



Top 10 Accreditation Deficiencies

Deemed & Non-Medicare Deemed Status Surveys

Overview

- AAAHC's 2024 Quality Roadmap highlights high-deficiency areas across ambulatory and deemed surveys
- Top issues impact compliance, patient safety, and CMS Conditions for Coverage
- Focus: Documentation, credentialing, infection prevention, medication safety, emergency preparedness

Top 10 Deficiency Areas

- 1. Emergency preparedness / drills
- 2. Documentation management
- 3. Credentialing & privileging
- 4. Infection prevention & control
- 5. Pharmaceutical / medication management
- 6. Medication reconciliation
- 7. Allergy documentation
- 8. Facilities & Life Safety Code compliance
- 9. Clinical record completeness
- 10. Governance / oversight of contracts

Emergency Preparedness

- Frequent deficiencies: lack of scenario-based drills, incomplete disaster plans
- Applies to both deemed and non-deemed surveys
- Key risk: inability to respond to internal or external emergencies

Documentation Management

- Missing, inconsistent, or poorly controlled records
- Deficiencies across patient charts, policies, logs
- Compliance requires standardized documentation practices

Credentialing & Privileging

- Common issues: delays, incomplete files, weak privileging
- Risk: unqualified providers performing procedures

Infection Prevention & Control

- Weak programs, gaps in monitoring
- Breaches in hand hygiene, HLD/sterilization
- Required by both accrediting bodies and CMS standards

Medication / Pharmaceutical Management

- Issues: storage, security, labeling, vaccine handling
- Prevention of diversion, controlled drug oversight

Other Key Deficiencies

- Medication reconciliation omissions, inconsistencies
- Allergy documentation lack of reaction details
- Facilities & Life Safety Code fire safety, egress
- Clinical record completeness missing notes
- Governance / oversight weak board or contract review

Deemed vs Non-Deemed Surveys

- Deemed (Medicare) surveys include Life Safety
 Code & CMS Conditions for Coverage
- Non-deemed: focus more on core standards
- Deemed: increased scrutiny of environment, waivers, governance
- Both: high risk in emergency preparedness, infection control, and documentation

Summary

- 2024 data highlights persistent risks in emergency preparedness, documentation, and credentialing
- Pharmaceutical management now among top
 5 deficiencies
- Facilities / Life Safety Code issues are especially critical for deemed status
- Addressing these 10 areas is key to survey readiness

