Critical Access Hospitals often establish provider-based operations either on-campus or off-campus. Starting in 2008 CMS started a major change cycle relative to physician supervision involving provider-based operations. While CAHs were initially exempted from all of the supervision requirements, today CAHs must meet the same supervision requirements as do short-term acute care hospitals. Organizing and documenting physician supervision relative to provider-based operations is a significant compliance issue for CAHs.

Learning Objectives:
- discuss the various requirements under the Provider-Based Rule (42 CFR §413.65) relating to physician supervision requirements
- discuss the basic operational processes for provider-based clinics and hospital provider-based clinical activities
- explain the differing requirements for in-hospital, on-campus, off-campus clinics and hospital operations
- review the supervisory requirements for provider-based services
- explain how the supervision requirements have morphed over the past several years
• discuss both the overt and the subtle changes being made by CMS relative to supervisory requirements for hospital-based operations
• review the need for affirmative documentation to substantiate proper physician supervision
• discuss the concept of ‘incident-to’ for both physicians and hospitals
• discuss the difference between ‘clarifying’ guidance and ‘changed’ guidance
• review special circumstances for CAHs
• discuss the steps that must be taken relative to documentation for meeting the supervisory requirements
• review possible RAC audit issues for retroactive application
• discuss several case studies

Webinar Topics:
I. Review of the Provider-Based Rule (PBR)
   a. Development of the PBR
   b. 42 CFR §413.65 and Related Entries
   c. Rules and Regulations
   d. Physician Supervision Concerns
   e. Special Concerns for CAHs
II. Compliance Issues for Provider-Based Clinics
    a. Meeting Requirements and Conducting Audits
    b. Supervision Requirements
    c. Location Dependence
       i. In-Hospital
       ii. Out-of-Hospital and On-Campus
       iii. Off-Campus
III. Physician Supervision Requirements
     a. April 7, 2000 Federal Register
     b. CY2008 - CY2014 Federal Register Discussions
     c. Policy ‘Change’ versus ‘Clarification’
     d. New Supervisory Statements from CMS
     e. Compliance Concerns in Meeting Supervisory Requirements
     f. Special Areas – Observation, Infusions, Injections, Minor Procedures
     g. Provider-Based Clinic Challenges
     h. Non-Physician Practitioner Involvement
        i. Cardiac and Pulmonary Rehabilitation Requirements
     j. Establishing Who Is Providing Supervision
     k. Special Considerations for CAHs
IV. Operational Concerns
    a. Documenting Who Is Providing Supervision
    b. Keeping Physician/Practitioner Logs
V. RAC Audit Concerns
   a. Supervisory Requirements Not Met – Recoup Payment
   b. Retroactive Application of Policy Changes
VI. Case Studies
    a. Observation
    b. Emergency Department
    c. Infusion Centers
d. Wound Care Centers  
e. Provider-Based Clinics  
VII. Provider-Based Ambulance Services

**TARGET AUDIENCE**  
CAH personnel involved with provider-based clinic and/or clinical operations, compliance personnel, coding and billing personnel, nursing staff and interested physicians are encouraged to attend

**FEATURED FACULTY**  
Duane C. Abbey, Consultant & President  
Abbey & Abbey Consultants  

For over twenty years Abbey & Abbey, Consultants, Inc. has provided superior healthcare consulting services to hospitals, hospital systems, physicians, medical clinics and integrated delivery systems. Abbey & Abbey, Consultants, Inc. specializes in healthcare consulting primarily in the areas of:  
• Payment systems - reimbursement consulting  
• Delivery systems - organization of healthcare delivery  
• Compliance - developing compliance programs - emphasis in the coding, billing and reimbursement areas  

In addition to his consulting, Dr. Abbey has been an invited presenter for hospital associations, medical societies, and other groups. He has also published both articles and books on health care topics. Dr. Abbey earned his graduate degrees from the University of Notre Dame and Iowa State University.

Can’t make it at the scheduled time? Register anyway and for an extra $50 the recording will be sent right to your inbox after the webinar.