Brightly

Compliance efficiency through the power of technology

Table of Contents

Introduction

Compliance efficiency through the power of technology

In today's healthcare world, compliance is top of mind for everyone from the C-suite to the maintenance and operations team — and being compliance ready is now a daily expectation for healthcare professionals. With all of its minute tasks, overwhelming number of codes and intricate requirements, compliance may be the most difficult part of your job. It requires a lot of time, energy and resources that you probably don't have to lend.

According to the 2017 Healthcare Compliance Benchmark Study,[1] audits, tracking and limited staffing for compliance resources are the top concerns and challenges in the next 12 months. The survey also showed:

Biggest barriers to compliance success:

Allocate existing funds in the most appropriate manner

- Justify budget increases to Administration

- Justify new initiatives to bring dollars back into the budget

What is driving the growing resources needed to remain compliant?

An increasing focus and audits from CMS, an increased focus from the Office of Civil Rights/HIPAA compliance and revenue protection, according to the compliance study.[1]

"Auditing from regulatory agencies and payers is increasing and therefore driving the compliance program priorities. The requirement to monitor and audit internal compliance processes and controls has never been more important for organizations to be well prepared for the regulators."[1]

Having significant findings from a regulatory agency can be expensive with the 60-day window for bringing findings into compliance and, in some cases, lead to stiff penalties. So, how do these professionals, who are already wearing so many hats when it comes to budgeting, safety and day-to-day tasks, make compliance a priority?

Technology has become an important tool for many healthcare organizations (HCOs) to track compliance efforts and compliance readiness, simplify reporting and maximize resources.

The use of technology can empower operations professionals and those across departments to more efficiently carry out their daily tasks and promote being compliance ready.

Chapter 1
Being thorough and confidently compliant

Managing the compliance process through technology can be compared to an EHR (Electronic Health Record), but in this case it is an Equipment History Record (EHR). Regulatory agencies look for the accuracy of equipment documentation with as much scrutiny as you would an electronic health record.

According to ConvergePoint, there are seven key elements to an effective healthcare compliance program:[2]

7 key elements

O Written policies and procedures (for training, disaster recovery, etc.)

O A corporate compliance officer and compliance committees

O Effective training and education

O Open lines of communication

O Enforcement through well-publicized disciplinary guidelines

O Auditing and monitoring

O Corrective action plans

"Note that all seven of these elements stem from having written, detailed policies and procedures for your healthcare organization. These documents need to be organized, reviewed regularly and in a system to help your compliance team manage the policies and procedures and the program as a whole."[2]

In addition, each of these seven key elements can be improved with the use of technology, from creating corrective actions to communicating to reporting. If you're using paper and binders or an outdated system, you will struggle to keep up with the fast-changing environment of compliance.

The good news is there is a better way to feel confident about your compliance measures and know where to focus your efforts.

With tools like a modern **maintenance management system**, you can let technology do the hard work for you – monitoring compliance codes, documenting compliance-related tasks and using mobile communication to be more efficient across the board.

In this e-book, we look at the barriers to compliance and the key elements to a solid compliance program.

Next, we review five key areas of compliance, the changing codes and standards effecting them, peer experiences, and how technology is being applied to meet those codes and standards.

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"We currently do our EOC Rounding on a clipboard. Our last round was done at the end of a month and by eight days into the following month, I still had not gotten the report back from it. Using technology will help us improve the process by enhancing the communication and show accountability between the different departments."

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Rebekah Shelton
Plant Operations Coordinator, Kingman Regional Medical Center

Chapter 2
5 compliance areas to watch

To make it easier on you and your staff, we are highlighting five areas of compliance that have either undergone significant compliance standard changes and/or are frequently cited: infection control, fire and life safety, medical gas and vacuum systems, utility systems, and emergency preparedness. We share the applicable standard changes, peer experiences and how to leverage technology to achieve regulatory compliance — so you can be ready for whatever the regulatory bodies throw your way.

1. Infection control

Infection control is something that affects everyone, from your patients' health to your staff's, so it should not be taken lightly.

In an article about better infection control compliance, Donna Armellino writes, "Monitoring physicians' and staff's adherence to infection control guidelines is crucial for preventing infections and ensuring patient safety. Surveillance also helps leaders identify barriers to noncompliance."[3]

What is important for operations to know about infection control?

Operations and facility management teams have a critical role to play in infection control.

"The health facility manager's role in infection prevention and patient care has become increasingly more important as health care-associated infections (HAIs) have become a growing concern," according to an article in Health Facilities Management magazine.[4]

They boil their role down to four key areas to watch:[3]

1. Improper pressurization and ventilation of sensitive patient areas

2. Dust and contaminants from construction sites

3. Legionella growth in utility and potable water systems

4. Contamination of sterile compounds in hospital pharmacies

Monitoring Air Pressure

Air pressurization affects three of the four above issues: patient sensitive and sterile areas, as well as construction. Monitoring air pressure throughout your building is becoming a key area of focus of CMS/The Joint Commission (TJC). Facilities are managing this in a number of ways from manual inspections to automation.

Construction

CDC reports indicate that an estimated 5,000 people a year die from HAI (Hospital Acquired Infections) related to construction.[1] Construction can cause changes in air pressure, and moisture and dust levels, creating a dangerous environment for patients, staff and the construction team. There are a number of ways that technology can support a flawless execution of hospital projects.

Technology can keep you up to date on changing K-Tags. These are CMS required codes and standards that must be met, even if they are not required by your accrediting organization (AO). For construction, a K-Tag to pay special attention to is K791.

K791 - Construction, Repair and Improvement Operations: Construction, repair, and improvement operations shall comply with 4.6.10. Any means of egress in any area undergoing construction, repair, or improvements shall be inspected daily to ensure its ability to be used instantly in case of emergency and compliance with NFPA 241. 18.7.9, 19.7.9, 4.6.10, 7.1.10.1.

> "
>
> "For our annual air balance testing, we color code the rooms that need to be tested on the online floor plan, using a unique color corresponding to the type of room. We also have the rooms to be tested in a list format, as well."
>
> "

William Gruber
Senior Director Facilities Operations,
Geisinger Health

Legionnaires'

Legionnaires' incidences have been on the rise steadily since 2000, which has created the need for hospitals to establish water management programs. CMS even released a memo stating that healthcare facilities must develop policies around preventing Legionella growth in water systems.[6]

Explore this Legionella toolkit

Learn more

Water management procedures and policies, along with undergoing risk assessments, can not only prevent bacteria growth, but can help keep you and your team up to date on what you need to do and why.

How do you more efficiently manage infection control with technology?

Here are a few ways you can improve how you manage infection control and your communication around it:

Implement a water management program

Technology Tie-In: With a CMMS (computerized maintenance management system), you can store procedures for water management, track specific tasks, schedule preventive maintenance for water treatment and more.

Use technology to map the connectivity of your water treatment system, HVAC, electrical, plumbing, etc.

Use a system for monitoring air pressure

Tech Tie-In: Within your CMMS, use a map or floor plan feature to indicate rooms that should be either positive or negative.

Use a mobile device to immediately report air pressurization issues and set the priority level to high, assuring that the work order advances to the top of the list.

Utilize notification features to notify all affected parties of the problem and when it has been resolved in real time.

Tie construction practices to compliance

- Tech Tie-In: Identify high risk patient areas within CMMS mapping technology. Next, set parameters within your CMMS to require the completion of an ICRA (infection control risk assessment) prior to any work orders being assigned in those areas.

- Require ILSM (Interim Life Safety Measures) be completed before a project can begin in any area that involves an asset related to life safety, such as a fire door, fire suppression system, etc.

- With a mobile device and facility asset barcode, you can take photos of any concerns and attach them to work orders. Life safety related concerns can be programmed to take a priority.

- Schedule a daily inspection of egress that is a high priority. The system can be set to roll this and other high priority tasks over to another technician if necessary. This helps you avoid missing a life safety milestone.

Keep an eye on CDC guidelines

- Tech Tie-In: Link work orders and tasks related to this standard within your CMMS to appear in reports and during inspections. Take photos of any concerns and attach them to work orders.

Improve your reporting on infection control

- Tech Tie-In: Easily run reports on all activities related to life or fire safety assets on demand for CMS, AO or hospital administration.

Stay up to date on compliance codes

- Tech Tie-In: Connect tasks to specific codes and compliance concerns and keep a record of completed tasks. Use location-based inspections and Environment of Care (EOC) rounding technology to ensure your team is carrying out their work properly.

Why is infection control compliance so important?

It's not just about checking the boxes when it comes to infection control compliance — it's about promoting health and saving lives. There's a strong connection between your maintenance management practices around water, air, equipment and patient health, so it's important to set a standard, stick to it and ensure you're documenting every action you take to promote effective infection control.

The right technology can help you do that, while allowing you to complete tasks faster and more thoroughly, and preparing you for any compliance inspection.

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"Having technology added to our EOC Rounding will be a huge asset to our facility. Our current process consists of the following: One team member completes the round, then the person is tracked down and the information is obtained. When all surveys are done, the information is compiled into a work list, and that list is disseminated item by item to various members of the maintenance team (employees and contractors). To follow up on the list, phone calls and conversations are necessary with manual documentation to track and close out."

"

Dean Stoughton
Chief Safety Officer, Ohio Valley Surgical Hospital

1. Fire and life safety

As you know, this is a big one. Fire and life safety compliance includes procedures that directly affect the safety of your staff and patients, and they depend on the quality of your processes, procedures and documentation.

What is important for operations to know about fire and life safety?

According to an article in the September 2017 issue of the Joint Commission Perspectives newsletter, four of the top 10 most cited fire and life safety findings in hospitals are:7

1. **Automated suppression (LS.02.01.35)** - The hospital provides and maintains systems for extinguishing fires, including 18" sprinkler clearance, items on sprinkler pipes (not hanging from ceiling), missing escutcheons, blocked fire extinguishers, etc. This area focuses on your staff's knowledge of how to use portable fire extinguishers, as well as assuring your automatic sprinkler systems are not impeded in anyway, by corrosion, paint or objects hanging from the ceiling.

2. **Protection (LS.02.01.30)** - The hospital provides and maintains building features to protect individuals from the hazards of fire and smoke. This focuses on protecting your occupants from the effects of fire, smoke and heat through a system of building components that comprise a smoke barrier. This system of components includes walls, floors, doors, smoke dampers, managed penetrations, corridor doors, latching and hazardous areas.

3. **General requirements - building and fire protection (LS.02.01.10)** - The goal of this standard is to protect occupants from fire, heat and smoke. Fire protection is made up of a system of building components that include walls, floors, doors, fire windows, fire dampers and managed penetrations. As a system, these building components provide a safe haven in case of emergency. If any one part of the system is altered or damaged, it can cause your fire protection to fail.

This can even be caused by innocent acts like a wall penetration to run a cable or a staff member propping a door open.

4. **Means of egress (LS.02.01.20)** - The hospital maintains the integrity of the means of egress. There were significant changes to this area in the 2012 edition of NFPA 101, Life Safety Code.

Specific Codes

- K232: Aisle, Corridor or Ramp Width
  2012 EXISTING: The width of aisles or corridors (clear or unobstructed) serving as exit access shall be at least 4 feet and maintained to provide the convenient removal of non-ambulatory patients on stretchers, except as modified by 19.2.3.4, exceptions 1-5.

- 19.2.3.4, 19.2.3.5
  2012 NEW: The width of aisles or corridors (clear and unobstructed) serving as exit access in hospitals and nursing homes shall be at least 8 feet. In limited care facility and psychiatric hospitals, width of aisles or corridors shall be at least 6 feet, except as modified by the 18.2.3.4 or 18.2.3.5 exceptions.

- 18.2.3.4, 18.2.3.5
  This is commonly cited and is hard to manage because of all of the external factors that seem out of the facilities team control. However, technology can help solve this problem.

With the changes in compliance codes for fire safety, it's important to stay current with standards that could be overlooked, as well as Interim Life Safety Measures (ILSM).

How do you more efficiently manage fire and life safety with technology?

Stay up to date on the CMS K-Tag requirements

- Tech Tie-In: Keep up with K-Tag requirements by linking your facility assets, preventative maintenance and work orders to K-Tags.

Infographic

Learn more about the top 10 K-Tag citations

See more

Perform mock surveys and inspections to get ready

- Tech Tie-In: Test out your fire and life safety compliance by undergoing mock surveys and inspections around related assets and procedures. A CMMS can allow you to do this within a mobile system that documents every result.

Webinar

View our What to Know When it Comes to CMS K-Tag Compliance on-demand webinar

Watch now

Track smarter with mobile

- Tech Tie-In: Using a mobile device, you can track your inspections, take photos and start a work order if necessary.

See an example of a Fire Safety Survey Report

See more

Why is fire and life safety compliance so important?

Other than the importance of being prepared if an emergency (like a fire or safety issue) occurs, fire and life safety compliance is mandatory for CMS compliance. In fact, repercussions in all areas of compliance can equal fines, lack of reimbursements or facilities being shut down in extreme cases.

Fire and life safety is just another area that directly connects to protecting patient health and safety, and a place where technology can help you stay in control of growing demands.

> "If you open a work order for any of your life safety inventory such as penetrations, doors or emergency lighting, trigger a work order that causes the hospital to do an Interim Life Safety Measure (ILSM). If possible, stop any work from proceeding until that ILSM is complete and on file."

Dennis Smith
Senior Consultant, MSL Healthcare Partners

3. Medical gas and vacuum systems

Medical gas and vacuum systems are critical components to patient care and safety.

"Reliable medical gas and vacuum systems are at the pinnacle of patient care and provide critical sources of life-supporting gases that are required for proper treatment of patients in critical care areas of the hospital," according to an article in Health Facilities Management.[8]

"The ongoing operation and maintenance of these systems for existing facilities is vital to ensuring that they remain safe and dependable for patients who rely on them for survival."[8]

Within medical gas and vacuum systems, there are several key areas to focus on, including:[9]

1. Systems have to be categorized into the four risk categories identified in NFPA 99 (2012) and referenced in EC.02.05.09

2. Storage requirements

3. Labeling

4. Signage

5. Policy and procedure for handling gases with specific task required

How do you more efficiently manage medical gas and vacuum systems with technology?

This is another part of healthcare operations that is not a "set it and forget it" situation. Compliance and patient safety depend upon the ongoing monitoring and regular maintenance of these types of systems.

Here's how you accomplish this without stretching you or your team too thin:

Monitor CMS standards outlined in the 2012 edition of NFPA 99 (SECTIONS 5.1.2-5.1.15)

- Tech Tie-In: Use recurring tasks, automated PM work orders and digital record-keeping to simplify tracking work around managing medical gas and vacuum systems, as well as inventorying them.

Provide proper training for all staff and give them tools to stay compliant

- Tech Tie-In: Use a mobile work management system that can connect compliance codes with specific work orders to make it easier for your staff to do their work (and for management to track it easily). These systems can also allow you to do mock audits for equipment and processes around medical gas systems.

> **"**
> "Make sure testing parameters are included in the PM. It is important for the technician to understand why they are testing the equipment, what they are testing for, and the outcome the equipment needs to meet."
> **"**

William Gruber
Senior Director Facilities Operations,
Geisinger Health

Why is medical gas and vacuum systems compliance so important?

By their nature, these systems can mean life or death for those using them. With that in mind, every step your team takes to check connections, store them properly and manage day-to-day performance means you're protecting the lives of the patients you serve.

When technology like mobile devices and operations management software are a part of your processes, you can feel confident knowing what you did, where and when, and the effect it had on your entire operations.

4. Utility systems maintenance

Utility systems at your HCO may often be a source of contention, from the cost to repair them, the cost to replace them and how much maintenance they need along the way. And it's not just about keeping things running — it's about maintaining these critical assets so they can help your organization deliver an optimal patient experience.

According to an article in the September 2017 issue of The Joint Commission Perspectives newsletter, two of the top 10 citations for hospitals are related to utility systems:[7]

EC.02.05.01: The hospital manages risks associated with its utility systems. It has always been required that high-risk utility systems are properly labeled, but with the 2012 update to EP8, it more clearly defines how utility systems should be labeled, and that shut off valves and breakers are only accessible to authorized personnel.

EC.02.05.05: The hospital inspects, tests and maintains utility systems. The major changes are EP4 - EP6, as they more clearly define testing, maintaining and inspecting of utility systems. For high-risk utilities and alternate equipment (AE), the testing, maintenance and inspections must be completed at 100%. This also applies to infection control systems. In addition, the 100% completion rate is now also required for non-high risk equipment.

How do you more efficiently manage utility systems maintenance with technology?

Technology gives you the power to multiply your efforts around utility systems maintenance, making the work and reporting easier and more thorough.the patients you serve.

Track and document maintenance for better decision-making

- Tech Tie-In: Use a CMMS to monitor all maintenance, testing and inspections of your utility systems, including PM tasks, then have the ability to report on the health of your systems and make decisions with data about repairing vs. replacing. A maintenance system can also help improve your air balancing processes.

Improve you EOC rounding around utility systems and other assets

- Tech Tie-In: Use built-in EOC rounding tools on your mobile device to organize how to inspect, document and report asset health.

Monitor codes around utility systems (EC.02.05.01)[10] and air quality (Ashrae standard 170-2013)[11]

- Tech Tie-In: Connect-related codes to specific assets and work tasks and use those to create quick reports for compliance inspections.

Why is utility system maintenance and compliance so important?

The maintenance, testing and inspection of your utility systems is now very clearly defined and being monitored closely, and there is no room for error if you are to meet today's codes and standards. Tracking and reporting for these systems is critically important.

5. Emergency preparedness

Healthcare organizations really don't have the liberty of waiting until a natural disaster or emergency strikes to get their processes in order. And with the recent natural disasters across the country, this fact has become even more true.

With the new CMS emergency preparedness standards, the Federal Register's final rule Emergency Preparedness (EP) Requirements for Medicare and Medicaid Participating Providers and Suppliers recently went into effect (as of November 15, 2017) in an effort "to establish national emergency preparedness requirements to ensure adequate planning for both natural and man-made disasters, and coordination with federal, state, tribal, regional and local emergency preparedness systems."[12]

What is important for operations to know about emergency preparedness?

1. **New EPS have been created that address the following areas**

- Continuity of operations and succession plans

- Documentation of collaboration with local, tribal, regional, state and federal EM officials

- Contact information on volunteers and tribal groups

- Annual training of all new/existing staff, contractors and volunteers

- Integrated health care systems

- Transplant hospitals

2. **Subsistence needs for staff and patients — ensure policies and procedures address:**

- Subsistence needs including food, water and pharma supplies for patients and staff

- Temperature regulation to ensure patient safety and sanitary storage of provisions

- Emergency lighting, fire detection, extinguishing and alarm systems

- Disposal of sewage and waste

3. **Training program — provide facility's initial EP training and annual EP offerings**

- Staff must be able to demonstrate knowledge of emergency procedures

- Must be ready to show staff training files to verify that staff have received initial and annual EP training

4. **Emergency and standby power systems**

- Illustrate that facility has required emergency and standby systems to meet requirements of the EPP (Emergency Power Plan)

- Illustrate that facility has an EPP for "shelter in place" and evacuation operations

- Illustrate proper placement of EPSS (Emergency Power Supply Source) in new construction or alteration/renovation of existing EPSS

- Demonstrate that on-site fuel source meets NFPA 110

"

"If there is not adequate emergency power to operate the entire facility during a power outage, then there should be a plan to shed loads to ensure that temperature, humidity and air changes are maintained in critical and patient care areas."

"

Dennis Smith
Senior Consultant, MSL Healthcare Partners

How do you more efficiently manage emergency prep with technology?

There's no time to lose getting your emergency and disaster preparedness pieces in order, which makes it all the better to use technology to record and monitor related processes to make everyone's job easier.

Meet your specific requirements from the final rule standard

- Tech Tie-In: Digitize and store plans and procedures, so you can communicate more clearly and be one tap or click away from what you and your staff need in the case of an emergency. Know what to test and when with automated preventive maintenance tasks and emergency-related work orders.

This eliminates the need to look for a binder or try to remember procedures. There is even emergency management technology available that will store different emergency scenarios that can be applied should the need arise.

See what emergency prep is required based on your provider type

Train for and test your preparedness

- Tech Tie-In: Utilize tools for mock surveys and inspections to ensure your team is trained and ready to face an emergency situation.

Why is emergency preparedness compliance so important?

Instead of just waiting and hoping an emergency situation doesn't happen, you have to be prepared, have a plan and ensure others are confident in the part they play. Instead of relying on stacks of binders and papers, use mobile technology to make your compliance-required emergency protocols accessible and actionable.

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"We can also use our notification system to alert the customer of scheduled PMs like when we are testing our generators. Since we began using the notification feature of our CMMS, we no longerget calls about the lights flashing, etc. during generator testing."

"

William Gruber
Senior Director Facilities Operations,
Geisinger Health

Get CMS templates and checklists for emergency prep
Read more

Podcast
Listen to our podcast for tips on emergency preparedness
Listen to more

Chapter 3

Technology can mean the difference
between life and death

Compliance readiness has always been a priority and continuous
regulatory compliance has become a major focus for regulatory
agencies. Because of this, more time, which you don't have, is
focused on tracking compliance.

However, we also know that it's these time-consuming tasks that keep our patients and staff healthy, and community thriving. Changing an air filter, testing a utility system or going over an emergency protocol for the fifth time may seem pointless, but it's these tasks that can make a life or death difference – and they illustrate the ever-growing and foundational role that operations teams have in their workplaces.

Leveraging technology, such as a computerized maintenance management system (CMMS), is an invaluable tool for regulatory compliance. Compliance technology is like your utility system, it needs to be managed.

As an operations management platform, TheWorxHub™ is a user-friendly catalyst for hundreds of hospitals and other healthcare organizations to stay compliant while increasing their efficiency. User-friendly tools for EOC rounding and tracking compliance needs makes regulatory inspections more organized for demonstrating compliance.

When you can track, monitor and record everyday work, that living data creates a way to maximize resources and feel empowered to make decisions that improve both compliance and care.

Technology creates a bridge from the frustrating to the feasible, the questionable to the trackable, chaos to confidence.

"

"I don't think we did a really good job in the past attaching assets to work orders so we could track that back. In my mind, that's one of the most important things about a CMMS system – that you are able to track back to that asset and see its history since you're basing a lot of your decisions on that."

"As we've started to utilize TheWorxHub, we're seeing that it really is tailored toward hospitals. After using it, you can see how it really helps to keep you organized and on track to be compliant."

"

Jason Kohlbeck
Director of Facilities and Clinics, Aspirus Wausau Hospital

Read more

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About Brightly Software

Brightly, the global leader in intelligent asset management solutions, enables organizations to transform the performance of their assets. Brightly's sophisticated cloud-based platform leverages more than 20 years of data to deliver predictive insights that help users through the key phases of the entire asset lifecycle. More than 12,000 clients of every size worldwide depend on Brightly's complete suite of intuitive software – including CMMS, EAM, Strategic Asset Management, IoT Remote Monitoring, Sustainability and Community Engagement. Paired with award-winning training, support and consulting services, Brightly helps light the way to a bright future with smarter assets and sustainable communities. For more information, visit brightlysoftware.com