Statement of Deficiencies	(X1) Provider/Supplier/CLIA Identification Number 05P001	(X3) Date Survey Completed 04/02/2014
Name of Provider or Supplier Lifesharing	Street Address, City, State 7436 Mission Valley Road, San Diego, CA	

For information on the provider's plan to correct this deficiency, please contact the provider or the state survey agency.

(X4) ID Prefix Tag	Summary Statement of Deficiencies (Each deficiency should be preceded by full regulatory or LSC identifying information)
Z0000	The following reflect the findings during a recertification survey conducted by the Centers for Medicare and Medicaid Services (CMS) from March 31, 2014 to April 2, 2014.
Z0096	ADMINISTRATION AND GOVERNING BODY CFR(s): 486.324(f) The OPO must have procedures to address potential conflicts of interest for the governing body described in paragraph (d) of this section. This STANDARD is not met as evidenced by: Based on interview and review of policy and procedures, the OPO's governing body did not consistently include in the written policy the frequency in evaluating and disclosure of any potential conflict of interest with the activities of OPO. Findings include: Review of the Governing Body policy Document Number: ORAS-008 with "Routing Approval Process-2/4/14 revealed the University of California (UC) Regents is the Governing Body of the OPO. The document also indicated that The UC San Diego Health System Governance Advisory Committee (GAC) will provide oversight for annual review of policies. The Conflict of Interest policy with effective date of 1 /31/14 established guidelines to avoid any potential conflict of interest between an OPO employee or agent and OPO or the UCSD. The policy further stated that the OPO will comply with all UCSD policies and procedures regarding conflict of interest. The employee training policy indicated that employees will annually review and acknowledge the OPO's conflict of interest policy. Interview with OPO staff on 4/2/14 revealed that GAC members acknowledge and sign the "Code of Business Conduct" bi-annually as required by training. The OPO staff also stated that the form is signed upon employment and as part of mandatory training as UCSD employee. Review of the Code of Business Conduct form revealed a section related to "Avoidance of Conflicts of Interest or Commitment." Random review of five

	acknowledgement forms revealed that the conflict of interest forms were signed bi-annually and not annually as required. During an interview of the OPO staff on 4/2 /14, a current list of members of the GAC and the Advisory Board was provided. The staff indicated that the Advisory Board members sign a form "Disclosure of Outside Interests and Activities and Statement Regarding Such Interests and Activities." The form revealed that all members of the OPO's Advisory Board and GAC (Governing Body as delegated by the Regents) shall be completed and submitted to the OPO's Executive Director for review annually. Review of 11 of 20 disclosure forms for the current members of the Advisory Board revealed the forms were not signed annually. In addition, these disclosure forms were not signed by members of the GAC. When asked of the missing 2011 disclosure forms, the OPO staff stated that an executive assistant who was in-charge of the disclosure forms went on leave and never came back, thus the 2011 disclosure forms were never recovered.
Z0125	MEDICAL DIRECTOR CFR(s): 483.326(d) The OPO's medical director is a physician licensed in at least one of the States or territories within the OPO ' s service area or as required by State or territory law or by the jurisdiction in which the OPO is located. The medical director is responsible for implementation of the OPO's protocols for donor evaluation and management and organ recovery and placement. The medical director is responsible for oversight of the clinical management of potential donors, including providing assistance in managing a donor case when the surgeon on call is unavailable. This STANDARD is not met as evidenced by: Based on record review and interview the OPO's medical director did not conduct an annual review of each surgeon's credentialing records. Findings include: On 4/2/14 at 1:15 p.m. during an interview with the OPO's medical director, he stated that he is currently working on improving in his responsibility for assessing the credentials of the procurement surgeons. Review of the responsibilities unique to the OPO's Medical Director Document Number ORAS-007 effective 9/14/12 revealed "Responsible for the on-going assessment of the surgical and technical credentials of procurement surgeons and physicians providing services to Lifesharing." Review of the Recovery Surgeon Credentialing and Responsibilities effective 1/31/14 stated, "An annual review of each surgeon's credentialing records will be performed by the Lifesharing Medical Director. An update of the required documentation is requested every three years and when license expire."