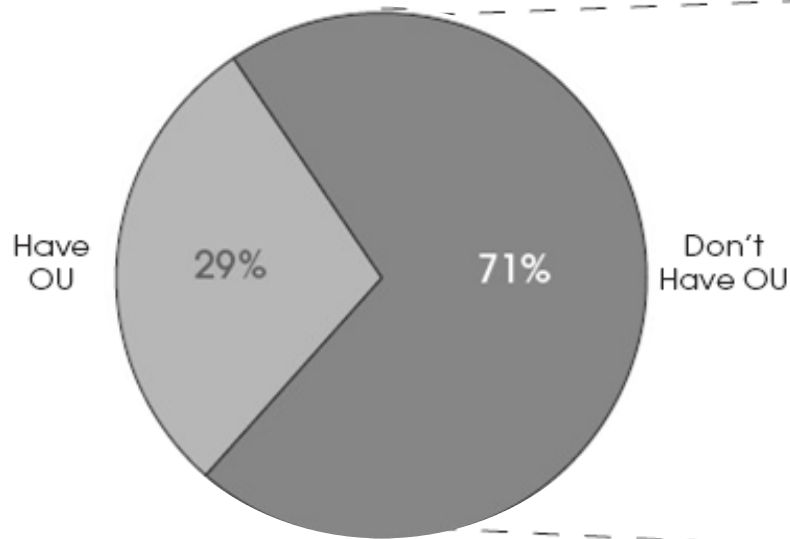
# Out of Sight, Out of Mind?

## The Challenge of Managing Virtual Patients

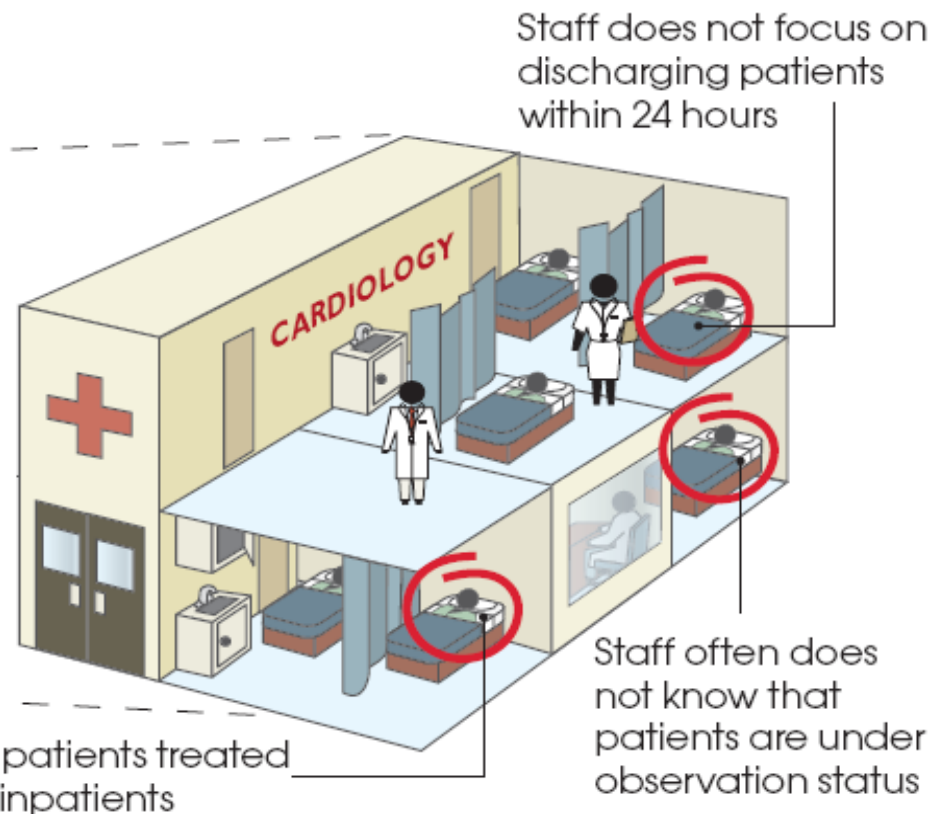


Clinical Advisory Board Members  
with Observation Units

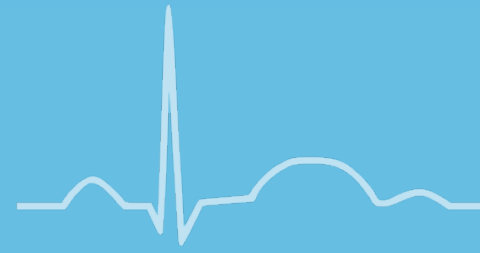
n=32



Mixed Across  
Disparate Patient Locations



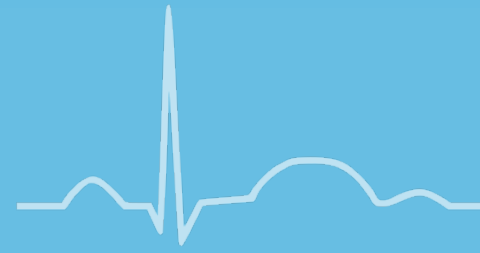
# Staffing



- A 2003 survey reported that units were staffed with an average 4.2 patients per nurse
  - Reality -5 patients per nurse
- 21.4% used associate providers (physician assistants or nurse practitioners)
- ACEP endorses Emergency Medicine oversight of observation unit
- Many facilities use mid-level providers to cover the units as physician extenders

*Mace SE, Graff L, Mikhail M, Ross M. A national survey of observation units in the United States. Am J Emerg Med. 2003;21:529-53*

# Physician Time



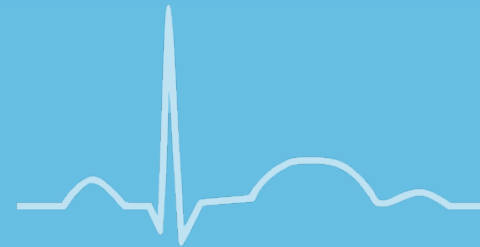
In a physician work-time study by Graff:

- the typical ED patient required 22 minutes per case
- observation patients required a total of ...58 minutes per case

*Although these patients are requiring less than one half of the amount of emergency physician service per hour (amount of work divided by length of stay), their total amount of emergency physician work required is more than double the overall average ED patient.*

*Graff estimated that for every 3000 patients observed, one physician full time equivalent (FTE)*

# Physician Documentation



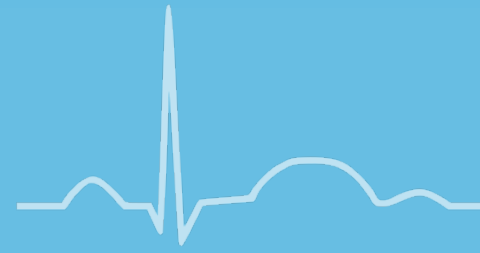
- Document Emergency H&P
- Separate Observation documentation
  - Order to place patient in observation status time and date
  - Note medical necessity and risks
  - Treatment plan
  - Progress notes regarding ongoing care
  - Discharge note should include:
    - Final exam
    - Course of treatment
    - Final diagnosis
    - Final disposition

# Non-Qualifications for Observation Services



- Routine stays after surgery
- Diagnostic testing
- Outpatient therapy/procedures
- Normal post-op recovery time
- Convenience stays
- Stays prior to outpatient surgery
- Stays over 48 hours
- Stays while awaiting Extended Care Facility (ECF) placement
- Routine prep
- Recovery from a diagnostic procedure

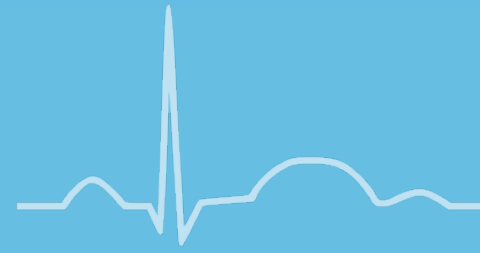
# Suggested Metrics



## Observation Metrics

- Length of Stay- by diagnosis
- Utilization
- Percent observation to inpatient conversion
- ICU admissions
- Work with finance to determine financial measurements
- No. patients/EDOU bed/day
- Cardiac Biomarker TAT

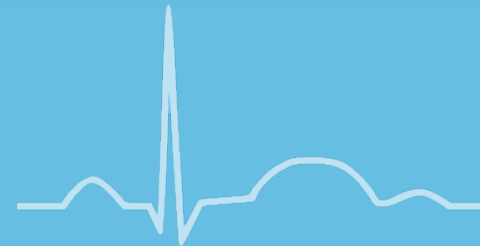
# Suggested Metrics



## Emergency Metrics

- Decrease left without being seen
- Length of stay in ED
- Return visits with 7-14 days
- Decrease boarding hours
- Decrease ambulance diversion hours- translates to revenue
- Cardiac biomarker TAT

# Summary



The key to wellness and  
its efficacy is in cost avoidance  
-it is not in cost prevention.

The objective is to decelerate  
the trend in rising health care costs.



# Lab can help impact Outcomes!

- Leadership in guidelines applied to practice
- Drive quality at all Levels
- Be patient centered and outcome-oriented
- Communicate and collaborate with all disciplines



# SCPC Resources:

[www.scpcp.org](http://www.scpcp.org)

[info@scpcp.org](mailto:info@scpcp.org)

SUBJECT LINE:

*SCPC Observation Subject-Matter-Expert: Kay Holmes*



SOCIETY OF CARDIOVASCULAR PATIENT CARE



# Contact:

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SOCIETY OF CARDIOVASCULAR PATIENT CARE