Tips for Working With External Reviewers

Leaders are responsible for creating a culture of quality and safety within a highly regulated industry. Five tips for working with regulators are presented from a leadership coaching framework.


Professional development educators often put considerable time and effort into developing programs. Assessing needs, establishing outcome-based objectives, considering pedagogy to foster active learning, finding source materials (human and reference), attending to site details, and evaluating impact all take time and considerable program-planning expertise.

Yet, there are times when educational offerings may be overproduced. The Leadership and Development column in this issue of The Journal of Continuing Education in Nursing provides a simple tip sheet approach for working with regulators. The health care industry—a high-stakes and high-cost proposition—is among the most regulated of all industries currently. Individuals fulfilling leadership roles must do so with an eye toward accreditation and regulation, as most standards represent minimum expectations for industry compliance. In my experience, the more that leaders and professional development educators examine the context and framework from which regulatory standards are developed and examined in total, the more streamlined training and development can become.

Early in my career, I enjoyed a role in a professional development educator position, charged with preparing organizations’ leadership and staff for accreditation visits. Later, as a consultant to organizations preparing for hospital accreditation visits, I experienced how leaders and staff responded to me as a consultant—as though I was an actual accreditation site visitor (the term external reviewer will be used in the remainder of this column). In those experiences, simple training techniques that were frequently reinforced best served the organization. Communication with the external reviewer could undermine good systems and detailed preparation.

Having an external reviewer survey the organization, whether invited or involuntary, is not business as usual. Although most external reviewers are professional in their approach and demeanor, urban myths exist about survey experiences (steeped in some truth) that can lead professionals to seek refuge from the experience.

KNOW THE TYPES OF REVIEWERS AND THE STANDARDS

Different kinds of external reviewers visit health care organizations, and the agencies they represent range from monitoring for minimum standards (health and life safety structural-based reviews such as those found in Medicare and Medicaid conditions of participation reviews; Centers for Medicare & Medicaid Services, n.d.), to process- and outcomes-based quality and safety reviews (The Joint Commission, 2015), to reviews for compliance with optimum standards (such as those linked with the American Nurses Credentialing Center’s Magnet® Recognition Program, n.d.). Other reviews may be investigatory in nature, due to a formal consumer-based complaint or breach in quality. When onboarding new leaders or professional staff, the types of reviews (and hence, the nature of the reviewers) common to the organization in which they practice should be explored in preparation for these important survey events.

Generally speaking, all reviewers receive training for their roles, but the training can vary substantially. Some accrediting or regulatory organizations use volunteer reviewers, whereas some always use paid staff to conduct the work of conducting a site visit. Because variation in train-
ing occurs, knowledge of standards is important. External reviewers must practice within the boundaries of their authority and responsibility to the standards linked to the body they represent. Comments during a survey process that go beyond their reason for being there are usually disqualified from the site visit findings.

TIPS FOR WORKING WITH REGULATORS AND REVIEWERS

When training leaders and professional staff, five tips can lead to successful outcomes of a survey visit (and these tips can be created on a bookmark or other simple training guide—a strategy useful for retaining information).

Tip One: Speak With a Unified Voice
Whenever possible, leaders and professionals should speak with a unified voice. This tip shows preparation and consistency in fulfilling the organization’s mission, purpose, and goals. When common meaning is derived, using language consistent with accreditation standards, it ensures that all parties are fluent in communicating with understanding. For instance, a regulator may want to examine clinical outcomes data. In some organizations, the term patient experience has replaced the term patient satisfaction. Clinical outcomes data may be separate from patient satisfaction data. In other organizations, the data may reside in risk management. So, although the data may exist, the language and location of data must be communicated with a unified voice, showing clarity with the standard being reviewed.

Speaking with a unified voice also references shared experiences in training and development and demands recall of internal and external training opportunities—some system wide, others unit based. Finally, the priorities and key direction of the organization should be known by all, including the important policies and practices linked especially to safety practices.

Tip Two: Dissent With Dignity
If there is dissent, dissent with dignity and not out of anger. It should never have to be said, but it is amazing how many times individuals will use a regulatory body site survey to air organizational issues and problems. That is not a proper forum in which to do so. Further, a trained surveyor will uncover issues and problems without an individual or individuals using the time to act out. Be clear that this does not mean that important information should be hidden from a surveyor; it relates to the style and tone used to carry out a personal agenda. It is helpful when facts and data are used to answer questions framed by the external reviewer. This adds credibility to the speaker. Further, if a speaker wants an external reviewer to know information that is opinion based, then it should be stated as such—for example, “It is my opinion that many improvements have been made in our approach to patient safety, especially falls and medications errors.” If several individuals offer differing opinions, it becomes the task of the external reviewer to interpret those differences.

Tip Three: Answer Questions Directly
Questions asked by an external reviewer should be answered directly and concisely, without embellishment. Nervousness when placed in an uncommon situation is a universal response. Some people perspire, others blush, but most start to speak more rapidly, without thinking, or rambling, with a need to fill silence. Too often, an external reviewer picks up anecdotal information that may not be germane to the purpose of the review during these types of one-to-one or small-group interactions. The desire to please an external reviewer may even lead to unintentional fabrication of answers. Simply answer the question posed, thinking about the reason for the question. Answer it in a succinct and direct manner. If the external reviewer wants more information, the reviewer should drive the car in the direction it is destined to go. If the responder needs clarity about the question, the question should be restated or repeated for clarity. Many responders may not know that it is okay to not have an answer, but the response should be confident: “I am unsure of how to answer your excellent question, but I will certainly find an answer for you, and I know just who to ask.”

Tip Four: Be Appropriately Assertive
When a reviewer asks an open-ended question for the purpose of discussion, be appropriately assertive. Some questions are intentionally broad, often for the purpose of observing how the team works together, how information is exchanged, and as a basis for drilling down into more specific questions. Broad-based questions are ideal opportunities to reflect knowledge of the standards and pride in the professional work that is represented in the organization. Responders are advised to steer responses away from the issue of the day, again with the reminder that a regulatory visit is not the setting in which to air non-substantive issues that could lead to downstream issues with a regulator. External reviewers are as interested in success and positive outcomes as they are in concerns. Both are part of organizational reality.
Tip Five: Answer Truthfully

Always answer truthfully, as you know it. That said, know that there are different truths based on where you sit in the organization. Be aware that views vary based on perspective, so try to think about the whole truth. A statement such as “The way I look at this safety issue from my role is...” leaves room for others to present how it might look from an alternative perspective. This response is both truthful and helpful.

SUMMARY

A respectful tone always benefits the external reviewer and the organizational responders. Organizations are imperfect, and external reviewers do not expect perfection but rather a culture aimed at upholding their standards to protect the public from a quality and safety perspective. They are benefitted by experiencing a learning organization and one that seeks continuous improvement.

Crash courses in regulatory standards and how to comply with them are often too dense for easy memorization. Applied learning in persistent, bite-sized pieces of knowledge is a useful way to be in a state of perpetual readiness. In the example provided in this article, being ready to interact with an external reviewer is part of the preparation necessary for success. The five tips provided can be applied with any regulator as a way of “leading on” through regulatory success!

REFERENCES