# Community Health Center and Academic Medical Center Residency Program Collaborations





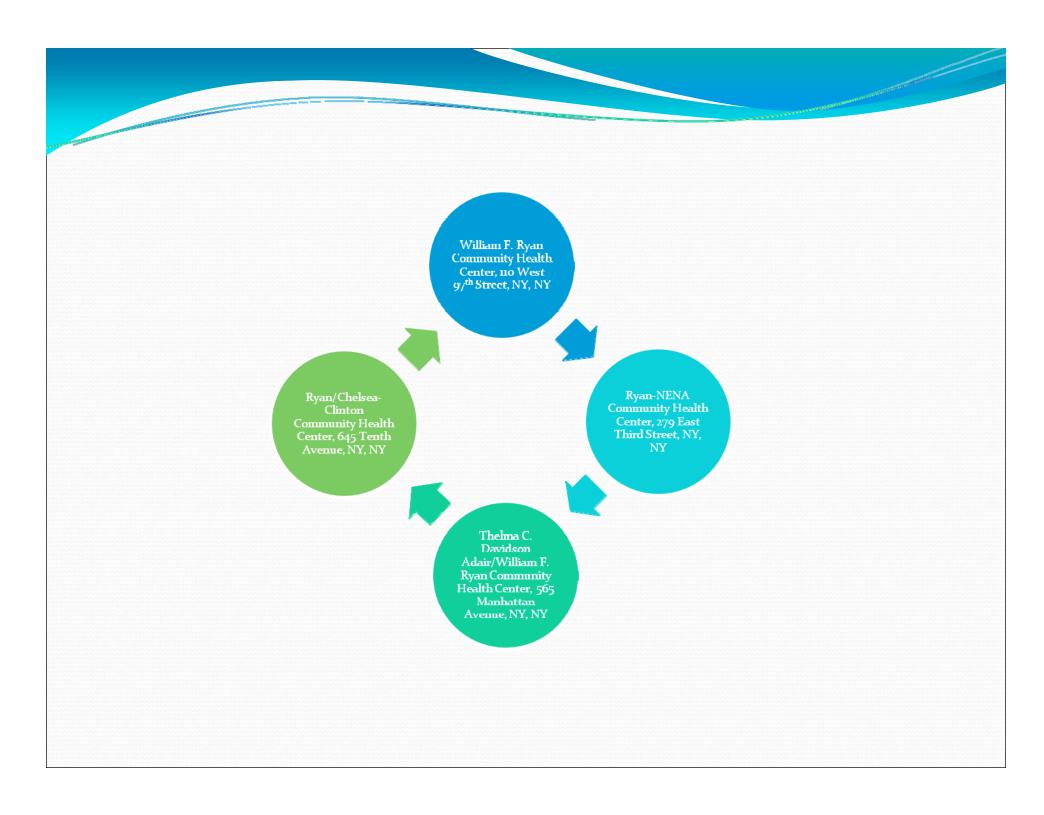
Karen Westervelt Andrew Gotlin, MD Charles Shorter, MSW Scott D. Morgan

#### **Session Objectives**

- Identify Benefits of Collaboration
- Understand Key Considerations
- Recognize the Importance of the Planning Process
- Lessons Learned
- Understand Billing Requirements
- Learn about Teaching Health Center Funding Opportunities

#### Who Are the Partners?

- William F. Ryan Community Health Network
- St. Luke's-Roosevelt Hospital Center
- Currently, the William F. Ryan Community Health Network consists of sixteen service sites with four main sites:



- The St. Luke's-Roosevelt Hospital Center is a 1,076bed, full service community and tertiary care hospital.
- The Hospital's academic partner is Columbia University College of Physicians and Surgeons.

#### The Partnership:

- Six Phases of Transaction
- 1. Ryan/Chelsea-Clinton CHC took over Roosevelt Hospital's Pediatric Outpatient Clinic '06
- 2. Ryan/Chelsea-Clinton CHC took over Roosevelt Hospital's Internal Medicine Outpatient Clinic (ambulatory rotation site for Internal Medicine residency program) '07
- 3. Thelma C. Davidson Adair Center became an Internal Medicine residency program rotation site for residents from St. Luke's Hospital '09
- 4. William F. Ryan CHC took over St. Luke's Hospital's Pediatric Outpatient Clinic -- '10
- 5. Ryan/Chelsea-Clinton CHC took over Roosevelt Hospital's Dermatology Outpatient Clinic (Dermatology rotation site) '10
- 6. William F. Ryan CHC taking over St. Luke's Hospital's Internal Medicine Outpatient (ambulatory rotation site for Internal Medicine residency program) Anticipated completion 1st 1/4 2011

#### **Key Considerations:**

- Does it make sense legally, financially and programmatically?
- Can you maintain and improve primary and preventive care delivery?
- Have you conducted comprehensive due diligence?

#### **Due Diligence Process:**

- Clearly understand scope of deal.
- Understand Hospital's respective outpatient clinic visit volume and payor mix.
- Determine number of residents & residency mix levels (PGY 1's, 2's, 3's).
- Determine number of residency session rotations.
- Determine what clinical and administrative interfaces will be required.
- Determine current organizational capacity and fully understand what expanded capacity will be required.

#### Financial Due Diligence:

- As a first step, <u>develop financial pro-formas</u> showing clinic/program performance under FQHC auspice (and potentially current clinic/program performance in order to identify net change. *Often this is hospital's/program's first look at clinic total performance.*)
- Pro-formas serve as objective basis for determination of Community Benefit Grant support as well as agreed-upon set of assumptions
  - Dependent upon reliable data from both partners
  - Transparency is critical

# Financial Due Diligence – Key Considerations

- Clearly define services to be included in arrangement
- Ensuring appropriate segregation between teaching and non-teaching expenses
  - GME rules require GME recipient to cover all or substantially all of training costs
  - FQHC grant and patient service revenue should not subsidize teaching expense
- Ensuring adequate coverage of FQHC costs
  - Health center needs to ensure equal access to all services
  - Enabling, ancillary, overhead costs

# Financial Due Diligence – Key Considerations

- Identification of annual operational expense as well as one-time, transition expenses
  - Conduct site visit to determine whether upgrades/enhancements are required
  - Work through how things will work operationally to determine financial implications (e.g. HR/personnel, IT/systems, etc.)
- Consider enhanced utilization of resources due to presence of residents

#### **Key Considerations:**

- Upon completion of due diligence and understanding the financial consequences of transaction – negotiate community benefit grant with Hospital to help offset portion of uncompensated costs (w/o restriction to patient's right to choose)
- What are the Employment Considerations (hiring of additional staff, re-location of staff, union considerations)

#### **Process**

- Creation of Term Sheet outlining preliminary understandings and key principles of transaction. Serves as basis for negotiation.
- Prepare confidentiality agreement relative to sharing of information between parties.
- Formation of Workgroups.
- Workplan and timeline developed for respective workgroups.
- Executive Committee reviews recommendations from Workgroups and codifies agreements in contractual documents.

#### **Lessons Learned**

- Overcoming organizational resistance of both partners
- Interfacing two clinical cultures
- Fiscal well-being of both partners
- Defining roles relative to supervision of Hospital staff on site at CHC
- Credentialing and Privileging
- Planning for new patient demographics
- Medical Records
- IT and IT systems interface
- Productivity meeting expectations of both partners.
- Patient Continuity

Culture Shift

- Who pays for the clinical staff?
  - Precepting Staff
    - Contracted employees from the hospital
    - Current FQHC staff in same discipline
    - Newly hired FQHC staff
  - FTCA implications
- Medical Students

- Know the stakeholders and decision makers, and make sure they are at the pre-affiliation discussion meetings
  - Residency Director
  - Clinical Leader of Precepting Staff
  - Role of the Chief Resident(s)
  - Nursing

- Regulations
  - Residency Regulations
  - FQHC Regulations
  - Crosswalk

- Discipline
  - Residents
  - Preceptors
  - What role does clinical leadership at the FQHC play regarding disciplinary action?
  - Termination of a resident or preceptor

- Insurance Credentialing
  - Precepting providers need to be on-par with your insurance plans and have the correct Locator ID
- Privileging
  - Preceptors and Residents need to be privileged to work at your FQHC, including all primary source verification
  - Hospital as a Credentialing Verification Organization (CVO)

- How many additional patients do you expect?
- How many exam rooms will you need?
- What about precepting rooms?
- Additional equipment
- Additional support staff, both clinical and administrative
- Any staff coming from hospital?
- Union issues

- Scheduling
  - Preceptors
  - Residents
  - Patients
    - Considerations: first few months of PGY-1 year
    - Various visit types
    - Time built in to precept
    - Productivity expectations
- Changes in Preceptor/Resident Schedules
- On-Call Schedule

- Practice Management
- Medical Documentation
- Medical Records from Hospital

Patient Continuity

#### Performance Improvement

- Involvement of residents and preceptors in FQHC's Performance Improvement (PI) activities
- PI activities underway at the hospital at time of affiliation
- Information Exchange

### Coding

- Provider education regarding compliant coding practices
- Acceptable E&M levels of coding
- Primary Care Exception Waiver

# Teaching Physician Primary Care Exception Rule Requirements

- Applies to lower and mid-level E/M services (99201-99203, 99211-99213 and G3044)
- Teaching Physician (TP) may not supervise more than four
  (4) learners, residents and students, at any given time
- Care must be directed from such proximity to constitute immediate availability
- No other responsibilities assigned at the time service was furnished by the resident
- Primary medical responsibility for patients cared by residents
- Ensure care furnished is reasonable and necessary

### E/M Services Documentation Guidelines

- Combined entries into the medical record by the TP and resident constitute the documentation for the service and together must support medical necessity.
- TP must document at minimum the extent of the teaching physician's participation in the review and direction of the services furnished to each patient.

### Billing Requirements

- Selection of the appropriate E/M service & ICD-9 supported by chart documentation
- TP NPI billing provider
- Visits with improper documentation do not qualify as a billable visit (i.e. chart only contains resident documentation of TP presence)

#### **Cautions:**

- Ask Is this transaction VALUE ADDED. Be prepared to walk away if it is not.
- Clearly understand why this is in the Center's and patients' best interests.
- Conduct your due diligence make sure to have good legal and financial counsel.
- Assure buy-in at all levels.



#### **Outcomes:**

- Since entering partnership we have expanded our capacity to serve patients.
- Improved patients' in our communities continuity of care.
- Expanded Network's mission to include teaching future primary care providers in a community health center setting. Enriched residents' medical education.
- Helped with physician recruitment.
- Improved payor mix.

# Q&A

