

Healthcare Compliance Forms and Tools

Sample Provider-Based Requirements Compliance Assessment Tool

By Samantha Karpenko

Department Name:	
Department Physical Address/Location (include suite #):	
Assessment Done By:	Date:
Proximity Designation: On-Campus _____ Off-Campus _____	

For the purpose of this assessment, the terms “provider-based” and “facility-based” are synonymous terms meaning a HOSPITAL department.

Department Information	
<i>List hospital names here for reference if necessary</i>	
This is the facility, hospital, and/or main hospital that the questions throughout the rest of this assessment refer to.	Consider: Is this the most logical hospital affiliation for this department based on location, etc.?
Facility this department is provider-based to (hospital name):	
Department hours of operation:	

Supervisor:		
Manager:		
Director:		
Admin/Executive director:		
Operational owner:		
Cost center(s):	Number	Name
Epic department number(s) with department name:		
Facility under which patients are registered:		
Physician supervision requirement met by (be as specific as possible):	(e.g., in-clinic physician, physician assistant, or advanced registered nurse practitioner; hospitalist; provider within same building; etc.)	

Notes

Checklist A: Requirements for Meeting Provider-Based Status—Use for All Locations (On-Campus and Off-Campus)

§ 413.65 Reference	Regulatory Requirement	Question	Y/N	Documentation/Notes	Met	Not Met
(d)(1)	1. Licensing/Credentialling	1. Is the site listed on the hospital's Department of Health application?				
		2. Is this site listed on the Medicare enrollment form CMS-855A?				
(d)(2)(i)	2. Clinical Services Integration	1. Is medical staff privileged at the main hospital?				
(d)(2)(ii)		2. Are monitoring and oversight of the department the same as for other hospital departments (e.g., executive leadership, information control, quality, etc.)?				
(d)(2)(iii)		3. Does the department's medical director have a reporting relationship to the chief medical officer of the main hospital?				
(d)(2)(iv)		4. Does the medical staff committee of the main hospital oversee the medical activities of the department?				
(d)(2)(v)		5. Do the medical records identify the patient as being a patient in the main hospital?				
(d)(2)(vi)		6. Do the clinic patients have access to the full range of services at the main hospital?				

§ 413.65 Reference	Regulatory Requirement	Question	Y/N	Documentation/Notes	Met	Not Met
(d)(3)	3. Financial Integration	1. Are departmental costs included on the hospital cost report?				
(d)(3)		2. Are the income and expenses of the department shared with the main hospital?				
(d)(3)		3. Is the department on the trial balance of the main hospital?				
<i>State Operations Manual § 2026A and Centers for Medicare & Medicaid Services (CMS) rulings not in manual form</i>	4. Building/Space Integration (Provide detailed information for each “Yes” answer in the Notes section)	1. Is the entrance to the department shared with any other department/clinic/service?				
		2. Does the department share waiting room space with any other department/clinic/service?				
		3. Does the department share office or front desk space with any other department/clinic/service at any time, day or night? If yes, provide detailed information in the Notes section.				
		4. Does the department share staff with any other department, including registration staff?				
(d)(4)	5. Public Awareness/How the Department Is Held Out to the Public as a Department of the Main Hospital	1. Does the department signage indicate the name of the hospital?				

§ 413.65 Reference	Regulatory Requirement	Question	Y/N	Documentation/Notes	Met	Not Met
(d)(4)		2. Take a photo of the clinic sign(s), including sign on outside of building, sign on door, etc.				
(d)(4)		3. Do the department registration documents reference the name of the hospital?				
(d)(4)		4. Locate the department/location on the internet (external organizational website). Document the naming and description information provided.				
(d)(4)		5. If you were a patient, would it be obvious to you that this location is part of the main hospital?				

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