

Peer Lessons Learned from the HRSA Operational Assessment Process

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Michigan Primary Care Association
www.mpca.net



Session Badges

For HRSA
Site Visit
Veterans

For Those Who
Have Not Had
the Pleasure Yet...

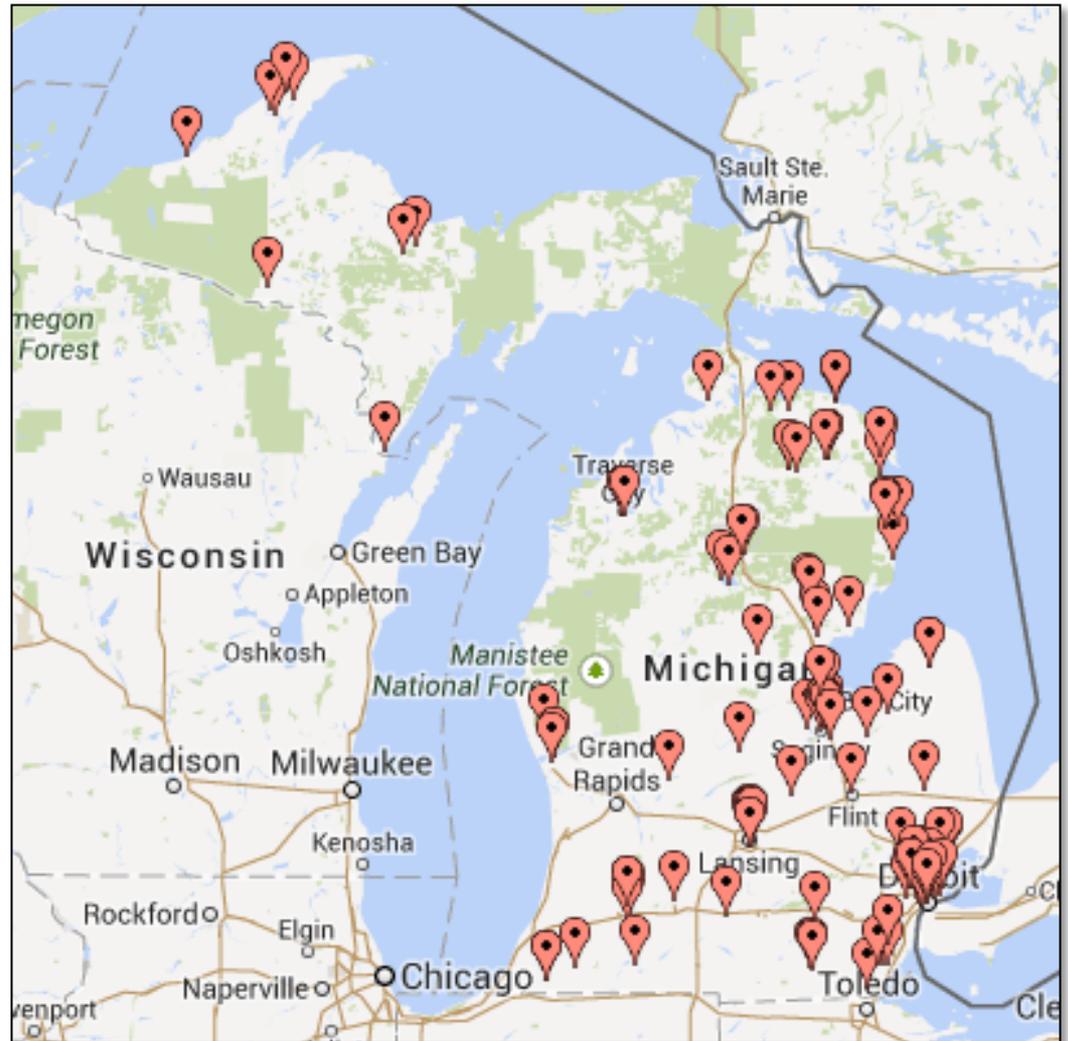
- Take a look around and identify colleagues that may be helpful as you prepare for and respond to current and upcoming visits
- We're all in this together...

HRSA Site Visit in Michigan

- Over 70% of Michigan's Health Centers will have completed a site visit by the end of this year
 - 2012- 4 OSVs
 - 2013- 10 OSVs
 - 2014- 13 OSVs + 1 New Look-Alike Visit & 2 TA Visits

HRSA Site Visits in Michigan

- 2012, 2013 and 2014 (complete and upcoming) Michigan site visits have brought HRSA staff and reviewers to all corners of the state



Program Conditions Analysis

- 805 program conditions are currently present in the national HRSA database
 - 71% are active and 29% have been met
 - 11% are 120 day status
 - 82% are 90 day status
 - 6% are 60 day status
 - <1% are 30 day status
- Most Centers with a program condition have more than one...
 - 276 unique organizations with conditions vs. 805 total conditions

Program Conditions Analysis

Condition	% of All Conditions
R.2.4 Sliding Fee Discount Program	10.5%
R.7.1 Board Authority	9.7%
R.2.3 Required or Additional Services	8.0%
R.5.3 Credentialing and Privileging Policies, Procedures and Documentation	7.0%
R.2.5 Quality Improvement/Quality Assurance Program	5.8%
R.6.2 Maintaining Accurate Scope of Project	5.8%
R.6.1 Revised Budget	5.7%
R.5.5 Billing and Collections Policies and Procedures	5.1%
R.4.1 Arrangements for Hospital Admitting and Continuity of Care	4.3%
R.7.2 Conflict of Interest Provisions	4.1%
R.6.2 Implementation of Approved NAP Site (NAP ONLY)	3.2%
R.5.4 Corrective Actions to Address Audit Findings	2.9%
R.5.4 Financial Management and Control Policies (Non-Audit Related)	2.9%
R.5.2 Fully Staffed Key Management Team	2.4%
R.6.2 Maintaining Approved Scope of Project Patient Levels	2.4%

Site Visit Findings in Michigan

- Michigan Health Center site visit findings largely match the most common national conditions
- However, in Michigan the order of most frequently “not met” program requirements is slightly different
 - Board Authority
 - Financial Management and Control Policies
 - Billing and Collections
 - Budget
 - Program Data Reporting Systems
 - Hospital Admitting / Continuum of Care
 - Key Management Staff

Site Visit Observations

1. Early Preparation
2. Policy, Policy, Policy
3. Reality vs. What is Documented
4. Engaged Governance

Key Site Visit Observations

Early Preparation

- Preparing for a site visit takes time...
 - Time for management to get organized and identify weaknesses
 - Time for key personnel to work through corrective strategies
 - Time for staff to become familiar with the process
 - Time for the Board to review and approve new and updated policies
- Starting to prepare for your site four (or more) months in advance can greatly increase your level of compliance

Early Preparation

- Get everyone who “touches” compliance with program requirements together
- Review the site visit guide as a group
- Make assignments for detailed review of current policy, procedure and practice
 - Assignees should re-read the applicable HRSA PINS and PALs in addition to looking at policy/procedure alternatives
- Come back together as a group to report out potential weaknesses
- Develop a corrective plan and appoint a czar to make sure tasks are completed on time

Key Site Visit Observations

Policy, Policy, Policy

- Most Centers experience unmet program requirements as a result of policy inadequacies
 - Some policies may not address HRSA requirements in their entirety
 - Some are outdated and/or based on past practice
 - Some have not been reviewed/approved by the Board in recent history
- A Center cannot succeed in the site visit process without strong policy, the preponderance of HRSA's review is based on policy documents

Policy, Policy, Policy

- Creating a consistent, ongoing policy review calendar helps position Centers for success and it makes preparing for subsequent visits quicker and easier
 - Create and/or review a list of common policies and board actions
 - Edit the list to fit your organization
 - Assign a small group of the review/action tasks to each month of the year to routinize review and approval processes

Key Site Visit Observations

Reality vs. What is Documented

- Beyond policy inadequacies, inconsistency between documented practice and reality is another common source of compliance trouble
 - Most of the time, this challenge occurs because everyone involved is busy and...
 1. Documents haven't kept pace with practical changes and developments
 2. Turnover has diminished institutional memory and awareness

Reality vs. What is Documented

- Conducting a series of small, targeted internal audits is an effective way to identify discrepancies and correct them before reviewers arrive
- Examples include:
 - Reviewing a small group of credentialing files
 - Are the files comprehensive and current according to PIN 2002-22?
 - Observing how staff implement the sliding fee policy
 - Did staff correctly collect and verify information for sliding fee eligibility?
 - Following a small number of patients through transitions in the environment of care
 - Were your tracking and referral policies followed carefully? Were they effective?
 - Interacting with your after hours coverage service
 - Could a LEP patient meaningfully access a provider? How did the provider document the interaction?
 - Conducting a review of a current contract for services
 - Are your board-approved policies for contract oversight being followed?

Key Site Visit Observations

Engaged Governance

- Health Center boards play a critical (and mandatory) role in review and approval of the policies and actions HRSA review consultants rely on to assess compliance
 - Patient/community control is a central tenant of the Health Center program and reviewers look for engaged governance

Engaged Governance

- Board participation in the site visit process is welcome and encouraged
- Beyond the specific board meeting with HRSA review consultants, board members often attend the entrance and exit conferences
- Robust board participation during the site visit reflects very positively on Health Centers

Site Visit Veterans

Share Your Thoughts!

- What were you most worried or anxious about before your HRSA site visit?
- What's the most important thing you learned about the site visit process?
- Did any portion(s) of the site process disappoint you or not meet your expectations?
- Knowing what you know now, what do you wish you knew before your site visit?
- How did preparing for, conducting and remediating (if applicable) the site visit process impact your organization's operations?

Site Visit Novices

Utilize the Expertise Around You!

- What are you most worried or anxious about as you prepare for your HRSA site visit?
- What unanswered questions do you have about the site visit process?
- How are you preparing your organization (policies, staff, management, board etc.) for the HRSA site visit?

MPCA Site Visit Assistance

- MPCA can help your Center prepare for and remediate HRSA site visits
- MPCA offers a wide range of site visit assistance including:
 - Introductory Webinars
 - On-Site Preparatory Sessions
 - Board and/or Staff Meetings
 - Site Visit Guide Clarification
 - Site Visit Follow-Up TA
- Ask any member of the site visit team for help- Becky, Phillip, Andrea, Ryan, Brittany, Wendy or Lynda

Questions?

For more information, please contact:

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