Welcome

Preparing for HRSA Operational Site Visits

Thursday, July 31, 2014

We will begin promptly at (2pm EST)

Event Host
Juli Hishida
National Health Care for the Homeless Council

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Preparing for HRSA Operational Site Visits

July 31, 2014
Presenters

Jennifer Metzler, MPH
Executive Director
Albuquerque Health Care for the Homeless
New Mexico

Nilesh Kalyanaraman, MD, FACP
Chief Medical Officer
Health Care for the Homeless
Baltimore, Maryland

Fran Pruce, MBA
Chief Operating and Financial Officer
Health Care for the Homeless
Baltimore, Maryland
Preparing for HRSA Operational Site Visits: The Albuquerque Experience

July 31, 2014
Jennifer L. Metzler, MPH, Executive Director
OSV Reference: Key Documents

19 Health Center Program Requirements
http://bphc.hrsa.gov/about/requirements/index.html

January 2014 Health Center Program Site Visit Guide
http://bphc.hrsa.gov/policiesregulations/centerguide.html

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How to Prepare

- Take it seriously.
- Months ahead, don’t wait.
- Form a team and work schedule.
- Identify a project lead to move preparation.
- Know your Project Officer and the Site Visit Team, request HCH experience.
- Study the key documents and relevant Policy Information Notices, Program Assistance Letters, other HRSA policy documents.
- Examine your team’s attitude, be open, be on the same page.
- Focus your Board of Directors.

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Keep a pace, crank it out

- Assess where you are on the 19 Requirements and prioritize the work, be honest with your assessment.
- Mets/Unmets (100% or not)
  - Just do the busy work.
  - Have a plan if you can’t possibly get there.
  - Know where you go to the mat.
- **Know the asterisks.**
- Prepare to be over prepared.
- Use technical assistance:
  - National HCH Council
  - HRSA website, policy and sample documents
  - NACHC & state PCA
  - Peers, local CHCs & HCH projects across the country
- Include entire organization, all in, all understand the importance of getting ready.

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For project management and preparation for your team, and to make things easy for the site visit team, create:

- Lists, checklists
- Crosswalks
- Guides
- Binders for review and binders for reference for your team
- Thumb drives
- Briefing memos, matrices, summaries
- A great entry conference presentation/overview
- Staged work space
- Adapted Site Visit Guide as map to document locations, management contact by area, etc.

- Work with your Project Officer as you’re preparing.
- Send the Site Visit Team what they ask for ahead of time.
- Be available the entire time they’re on site.
- Show your best, teach HCH.

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NEED
Have a written document that is current and board-approved.

SERVICES
- Know approved Scope of Project as current in EHB.
- Demonstrate board & management oversight and approval.
- Point to documentation in policies, procedures, signage, phone messages (after hours coverage), MOUs, minutes, contracts/agreements etc. that are current and specific.

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MANAGEMENT & FINANCE

- Particularly important to know your UDS and roll-up (comparative) analysis.
- This is where HCH projects have some of the greatest challenges (e.g., sliding fee, billing and collections, Medicare).
- Know the relevant PINs and know the asterisks.
- Demonstrate your plan for addressing requirements and getting up-to-speed in the new context of the ACA.

GOVERNANCE

Know the newest Governance PIN and know the asterisks.

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A Few Definite Things to Have

Written, and Board Approved, with evidence of Board involvement and oversight:

- Needs Assessment
- Strategic Plan and Process
- QA/QI Plan
- Credentialing policy and process
- Compliance Plan
- Emergency Preparedness Plan
- Compliant Bylaws
- Conflict of Interest Policy
- Executive Director/CEO Succession Plan

Albuquerque Health Care for the Homeless, Inc.
Contact
Jenny Metzler
505-767-1184
jennymetzler@abqhch.org
www.abqhch.org
Albuquerque, NM

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Preparing for Your HRSA Operational Site Visit – Clinical Performance Measures and Services

July 31, 2014
Quality Improvement/Assurance Plan (#8)

- Assemble your QI materials by year
  - QI Plan
  - Meeting minutes
  - QI projects
  - Description of QI methodology (PDSA, Lean, etc.)

- Peer Review
  - Written policy with overview of process
  - Peer review files available for review

- Confidentiality
  - Written policy for HIPAA compliance

- UDS Changes
  - Plan for incorporating new changes
Clinical Performance Measures

- Review of 2 clinical measures that you select
- Should be ones you already have a QI plan for
- HRSA website only goes up 2012 UDS data so have your 2013 data also available for them
- Discuss in the context of your QI Plan
Chart Review

- Have a list of 10 charts to review for each service you provide
- Give read only EMR access or have the charts pulled
- Only provide them with charts for services they ask for
Required and Additional Services (#2)

- Contracts with insurers
- Agreements with providers or organizations for charity care
- Referral tracking process including return of information
- Are there different procedures at different sites (as applicable)
Staffing (#3)

- HR Director
- Complete files with up to date information in one location
Accessible Hours (#4)

- How have the hours of service, including after hours, been determined?
- How are hours communicated to clients?
After Hours Coverage (#5)

- What is your mechanism for after hours coverage?
- How are you ensuring that your patients know how to get in touch with you after hours?
- Ensure that your message encourages patients to contact you unless it’s an emergency.
- If you have contracted for after hours coverage have the agreement and know how you are providing oversight.
Hospital Admitting Privileges and Continuum of Care (#6)

- How are patients hospitalized?
  - Direct admit by your staff
  - Direct admit to hospital staff
  - Referral to ER

- Do you have written hospitalization policies?
  - Admitting privileges for staff
  - Admitting arrangement with a group
  - Referral agreement with a hospital

- What are your written policies for tracking this transition?
  - Discharge follow up appointment
  - Results of ER/Hospital visit
  - Follow up on outstanding labs
Sliding Fee Scale (#7)

- Up to date policy on sliding fee scale
- Prominently posted
- HCH projects can have their fee scale slide to $0
Tips

- Style matters
- CMO ‘shadows’ the reviewer
- Key personnel available at all times
- Written policies and procedures: the more the better
- Know your reviewer: do research
- They hit hard up front
Preparing for Your HRSA Operational Site Visit – Management and Finance Program Requirements

July 31, 2014
Section 1. Need
PR #1 – Needs Assessment

Section 2. Services
PR #2 – Required and Additional Services
PR #3 – Staffing
PR #4 – Accessible Hours of Operation/Location
PR #5 – After Hours Coverage
PR #6 – Hospital Admitting Privileges and Continuum of Care
PR #7 – Sliding Fee Discounts
PR #8 – Quality Improvement/Assurance Plan

Section 3. Management and Finance
PR #9 – Key Management Staff
PR #10 – Contractual/Affiliation Agreements
PR #11 – Collaborative Agreements
PR #12 – Financial Management and Control Policies
PR #13 – Billing and Collections
PR #14 – Budget
PR #15 – Program Data Reporting Systems
PR #16 – Scope of Project

Section 4. Governance
PR #17 – Board Authority
PR #18 – Board Composition
PR #19 – Conflict of Interest Policy

Section 5. Clinical and Financial Performance

Section 6. Capital and Other Grant Progress Review

Section 7. Innovative/Best Practices
Documents Sent In Advance on Key Drives

- Most Recent Notice of Grant Award
- Needs Assessment
- Corporate Bylaws
- Board Minutes Recent 12 months
- Strategic Plan
- **Board Financial Reports**
- Board Committees and Meeting Schedule
- Current Board Roster
- Organizational Chart
- **Billing, Accounts Receivable and Collection Policies**
- Sliding Fee Schedule and Policy and Procedure
- Monthly and Most Current YTD Budget Variance Report
- 2 Most Recent Financial Audit Reports Incl Management Letters
- MIS Policies and Procedures
- Uniform Data System (UDS) Report Most Recent Three Years
On-Site Documents: Administrative/Governance

- SubGrantee Partnerships and Relationships
- Corporate Policies
- Key Administrative and Management Job Descriptions
- Key Administrative and Management Resumes
- Marketing Materials
- Recent BPHC Funding Proposal
- Credentialing Policy
- HRSA Program Specific Forms – Recent Form 5a, b, c
- Front Desk Policy
- Organizational Chart
- Staffing List by FTE
- List of Memorandum of Understandings
- Outreach Plan and Activities
- Personnel Policies Handbook
- Service Area Maps
- Recent UDS Report
- UDS Trend Report
On–Site Documents: Clinical and Financial

**Clinical**
- Recent Competitive Renewal Grant
- Procedure for Clinical Care
- Schedules
- Health Care Plan
- Hospital Service Agreement
- Recent UDS Trend Report

**Financial**
- Board Financial Reports for last 6 months
- Financial Minutes with Financial Reports for last 6 months
- Financial Audit Reports for last 2 years
- Productivity Report by Provider Specialty
- FQHC Rate Letters for last 2 years
- Latest Encounter Data
- Chart of Accounts
- Drawdown Schedule
- Form 1A from recent BPR Application
- HRSA Financial Performance Measures
Reviewer topics discussed during site visit interviews
Monthly Financial Statement Package

Provided to the Board every month for review

- Comparative Balance Sheet
- Income Statement showing variances to Budget
- Encounter report activity
- Provider activity
- Cash flow, either projection or analysis
- Reasonable levels of AP, AR, and Cash

The Reviewers were very curious about the information we gather, how we internally interpret it, and how we share it with various groups within the organization.
During the visit, although these were provided in advance, the Reviewers asked Management for verbal walk-throughs of several procedures.

- Segregation of duties on disbursements; documented signatory policies.
- Specific procedures on Medical Billing, Patient Receivables, and Denial Management.
- Board Approved!
A-133 Audit and Knowledge

The site auditors inquired about our A-133 knowledge and asked several questions, similar to those asked during the A-133 piece of the Financial Audit.

- Clean opinion on A-133 (preferred)
- Staff demonstrate working knowledge of A-133 requirements:
  - Allowable vs. Non Allowable
  - Cash Management
  - Proper documentation on payroll timesheets
- Capital purchases made with Federal funding, if any
- Will request to interview staff
Board Authority

It is incredibly important that Board minutes reflect the discussion and approval of various topics. Simply having processes is not enough; the Board must approve.

- Hold monthly meetings, every month regardless
- Approval of Budget (operating and capital)
- Selection and evaluation of CEO
- Services and hours
- Measuring and evaluating organization through financial goals and long range viability
- Sliding Fee Schedules and various rate structures (for example, PPS rates)
Other Management Topics

Various other matters came up in discussion with the reviewers:

- Updated Bylaws are HRSA PIN-compliant
- Current agreements with sub-recipients have supported written and signed contracts
- The Five Year Strategic Plan has written progress reports
- A capital budget is developed and board approved
- Term limits for Board members are established
- Conflict of Interest Policies are signed annually
10. Start early, form the team, and identify an administrative “quarterback.”

9. Identify and prioritize your vulnerabilities.

8. Implement a strategy for fixable areas and factor in lead time.

7. Document a plan for the more complex areas and show progress.

6. If the process is sound, an incomplete or imperfect outcome is ok.
Top 10 Tips Continued

5. Scavenger hunts, creative writing, and documenting what you do may be all that is needed.

4. Make sure your Board is meeting EVERY month and that the minutes reflect Board approval of policies, hours, etc.

3. Having a good relationship with your Project Officer can be helpful.

2. Never underestimate the value of the “Shiny Penny Syndrome” and help your reviewers experience how and why we really are different.

1. Keep your sense of humor. Don’t lose sight of your mission and the enormous good your folks do each day. Keep it all in perspective. Make sure you LAUGH before, during, and after the OSV… then carry on.
Questions and Answers

**Jennifer Metzler, MPH**
Executive Director
Albuquerque Health Care for the Homeless
New Mexico

**Nilesh Kalyanaraman, MD, FACP**
Chief Medical Officer
Health Care for the Homeless
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Resources

- January 2014 Health Center Program Site Visit Guide
  - [http://bphc.hrsa.gov/policiesregulations/centerguide.html](http://bphc.hrsa.gov/policiesregulations/centerguide.html)

- 19 Health Center Program Requirement
  - [http://bphc.hrsa.gov/about/requirements/index.html](http://bphc.hrsa.gov/about/requirements/index.html)

- Ten Tips for Clinical Operational Reviews (Webinar by Migrant Clinician’s Network)

- New Governance PIN
Thank you for your participation.

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