

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Free Clinic Credentialing and Privileging Policy	Procedure No.	Page No. 1 of 2
	Date of Origination: October 3, 2007	Review/Revision Date: September 6, 2011
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. C. [Signature]</i> 12/15/11
	Distributed to: CHP POLICY BOOK	

All practitioners providing care in the Ohio University Heritage Community Health Programs (OU-HCOM - CHP) Free Clinic goes through a credentialing and privileging process that is overseen by a qualified physician at OU-HCOM. The requirements for review for credentialing and privileging include:

Initial Credentialing will include:

- 1) *Primary source verification of:*
 - a) Current licensure
 - b) Relevant education, training, or experience

- 2) *Secondary source verification of:*
 - a) Identification (via a government issued picture ID)
 - b) Drug Enforcement Administration registration, as applicable
 - c) Hospital admitting privileges, as applicable
 - d) Immunization and TB skin test result status
 - e) Life support training, as applicable.

- 3) *Additional verification by:*
 - a) Querying the National Practitioner Data Bank (NPDB), as applicable (if the Free Clinic is ineligible to query the NPDB, it should have the LIP provide the results of a self- query) and

 - b) Determining practitioner's health fitness or the ability to perform the requested privileges (this can be determined by a statement from the individual that is confirmed either by the director of a training program, chief of staff/service of a hospital where the individual has privileges, or a licensed physician designated by the organization)

All practitioners must demonstrate by signing a statement that they are physically fit and free of communicable disease and are able to practice in the Free Clinic.

Reassessment of the Credentials and Privileges:

The Free Clinic will reassess the credentials and privileges of Health Care Provider at least every two (2) years. Renewed credentialing and privileging processes should include:

Primary source verification of:

- a) Current licensure, registration or certification

Secondary source verification of:

- a) Adherence to the Free Clinic's policies, procedures and rules
- b) Relevant education training and experience (if changed since initial appointment)
- c) The practitioner's ability to perform the care, treatment and services he/she has been providing and will be providing in the future at the Free Clinic
- d) Lack of any restrictions on privileges at any other health care organization
- e) An assessment of current competency to include a review of any relevant improvement information and querying the NPDB, as applicable.

All practitioners must demonstrate by signing a statement that they are physically fit and free of communicable disease and are able to practice in the Free Clinic

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**


Subject: Quality Improvement Plan Staff Supervision	Procedure No.	Page No. 1 of 1
	Date of Origination: October 3, 2007	Review/Revision Date: 9/2/2011
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. Calverton 12/15/11</i>
	Distributed to: CHP POLICY BOOK	

Appropriate Supervision and Assistance of Clinical Staff

Policy:

1. The certified nurse practitioner (CNP) works in collaboration with a practicing family medicine physician in the Department of the Ohio University Heritage College of Osteopathic Medicine under a Standard Care Agreement.
2. In order to ensure timely and direct evaluation of the patient, the nurse practitioner must be able to reach the collaborating physician or the collaborating physician's back up at all times for discussion and consultation either in person or by phone within 30 minutes.
3. In the event of a planned or unplanned absence of the CNP, scheduled patients will be contacted and rescheduled. If the client requires more immediate attention he/she will be directed to the appropriate health care facility and health care provider.
4. Support nursing coverage is provided for the clinic. Adequate coverage is maintained through scheduling and maintaining a list of available coverage in case of a planned or unplanned absence.

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Quality Improvement Plan Free Clinic Referral	Procedure No.	Page No. 1 of 2
	Date of Origination: October 3, 2007	Review/Revision Date: 09/02/2011
	Issued by: Kathy Trace Director CHP	Approved by:  12/15/10
	Distributed to: CHP POLICY BOOK	

Free Clinic Referral Pathway and Medical Home

Process:

1. OU-HCOM CHP Mobile unit provider, physician, or nurse practitioner shall refer the patient to a primary care provider or specialist when appropriate.
2. The nurse working a particular clinic shall complete the referral form (attached) according to the instructions written on the provider's form in the chart. If the nurse is unsure as to the provider's request, he or she shall follow up with the provider.
3. The patient will be referred to one or more of the following:
 - a. The primary care physician with whom the patient has already been established.
 - b. A Family Practice Resident.
 - c. A specialist in a particular field. Ex: cardiologist.
 - d. Or another qualified healthcare provider, according to the discretion of the providing physician or CNP.
4. A list of physicians and specialists for referral is provided for the nurse to make an appointment.
5. The patient establishes a medical home for follow up care.

Free Clinic Scheduling Protocol

Process:

1. Prospective patient calls Community Health Programs
2. Staff member (Nurse) in charge of Free Clinic calls asks the following questions to establish the individuals eligibility:
 - a. Are you between the ages of 18-64?
 - i. *The answer must be yes or the exception must be approved.*
 - b. Do you have medical coverage or prescription coverage/insurance?
 - i. *The answer must be no.*
 - c. How many people live in your home?
 - i. *Answer may vary.*

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Quality Improvement Plan Free Clinic Referral	Procedure No.	Page No. 2 of 2
	Date of Origination: October 3, 2007	Review/Revision Date: 9/2/2011
	Issued by: Kathy Trace Director CHP	Approved by:
	Distributed to: CHP POLICY BOOK	

- d. What is your yearly combined income?
 - i. *Must be within 200% of the Federal Guidelines for poverty. The numbers are provided each year for the staff.*
 - e. Do you live in Athens, Hocking, Meigs, Morgan, Perry, or Washington County?
 - i. *The answer must be yes; acceptance from other counties can occur if there are openings.*
 - f. What is the main reason you are seeking medical treatment at this time?
 - i. *Caller must have an episodic care need. Serious, acute care should be referred to clinic or hospital. Ex: injury, accident, chest pain, difficulty breathing, severe pain, vision changes, seizures, or fainting.*
3. If eligible, patient will be scheduled in the Free Clinic schedule located on the secure CHP server.
4. Labels will include the date of service and will be made for each patient and used in the charts on the referral forms. Label information should be updated at each patient appointment and entered into the data base to keep contact info current. Labels will not include the problem the patient is seeking medical care.

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Quality Improvement Plan Confidentiality	Procedure No.	Page No. 1 of 1
	Date of Origination: October 3, 2007	Review/Revision Date: 09/02/2011
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. C. [Signature]</i> 12/5/11
	Distributed to: CHP POLICY BOOK	

Confidentiality

Policy:

All employees and volunteers of the Free Clinic shall maintain the confidentiality of patient records and other information to the extent required by law and must comply with HIPAA. Patient records may not be released without the consent of the patient, legal guardian, or court order. Original patient records cannot be removed from the premises without appropriate authorization.

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Quality Improvement Plan Prescriptions	Procedure No.	Page No. 1 of 1
	Date of Origination: October 3, 2007	Review/Revision Date: 09/2/2011
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. Carlson</i> 12/15/11
	Distributed to: CHP POLICY BOOK	

Prescriptions

Policy:

The attending CNP who holds a valid certificate to prescribe may prescribe in accordance with the Ohio Revised Code, the rules of the Board of Nursing and within the formulary made available by the board of nursing. The Free Clinic Advisory Committee will have input into these guidelines. Ex: Narcotics will not be dispensed through the Free Clinic.

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: REPORTING ABNORMAL RESULTS TO PATIENTS	Procedure No.	Page No. 1 of 1
	Date of Origination: October 3, 2007	Review/Revision Date: 9/2/2011
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. C. Lewis</i> 12/15/11
	Distributed to: CHP POLICY BOOK	

Patients are notified of abnormal results. There are attempts made to communicate to the patient by phone (by mail if there is no phone) within 48 hours if indicated by the health care provider. Detailed messages are not left on the answering machines. A request is left on the machine for the patient to call back to receive the information. Three attempts are made to contact the patient and then a certified letter is mailed.

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Quality Improvement Plan Patient Rights and Privileges		Page No. 1 of 1
	Date of Origination: October 3, 2007	Review/Revision Date: 09/02/2011
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. Culbertson</i> 12/15/11
	Distributed to: CHP POLICY BOOK	

The OU-HCOM Community Health Program's Free Clinic is dedicated to providing free episodic care.

If the patient is uncomfortable with the physician for any reason, he/she should discuss this with his/her physician. If the patient and physician are unable to come to an understanding, Ohio University Osteopathic Medicine staff will assist the patient in seeking another physician.

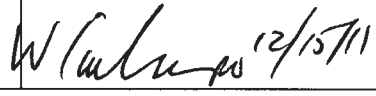
The patient may expect complete and up-to-date information about his/her diagnosis, recommended/alternative treatment plans, and the prognosis of his/her case. All of this information should be given to the patient in a manner that he/she can easily understand. Special care will be taken to assist patients in reading instructions and other patient education materials when needed.

The patient should request that all pertinent information be communicated in terms he/she understands, such as a description of the procedure, medical risks that may be involved, and the usual length of time for recovery.

The patient may refuse any treatment. The physician's obligation is to explain options for treatment including pro's and con's for the patient's problem. The final decision rests with the patient. The patient should not agree to anything he/she does not want done to them or for them.

All personal health information (PHI) is confidential and will be utilized in compliance with all federal, state and local rules and regulations.

OHIO UNIVERSITY HERITAGE OSTEOPATHIC MEDICAL CENTER

Subject: Free Clinic Tracking for Follow Up of Referrals	Procedure No.	Page No.
	Date of Origination: September 28, 2007	Review/Revision Date: September 7, 2011
	Issued by: Kathy Trace Director CHP	Approved by:  12/15/11
	Distributed to: CHP POLICY BOOK	

PURPOSE: To provide a systematic method for follow up on patients referred for follow up care.

PROCEDURE: All attempts will be made at the time of visit in the clinic to call and schedule referral appointment. If the patient prefers to make their own appointment, appropriate referral paperwork will be distributed to the patient.

Referral form will be faxed to the appropriate health care provider by the nurse or CNP.

At the end of each month, the nurse will review a list of patients referred for follow up care. Patients who did not schedule follow up care will be notified by certified mail of the necessity for follow up and establishment with a Primary Care Physician.

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Patient Notice of Limited Legal Liability	Procedure No.	Page No. 1 of 1
	Date of Origination: 9/1/2011	Review/Revision Date:
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. Culman</i> 12/15/11
	CHP POLICY BOOK	

POLICY

1) The Free Clinic:

- a) Will provide each patient with written notification of the limited liability of the health care professional pursuant to FTCA.
 - b) Will satisfy this requirement by having each patient review a notification document prior to the first encounter between the patient and the health care professional.
 - c) Will obtain the patient's signature on the notice and include the notice in the patient's medical record.
 - d) Will provide the notice to a parent or legal guardian when the patient lacks legal responsibility for his/her care under the law of the State where care is provided.
- 2) If the Free Clinic is providing emergency care, Free Clinic staff will provide the written notice as soon as practicable.

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Risk Management Plan	Procedure No.	Page No. 1 of 1
	Date of Origination: December 27, 2007	Review/Revision Date: 9/2/2011
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. Coulson</i> 12/15/11
	Distributed to: CHP POLICY BOOK	

PURPOSE:

The Ohio University Heritage College of Osteopathic Medicine (OU-HCOM) Clinic has risk management protocols in place for the purpose of decreasing risk to the clinic and ensuring patient, staff, volunteer, and clinic safety.

OBJECTIVES:

1. To provide defined mechanisms that will help ensure the least potential risk to the clinic's administration, personnel, and clinical operations.
2. To ensure systems are in place that respond to indentified risks in an organized structured manner.
3. To assess and improve all clinic operations as needed.

SCOPE:

The clinic's Risk Management Plan includes the following areas of clinic operations:

- Health Care Practitioner Credentialing and Privileging
- Patient Care
- Personnel and Volunteer Policies and Procedures
- Quality Assurance
- Peer Review Process
- Clinic Guidelines
- Health Insurance Portability and Accountability Act (HIPAA)

RESPONSIBILITIES:

Governing Board:

The Ohio University Heritage College of Osteopathic Medicine Free Clinic Advisory Committee recruited by Community Health Programs (CHP) Medical Director and CHP Director has

ultimate responsibility for all clinic functions. This includes implementing and maintaining activities that will ensure quality care while decreasing potential risk for patients, staff, volunteers, and the clinic.

Medical Director:

On a daily basis, the Medical Director of the clinic is responsible for overseeing any clinic activities, including those designed to promote risk management, and for ensuring that the risk management activities are in compliance with the federal and state occupational health standards in the workplace and accepted healthcare standards for patients. The Medical Director is also responsible for keeping the OU-HCOM Free Clinic Committee of OU-HCOM clinic updated of the clinic's risk management activities on an ongoing basis.

Executive Director:

The Executive Director of OU-HCOM Clinic will also be responsible for ensuring that the Risk Management Plan for the clinic is in place. The Executive Director will be responsible for notifying the appropriate insurance agencies of any occurrences during the course of the clinic's operations.

POLICIES AND PROCEDURES

Policies shall be adopted for the clinic's identified risk management activities which shall be used in conducting activities regarding risk management in the clinic. These policies and procedures shall be updated as needed by the Free Clinic Advisory Committee, Medical Director, and or Executive Director.

COMMUNICATION ON RISK MANAGEMENT ACTIVITIES

Reports on any activities relating to the scope identified will be submitted to the OUCOM Free Clinic Advisory Committee. These reports shall be in writing, using standard form, and shall include recommendations or action plans for the improvement of the clinic functions.

CONFIDENTIALITY

When appropriate, risk management activities will remain confidential.

RISK MANAGEMENT EVALUATION

The Risk Management Plan will have evaluation criteria which the OU-HCOM Free Clinic Committee (The Free Clinic Advisory Committee) will utilize in determining whether or not actions/changes need to be made to ensure the best possible overall Risk Management Plan for the clinic.

RISK MANAGEMENT TRAINING EDUCATION

Education and training programs are identified and outlined in each Risk Management Plan. They should include details on the following areas:

- 1. Health Care Practitioner Credentialing and Privileging
- 2. Patient Care
- 3. Personnel and Volunteer Policies and Procedures
- 4. Quality Assurance
- 5. Peer Review
- 6. HIPAA

Approved by: The Ohio University Heritage College of Osteopathic Medicine Free Clinic Committee

Original Date: 27 December, 2007

Reviewed By Risk Manager

_____ **Date** _____

Revisions Suggested: _____

Reviewed By Medical Director

_____ **Date** _____

Revisions Suggested: _____

Reviewed By Clinic Director

_____ **Date** _____

Revisions Suggested: _____

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: FREE CLINIC RISK MANAGEMENT PROTOCOLS	Procedure No.	Page No. 1
	Date of Origination: 09/01/2011	Review/Revision Date:
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. C. Lewis</i> 12/15/11
	Distributed to: CHP POLICY BOOK	

Medical Records

For every patient seen at the Ohio University Heritage College of Osteopathic Medicine (OU-HCOM) Free Clinic, medical records will be maintained. A system is in place for tracking those patients who miss appointments, require follow-up referrals, and who need laboratory or x-ray results. The Medical Director reviews patients' medical records on a quarterly basis to determine quality, completeness, and legibility. The collaborating physician will also review a random selection of CNP records on a quarterly basis.

Free Clinic

The OU-HCOM Free Clinic Advisory Committee meets quarterly and more often if needed to review and assess quality assurance issues. This committee considers findings from its CHP/collaborating review process when reviewing and/or revising the quality assurance plan. These findings will be utilized to modify policies that will improve patient access to care and patient outcomes.

Risk Management Activities

OU-HCOM's health professionals will have the opportunity to annually participate in risk management continuing education activities that are offered by hospitals and continuing educational programs in the community. Activities include HIPAA and Blood Borne Pathogen updates.

Malpractice for the Free Clinic

When a health professional is 'deemed' by the Federal Tort Claims Act (FTCA), OU-HCOM will assure that each volunteer has a copy of the updated PIN and that his/her questions regarding FTCA medical malpractice coverage has been addressed.

Prescriptions

Patients seen through the OU-HCOM Free Clinic will be given a month supply of free medications deemed necessary by the health care provider. Patients will be referred to indigent med programs for continuing medications. Prescriptions will be tamper resistant and will have a phone number where the provider will be reached for prescription questions.

**OHIO UNIVERSITY HERITAGE COLLEGE OF OSTEOPATHIC MEDICINE
COMMUNITY HEALTH PROGRAMS**

Subject: Quality Improvement Plan Medical Records Risk Management Protocol	Procedure No.	Page No. 1 of 1
	Date of Origination: May 12, 2005	Review/Revision Date: 9/2/2011
	Issued by: Kathy Trace Director CHP	Approved by: <i>W. Anderson</i> 12/15/11
	Distributed to: CHP POLICY BOOK	

1. The CNP and physicians will participate in the development and implementation of applicable portions of the Free Clinic Quality Improvement Plan.
2. An adequate number of charts from the Free Clinic will be reviewed by the Collaborating Physician quarterly each rolling year.
3. Chart reviews, inclusive of all providers, through an independent sampling will be preformed quarterly by the Medical Director.
4. Findings will be discussed and documented.
5. The findings will also be discussed at the quarterly Free Clinic Advisory Board meetings and a confidential file will be kept to maintain the records in the office of the Director of Community Health Programs.
6. Any undesirable trends in documentation will be discussed and documented at the advisory meeting in the minutes.
7. Revisions to patient care plans, policies, and procedures can result if the need arises.