

Overview of HRSA's Compliance Strategy and Planning for CHC's 2019 Operational Site Visit

Meeting of the Carolina Health Centers Board of Directors

March 25, 2019



Two opportunities to demonstrate *full* compliance with HRSA regulations and program expectations

Operational
Site Visit
OSV

Conditions =
Opportunity for
Corrective Action

Grant
Application
SAC/BPR

Conditions = 1 year
Project Period
3X = not eligible for
funding

Tools to support full compliance and preparation for OSV

Health Center Program Compliance Manual

- Final Compliance manual was issued on August 20, 2017 and became effective immediately
- Separate chapters for each requirement
- Examples of how health centers can demonstrate compliance
- Supersedes many PINs/PALs BUT NOT
 - Scope of Project guidance
 - FTCA manual and deeming PALs
 - UDS
 - Service Area Overlap
 - Emergence management Expectations

Site Visit Protocol

- Fully aligned with the Health Center Program Compliance Manual – 93 elements
- For each chapter, the following are identified:
 - Statutory and regulatory authority
 - Primary and secondary reviewers
 - Document lists
 - Elements for demonstrating compliance
 - Individuals to be interviewed
 - Assessment methodology
 - Questions to determine findings

About the OSV

NEW: under new process, can no longer make minor revisions to policies and procedures while review team is on site –HRSA should provide 2-week “grace” period after OSV to make changes before findings are finalized, included in OSV report and imposed as conditions

- 3-day on site audit
 - Three reviewers (admin/governance, clinical, financial) who are consultants and acting as “authorized representatives of HRSA”
 - Project Officer or another person from HRSA Operations division will be on site
- Opening conference and closing conference
 - No findings announced at closing
- Compliance assessment based on the health center’s documentation
- Final reports issued by HRSA within 45 days
- Non-compliance will result in grant conditions
- Grant conditions must be addressed before next grant submission

The Board Interview



- Board members are invited to attend the entrance and exit conferences
- Usually there is a separate meeting with the Board
- Board members may be asked about:
 - The Board's role in assessing need and determining scope of services
 - How they assess the center's financial, operational, and clinical performance
 - The process for recruiting and onboarding new Board members
 - How the Board evaluates its own performance
 - What policies are brought to the Board for their approval
 - How the Board interacts with and evaluates management
- The best way to be prepared for the Board interview is to be familiar with the Compliance manual and Site Visit Protocol

CHC's OSV Prep Plan



- Senior team required reading list: Health Center Compliance Manual and Site Visit Protocol
- Compliance Manual and Site Visit Protocol to be loaded on Board portal
- Senior Team monthly meetings
- Divide and conquer
- Document box open for business
- Monthly updates at Board meetings
- Mock interview questions discussed at Board meetings