Operational Site Visits
Strategies for Success from the
HRSA & Health Center Perspectives
NACHC Policy and Issues Forum

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Ernia Hughes, Director, Office of Northern Health Services
Angela R. Powell, Director, Office of Southern Health Services
Bureau of Primary Health Care (BPHC)
Health Resources and Services Administration (HRSA)
Participants

Moderator
Angela R. Powell, Director
Office of Southern Health Services
BPHC, HRSA

Panelist
Ernia Hughes, Director
Office of Northern Health Services, BPHC, HRSA

Panelist
Glenda Walker
Director of Quality & Informatics
Cherry Health, Grand Rapids, MI

Panelist
Jennifer Genua-McDaniel, CEO
Genua Consulting, LLC
Session Overview

- Operational Site Visit (OSV) Overview & 2019 Updates
- Panel Discussion – Best Practices & Lessons Learned
- Poll Questions
- Participant Q&A
- Resources
Objectives

• Upon completing this session, participants will be able to:
  ▪ Identify best practices from HRSA staff to prepare your health center for a successful OSV
  ▪ Avoid common pitfalls that may lead to non-compliance determinations
  ▪ Learn innovative strategies and ideas from experienced health centers and reviewers that will help your organization take proactive measures to prepare for OSVs
  ▪ Identify technical assistance resources to address compliance challenges in preparation for OSVs
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Step 2: Choose a Session

Step 3: Respond to Polls when they appear
Poll #1: Your Location

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Health Center Program Operational Site Visit

Purpose and Overview

• Support HRSA’s oversight of the Health Center Program
• Provide an objective assessment and verification of a health center’s compliance with statutory and regulatory requirements of the Health Center Program
• Conducted at least once per project/designation period, generally 18 months into a typical three-year project/designation period
Legislative Background

• Health Center Program Compliance Manual & Updates (August 2018)
• Site Visit Protocol (January 2018)
• Bipartisan Budget Act of 2018 (February 2018)
  ▪ One active condition at time of Service Area Competition (SAC) award = one year project period
  ▪ 1, 1 and Done
2018/2019 Updates

• Onsite federal representative
• Compliance Resolution Opportunity (CRO)
• Diabetes performance measure/root cause analysis and follow-up strategy
Helpful Tip #1

It is crucial that health centers adequately prepare for an OSV.

The best strategy to be prepared for an OSV is to cultivate a culture of ongoing compliance at all levels of operations within the health center.
Panel Discussion Questions: Pre-Site Visit (1/4)
Panel Discussion Questions: Pre-Site Visit (2/4)

- Advanced preparation
- Board and staff involvement
- Pre-/Post-Compliance Manual and Site Visit Protocol
Panel Discussion Questions: Pre-Site Visit (3/4)

• Utilization of the Site Visit Protocol
• Other resources
• Issues encountered
Panel Discussion Questions: Pre-Site Visit (4/4)

• Tips and strategies for advanced preparation
• Proactive measures
• Changes in guidance on demonstration of compliance
Helpful Tip #2

Take the time to gather and prepare the documents listed on the Site Visit Protocol standardized list well in advance!

Follow the document naming convention and upload to a secure place accessible to all reviewers.

Missing documents may significantly impact compliance determinations.
Helpful Tip #3

Advance preparation for the onsite diabetes performance measure/root cause analysis is critical!

Review data in advance and engage as many people in your organization as you deem necessary to support this process.
Panel Discussion Questions: On-Site (1/4)
Panel Discussion Questions: On-Site (2/4)

• Knowledge level of consultants and federal representatives
• Interactions between OSV team and health center staff/board
• Tips and strategies for working effectively with OSV team
• Board engagement
• Onsite federal representative
• Diabetes performance measure/root cause analysis discussion
Panel Discussion Questions: On-Site (4/4)

• On-site utilization of the Site Visit Protocol and Compliance Manual
• Site Visit Protocol documents lists
• Common pitfalls to avoid
Helpful Tip #4

Elements of the Sliding Fee Discount Program and Board Authority are the most commonly cited Health Center Program requirements on OSVs.
Helpful Tip #5

The Compliance Manual chapters include sections that health centers should review related to compliance.

Requirements and Demonstrating Compliance sections of the Compliance Manual list the mandatory programmatic compliance determination information.

Requirements

- The health center must operate in a manner such that no patient shall be denied service due to an individual's inability to pay.
- The health center must prepare a schedule of fees or payments for the provision of its services consistent with locally prevailing rates or charges and designed to cover its reasonable costs of operation and must prepare a corresponding schedule of discounts [sliding fee discount schedule (SFDS)] to be applied to the payment of such fees or payments, by which discounts are adjusted on the basis of the patient's ability to pay.
- The health center must establish systems for [sliding fee] eligibility determination.
- The health center's schedule of discounts must provide for:
  - A full discount to individuals and families with annual incomes at or below those set forth in the most recent Federal Poverty Guidelines (FPG) [100% of the FPG], except that nominal charges for service may be collected from such individuals and families where imposition of such fees is consistent with project goals, and
  - No discount to individuals and families with annual incomes greater than twice those set forth in such Guidelines [200% of the FPG].

Demonstrating Compliance

A health center would demonstrate compliance with these requirements by fulfilling all of the following:
Panel Discussion Questions: Post-Site Visit (1/2)
Panel Discussion Questions: Post-Site Visit (2/2)

- Benefit of the OSV process
- OSV report timeliness and format
- Compliance Resolution Opportunity (CRO)
- Diabetes performance measure action plan and follow up strategy
Helpful Tip #6

OSVs allow HRSA to assess program compliance of health centers. If a health center is not compliant, a condition of award will be generated and placed on the award.

Take advantage of the new CRO process as applicable to decrease the likelihood of non-compliance determinations.

Credentialing and privileging policies, and quality improvement and quality assurance have implications for delaying Federal Torts Claim Act (FTCA) coverage.
Wrap-up

• Your top three overall insights about the OSV process
Helpful Tip #7

HRSA staff makes the final determination regarding whether a health center meets programmatic compliance requirements after an OSV.
Helpful Tip #8

If a health center has not resolved all conditions on its award prior to submitting its SAC application:

- The next project period will be one year
- The health center will submit another SAC application within one year
- The health center will receive an OSV during the one year project period
Helpful Tip #9

Please take the time to fill out OSV evaluations.

Your feedback is critical to improve the process and overall success of the program.
Participant Q&A
Poll: Now that we have discussed the OSV process and available resources, which of the following best describes your level of concern in preparing to demonstrate 100% compliance on your next OSV?
Resources

- **HRSA BPHC Project Officer**: Address specific questions with your Project Officer who serves as your primary point of contact.

- **Site Visit Protocol**: [https://bphc.hrsa.gov/programrequirements/svprotocol.html](https://bphc.hrsa.gov/programrequirements/svprotocol.html)


- **Progressive Action Conditions Library**: [https://bphc.hrsa.gov/programrequirements/conditions-library.html](https://bphc.hrsa.gov/programrequirements/conditions-library.html)
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