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CONTINUITY OF CARE AND HOSPITAL ADMITTING

Primary Reviewer: Clinical Expert
Secondary Reviewer: N/A

Authority: Section 330(k)(3)(A) and 330(k)(3)(L) of the Public Health Service (PHS) Act; and 42 CFR 51.c.303(a) and 42 CFR 56.303(a)

Document Checklist for Health Center Staff

Documents Provided Prior to Site Visit:

☐ Health center’s internal operating procedures and/or documentation from arrangements with non-health center provider(s) for tracking of patient hospitalization and continuity of care

Documents Provided at the Start of the Site Visit:

☐ Documentation of EITHER:
  ◦ Provider hospital admitting privileges (for example, hospital staff membership, provider employee contracts) that address delivery of care in a hospital setting to health center patients by health center providers; OR
  ◦ Formal arrangements with provider(s) or entity(ies) that address health center patient hospital admissions

☐ Sample of 5–10 health center patient records (for example, using live navigation of the Electronic Health Records (EHR), screenshots from the EHR, or actual records if the records are not electronic/EHR records) who have been hospitalized or had Emergency Department (ED) visits within the past 12 months

Demonstrating Compliance

Element a: Documentation of Hospital Admitting Privileges or Arrangements

The health center has documentation of:

- Health center provider\(^1\) hospital admitting privileges (for example, provider employment contracts or other files indicate the provider(s) has admitting privileges at one or more hospitals); and/or

\(^1\) In addition to physicians, various provider types may have admitting privileges, if applicable, based on scope of practice in their state (for example, nurse practitioners, certified nurse midwives).
• Formal arrangements between the health center and one or more hospitals or entities (for example, hospitalists, obstetrics hospitalist practices) for the purposes of hospital admission of health center patients.

Site Visit Team Methodology

- Interview health center clinical leadership (for example, CMO, Clinical Director) on processes for ensuring continuity of care for patients that require inpatient hospitalization.
- Review documentation of EITHER:
  ◦ Provider hospital admitting privileges that address delivery of care in a hospital setting to health center patients by health center providers; OR
  ◦ Formal arrangements with non-health center provider(s) or entity(ies) (for example, hospitalists) that address hospital admissions of health center patients.

Site Visit Findings

1. Does the health center have:
   ◦ Documentation of hospital admitting privileges (if select health center providers assume responsibility for admitting and following hospitalized patients); and/or
   ◦ Formal arrangements with non-health center provider(s) or entity(ies) (such as a hospital, hospitalist group, or obstetrics practice) that address health center patient hospital admissions?
   ☐ YES ☐ NO

   If Yes OR No, an explanation is required specifying the health center’s arrangement(s) for hospital admissions:

Element b: Procedures for Hospitalized Patients

The health center has internal operating procedures and, if applicable, related provisions in its formal arrangements with non-health center provider(s) or entity(ies) that address the following areas for patients who are hospitalized as inpatients or who visit a hospital’s emergency department (ED):\(^2\)

• Receipt and recording of medical information related to the hospital or ED visit, such as discharge follow-up instructions and laboratory, radiology, or other results; and
• Follow-up actions by health center staff, when appropriate.

\(^2\) Health center patients may be admitted to a hospital setting through a variety of means (for example, a visit to the ED may lead to an inpatient hospital admission, or a health center patient may be directly admitted to a unit of the hospital, such as labor and delivery).
Site Visit Team Methodology

- Review health center internal operating procedures and/or documentation from arrangements with non-health center provider(s) or entity(ies) to assess continuity of care provisions.
- Interview health center staff regarding continuity of care.

Site Visit Findings

2. Did the health center’s internal operating procedures and/or arrangements with non-health center provider(s) or entity(ies), if applicable, address the following:

   ◦ How the health center will obtain or receive medical information related to patient hospital or ED visits and record such information (for example, discharge follow-up instructions and laboratory, radiology, or other results)?
     □ YES □ NO

   ◦ Follow-up by the health center staff, when appropriate?
     □ YES □ NO

   If No was selected for any of the above, an explanation is required:

Element c: Post-Hospitalization Tracking and Follow-up

The health center follows its operating procedures and formal arrangements as documented by:

- Receipt and recording of medical information related to the hospital or ED visit, such as discharge follow-up instructions and laboratory, radiology, or other results; and
- Evidence of follow-up actions taken by health center staff based on the information received, when appropriate.

Site Visit Team Methodology

- Have a health center clinical staff member navigate the reviewer through 5–10 health center patient records.
- Interview relevant health center staff regarding access to medical information related to hospital and ED visits and associated follow-up actions by health center staff.

Site Visit Findings

3. Based on the review of sampled records and interview, was there documentation of:

   ◦ Medical information related to the hospital or ED visit, such as discharge follow-up instructions and laboratory, radiology, or other results?
     □ YES □ NO
• Follow-up actions taken by health center staff based on the information received, when appropriate?
  ☐ YES ☐ NO

**Note:** For a health center that has had no patients who have been hospitalized in the past 12 months (for example, a newly-funded health center that has just started its operations), a review of operating procedures and results of the interview with health center staff can be used to respond to these questions.

If No was selected for any of the above, an explanation is required: