



NATIONAL ASSOCIATION OF
Community Health Centers®

Health Center Operational Site Visits: Preparing for Success and Continuous Compliance

2022 Community Health Institute & Expo

August 29, 2022, 1:30 – 2:45 PM CT



Virtual Participants

Chat
(use to talk with peers)



Polling/Q&A
(participate in polls, ask questions to faculty)

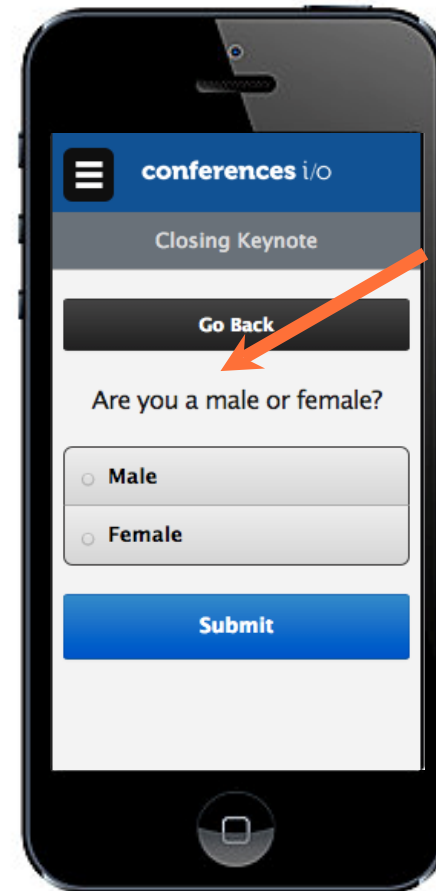
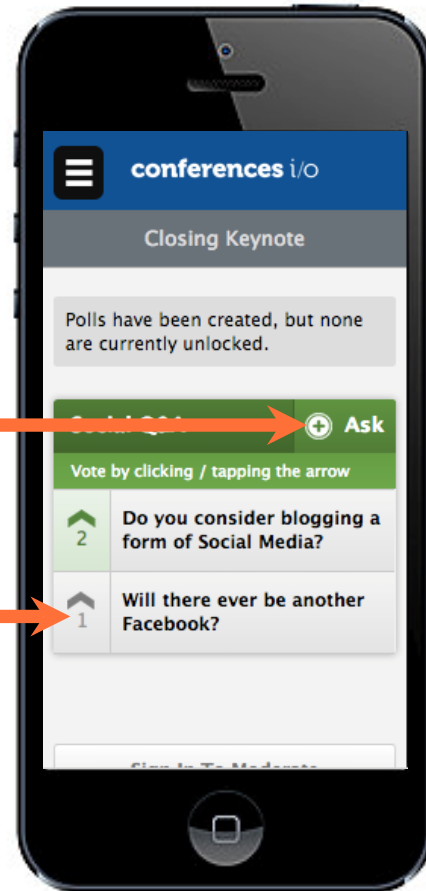


The screenshot displays a virtual meeting interface. On the left, there are two windows: a 'Sessions Info' chat window and a 'Polling' window. The chat window shows messages from participants like Brian Long, James Winkler, and Laura Whipple. The poll window shows a question: '#1: What is your biggest business writing challenge? (NO RIGHT ANSWER - OPEN QUESTION)'. The poll results are: Clinician (45%), Structure and/or Roles (20%), Content Structure (10%), Tone (10%), and Other (10%). The main area features a video feed of a man in a dark suit and white shirt. To the right of the video is a presentation slide with a colorful graphic and the title 'UDS Reporting: Preparing, Doing, and Utilizing'. The slide also includes the CURIS logo and the text 'Cultivating Health Center Operations'. At the bottom of the interface, there are navigation buttons for 'Sessions', 'Support', 'Profile', 'Options', and 'Windows', along with a 'Digitell' logo.

In-Person Participants

Give us
Feedback

Up-Vote a
Comment



Click on
question and
then
Respond to
Polls when
they appear



Vote / Give Feedback/ Respond to Polls



NATIONAL ASSOCIATION OF
Community Health Centers®

THANK YOU TO ALL COMMUNITY HEALTH CENTERS

#ThankYouCHCs

This program is supported by the Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services (HHS) as part of an award totaling \$6,625,000 with 0 percentage financed with non-governmental sources. The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by HRSA, HHS, or the U.S. Government. For more information, please visit [HRSA.gov](https://www.hrsa.gov).

NACHC's STRATEGIC PILLARS

1



Equity and Social Justice

Center everything we do in a renewed commitment to equity and social justice

2



Empowered Infrastructure

Strengthen and reinforce the infrastructure for leading and coordinating the Community Health Center movement, notably consumer boards and NACHC itself

3



Skilled and Mission-driven Workforce

Develop a highly skilled, adaptive, and mission-driven workforce reflecting the communities served

4



Reliable and Sustainable Funding

Secure reliable and sustainable funding to meet increasing demands for Community Health Center services

5



Improved Care Models

Update and improve care models to meet the evolving needs of the communities served

6



Supportive Partnerships

Cultivate new and strengthen existing mutually beneficial partnerships to advance the shared mission of improving community health

To learn more about NACHC's Strategic Pillars visit <https://www.nachc.org/about/about-nachc/>

THE NACHC MISSION

America's Voice for Community Health Care

The National Association of Community Health Centers (NACHC) was founded in 1971 to promote efficient, high quality, comprehensive health care that is accessible, culturally and linguistically competent, community directed, and patient centered for all.



Learning Objectives

Describe HRSA's current and potential future approach to assessing compliance with Health Center Program requirements.

Highlight the perspectives of a health center leader and OSV reviewer with regards to preparing and conducting the OSV.

Identify practical tips and strategies for creating a culture of continuous compliance.

Agenda

I

Welcome, Introductions

II

**Health Center Program Compliance
+ Operational Site Visit (OSV)
Overview**

III

**OSV Panel Discussion:
Review Team Lead &
Health Center CEO**

IV

Questions & Answers

Live Content Slide

When playing as a slideshow, this slide will display live content

Poll: When is Your Operational Site Visit?

Live Content Slide

When playing as a slideshow, this slide will display live content

Poll: How confident are you in your health center's preparation and readiness for the OSV?



Health Center Program Compliance Overview

Angela Powell MPH, CPH,

Director
Office of Health Center Program
Monitoring
Bureau of Primary Health Care, HRSA





**National Association of Community Health Centers
Community Health Institute**

Operational Site Visits (OSVs) Overview

August 30, 2022

Angela R. Powell, MPH, CPH

Director, Office of Health Center Program Monitoring

HRSA, Bureau of Primary Health Care

Vision: Healthy Communities, Healthy People



Bureau of Primary Health Care Strategic Priorities

To increase access to the health center model of care, improve health outcomes, reduce health disparities, and advance health equity for underserved populations

Priority 1: Strengthen health centers to address critical and emerging health care issues and the evolving health care environment

- Support the Health Center Workforce
- Advance Health Center Excellence
- Strengthen COVID Response and Future Preparedness
- Improve Health Center and Partner Engagement

Priority 2: Activate and accelerate evidence-based and innovative or new high-value models of care delivery for underserved and vulnerable populations

- Introduce Patient-Level Data Reporting
- Engage in Value-Based Care Delivery
- Promote Innovation

Priority 3: Expand the reach of the health center model of care in the nation's highest need communities and populations

- Support Comprehensive Care Service Delivery
- Reach High Need Communities
- Build New Partnerships



Organizational Structure

BPHC Mission

Improve the health of the nation's underserved communities and vulnerable populations by assuring access to comprehensive, culturally competent, quality primary health care services

Office of the Associate Administrator
Associate Administrator
James Macrae
Deputy Associate Administrator
Tonya Bowers

Division of Workforce Management
Director
Angela Damiano-Holder
Deputy
David Dietz

Office of Strategic Business Operations
Director
Kathryn Mitchell
Deputy
Holly Schumann

Office of Health Center Investment Oversight
Director
Ernia Hughes
Deputy
Katie Ballengee

Office of Health Center Program Monitoring
Director
Angela Powell
Deputy
Erin Davis

Office of Policy and Program Development
Director
Jennifer Joseph
Deputy
Amanda Ford

Office of Quality Improvement
Director
Suma Nair
Deputy
Sue Lin



Operational Site Visit (OSV) Overview



Support HRSA's oversight of the Health Center Program

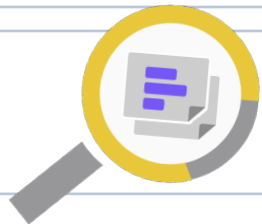
Provide an objective assessment and verification

Conducted at least once per project/designation period (PP/DP)

3 year PP/DP = midpoint
1 year PP/DP = between 2-4 months



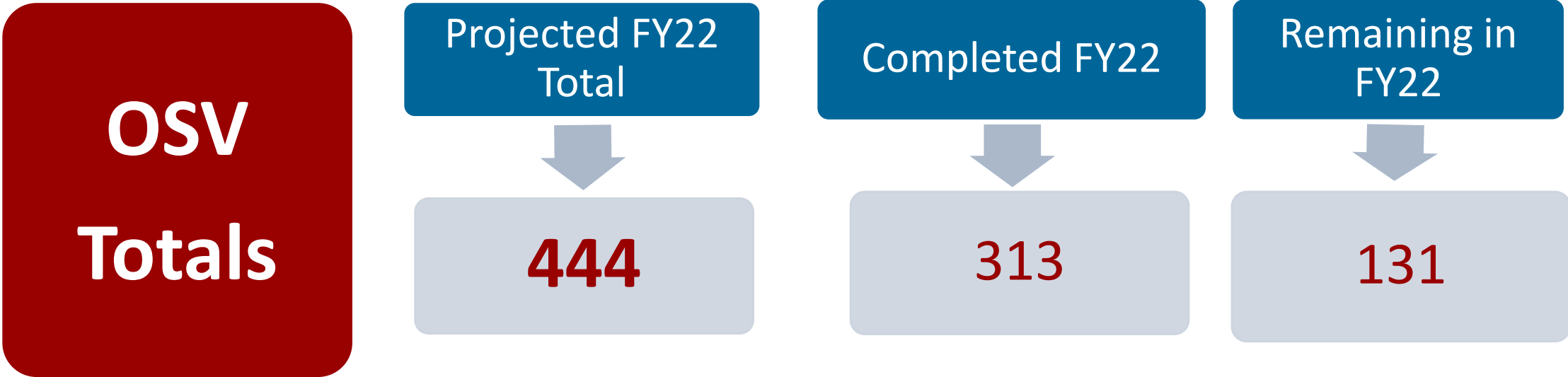
OSV team includes federal representation and consultants



Operational Site Visit (Virtual and Onsite)

CY 2022 Operational Site Visits (OSVs) Update

Timeframe: 1/1/2022 – 6/30/2022



Operational Site Visit (OSV) Update

Timeframe: 1/1/2022 – 6/30/2022 (Continued)

OSV Statistics

Total Number of Reports Completed:
208



Compliance Resolution Opportunity (CRO)

Total Non-Compliant Elements: **2,344**

Non-Compliant Elements Resolved through CRO: **1,913**



Health Centers with 100% Compliance

Total : **145**

- Without CRO: 8
- With CRO: 137



Operational Site Visit (OSV) Update

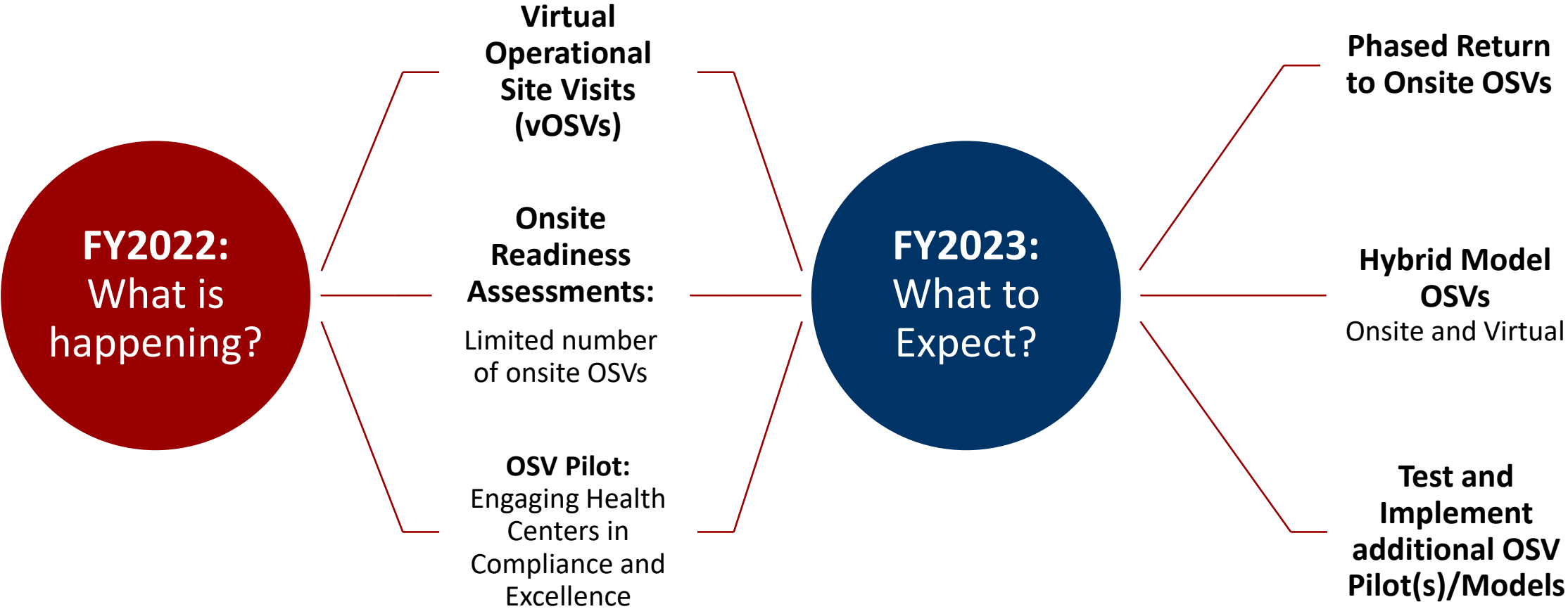
Timeframe: 1/1/2022 – 6/30/2022 (Continued)

Top 5 Non-Compliant Elements assessed via Compliance Resolution Opportunity (CRO)

Required and Additional Services	Board Authority	Clinical Staffing	Clinical Staffing	Sliding Fee Discount Program
<i>a. Providing and Documenting Services within Scope of Project</i>	<i>c. Exercising Req. Authorities and Responsibilities</i>	<i>e. Credentialing and Privileging Records</i>	<i>d. Procedures for Review of Privileges</i>	<i>j. Sliding Fee for Column III Services</i>



Operational Site Visits (FY2022 → FY2023)

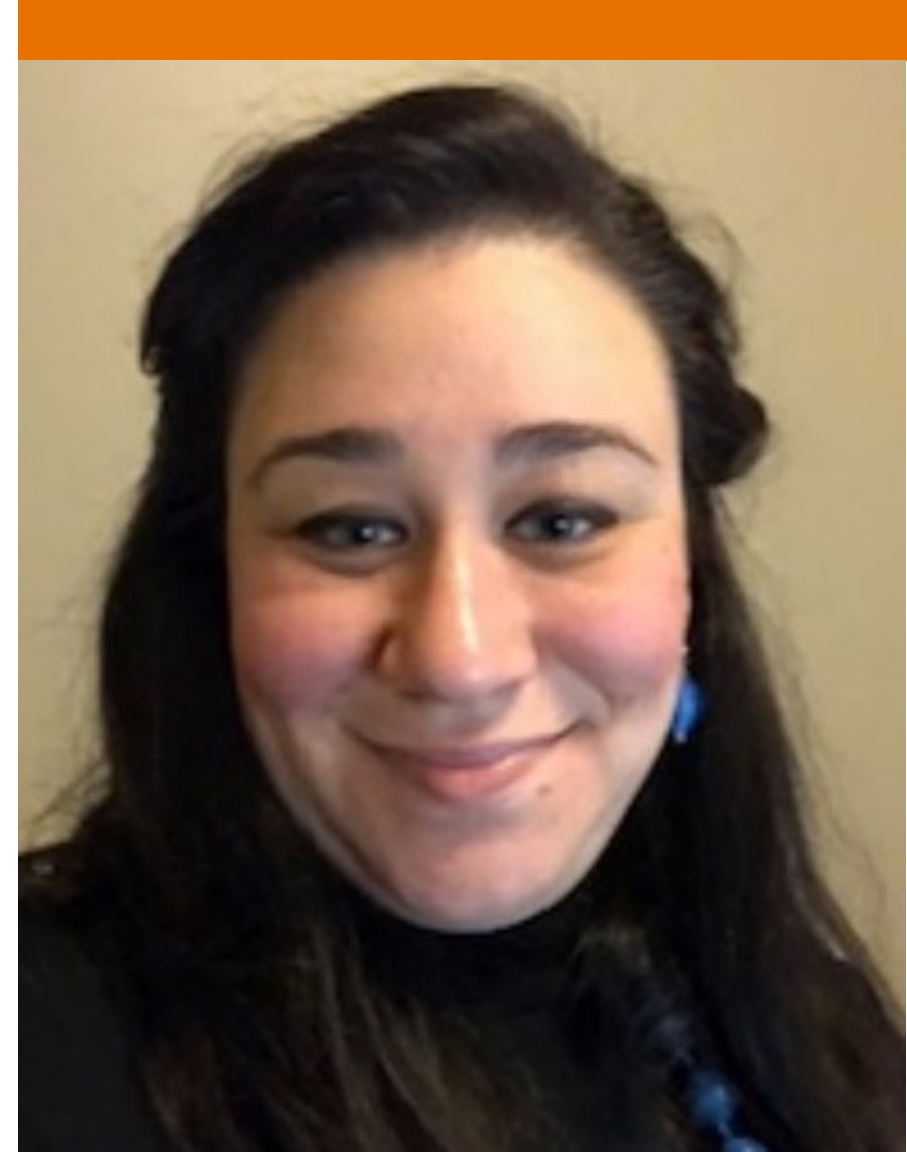


Panel Discussion

- Operational Site Visit Team Lead
- Health Center Chief Executive Officer

Jennifer Genua-McDaniel, BA, (Hons), CHCEF

Chief Executive Officer
Genua Consulting



Judith Watson RN, BSN , MPH

Chief Executive Officer
Mount Vernon Neighborhood Health Center



Pre-Site Visit:

Team Lead Perspective

1. As a Team-Lead, what is your general approach to conducting the Operational Site Visit?
2. When and how do you initiate communication with Mount Vernon Neighborhood Health Center?
3. How and when did you review files?

Disclaimers

This presentation is not endorsed by Management Strategists Consulting Group (MSCG)

This presentation is not endorsed by Health Resources Services Administration (HRSA) or Bureau of Primary Health Care (BPHC)

Not employed by MSCG or BPHC

Independent Consultant who is contracted to do Operational Site Visits (OSV)s and Technical Assistance (TA)

Not intended to provide legal advice

Please refer to your HRSA Point of Contact for specific questions or use the BPHC Contact Form

Pre-Site Visit:

Team Lead Perspective

- Officially received the assignment **October 28, 2021**

- Logistics Confirmation Email - TA008030 - Mount Vernon Neighborhood Health Center - Mount Vernon, NY

Yahoo/MSCG ★

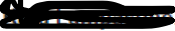


• mbailey@imstrategists.com

To: reimburse@msginc.com, moniquedumond@cox.net, jagmd2001@yahoo.com, michelle@infidiumhs.com, adminmsg@msginc.com
Cc: lduelow@imstrategists.com, kburks@msginc.com, rdavis@msginc.com, klampasone@hrsa.gov, mbailey@imstrategists.com

Thu, Oct 28, 2021 at 1:38 PM ★

Greetings!

This email is to confirm your participation as a consultant to the Mount Vernon Neighborhood Health Center - Mount Vernon, NY virtual Operational Site Visit. The Project Officer for this assignment is 
Please confirm with me by email that you have received this information; feel free to contact me with any questions or concerns.

Virtual Site Visit: The visit will be conducted over the GoToMeeting Video and Audio-Conferencing technology and you are required to have a stable internet connection and up to date anti-virus protection. Please remember that the internet charges will not be reimbursed. [Click here to see the system requirements for GoToMeeting Video and Audio Conferencing.](#)

Pre-Planning Call

It is required, unless otherwise stated by the Project Officer, for all site visits to have a pre-planning video/conference call. Please contact the Project Officer for scheduling and availability prior to reaching out to the grantee. **An automated email from MSCG with the video/audio conference call number will be sent to the consultant team few weeks prior to the virtual site visit dates.**

Consultant Voucher

MSCG consultants are required to submit their voucher and receipts via consultant portal.
Vouchers: <https://www.msginc.com/consultant> (Please use msgc consultant portal username and password to login).

TA Operational Site Visit Report

[Click here for instructions to complete the Operational Site Visit report.](#)

To complete the report please use this link to TATS: <https://grants.hrsa.gov/2010/WebEPSEExternal/Consultant/Interface/Common/AccessControl/Login.aspx> (Please use TATS username and password to login).

Contract No: V286.0400 (Northeast Division-BPHC)

Task Order No: 75R60221F34003

TA Request No: TA008030 (Virtual)

TA Type: Operational Site Visit

Consultant Information

Pre-Site Visit:

Team Lead Perspective

- Reached out to the site visit team **October 28, 2021**, for draft agenda
- Immediately called the CEO to introduce myself of as team lead
 - Team introductions including Federal Representative
 - Next steps
 - Tips for the site visit
 - Documents
 - Areas of concern
 - Virtual tour
 - Any questions or concerns

Pre-Site Visit: Team Lead Perspective

- Team Lead Official Email: **November 1, 2021**

Hi Judith,

My name is Jennifer Genua-McDaniel and I am the Team Lead for your Virtual Operational Site Visit which will start Wednesday December 8th and end Friday December 10th. I will be joined by my colleagues Michelle Layton who will review the Clinical Areas and Monique Dumond who will review the Fiscal Portion. We are also happy to have [REDACTED], who will be our HRSA Federal Representative.

The purpose of the site visit is to assess compliance with the HRSA Program Requirements. I wanted to provide you with some resources that will help with the process. Our goal is to work collaboratively with you, the team and your board members.

Here are some resources that will help that I am attaching to this email:

- 1) **The HRSA Site Visit Protocol**- HRSA has updated this protocol on May 27, 2021 and I have attached the most recent one. This protocol is what we will be using to assess compliance. It provide all of the questions and methodologies that we'll be using.
- 2) **The Health Center Compliance Manual**- This is the Compliance Manual that is the companion to the Site Visit Protocol. I've attached it just in case.
- 3) **Credentialing and Privileging File Resource Guide**- HRSA has updated this Guide. This is is the guide that Michelle will be using in conjunction to the other 2 documents which outlines how the Credentialing and Privileging Files should be outlined.
- 4) **Health Center Program Sampling Resource Guide**- This tool has been updated and outlines what patient/non-patient files and samples that you'll need to demonstrate compliance. The link is: <https://bphc.hrsa.gov/programrequirements/site-visit-protocol/sampling-review> .
- 5) **The HRSA Health Center Naming Convention**- This is the HRSA Naming Convention to use when you name documents. I know it can be a little tricky but if you have any questions just let me know.
- 6) Other Resources-I'm attaching some helpful tips on the Virtual Tour.
- 7) **The DRAFT Agenda**- I'm attaching the Draft Agenda. If you could please just fill out the first page and send it back to me. During the pre-OSV call that we'll have we'll go through the agenda and discuss logistics, the virtual tour, documents etc.

My next step is to work with the HRSA Team to pick out some dates and times and then run them by you to see if they would work for the pre-OSV call.

If you can confirm receipt of this email and please let me know if you have any questions. The goal of the virtual visit is to work along side you collaboratively. Thank you for all you do! I know it hasn't been easy lately and appreciate all that you do.

Jenn

Jennifer Genua-McDaniel
OSV Team Lead
(928) 201-4644

Pre-Site Visit: Team Lead Perspective

- Official Pre-OSV call: **November 23, 2021**

Hi Judith,

Thank you so much for taking my call today and for being free on November 23, 2021 to complete the Pre-OSV call. I will be sending a calendar request with the Go To Meeting so you can pass it onto the team that will be participating on the call but wanted to provide it in this email as well.

During the Pre-OSV call we will be discussing:

- 1) Brief introductions of HRSA Team and Health Center Team
- 2) Purpose of the site visit
- 3) Draft Agenda
- 4) Logistics, Virtual Tour, Documents and meeting with the Board of Directors
- 5) Any other questions.

This call should last around an hour.

The call will be:

Tuesday November 23, 2021 @ 2:00 pm EST

Go To Meeting:

<http://HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413>

Call In Number: (872) 240-3412


Access Code: 207521413

I will send a calendar request with this information but wanted to provide it also in an email.

Thank you again and we are very excited to be your team.

Best,
Jenn

Jennifer Genua-McDaniel
OSV Team Lead



Setting pre-OSV call
dependent on:

- Schedules
- Availability
- Any logistics challenges

Pre-Site Visit: Team Lead Perspective

- Day 1 of OSV: December 8, 2021
 - Health Center decides who participates on the entrance
 - Virtual Tour right after the Entrance
 - 1st site tour is where health center has most of their Form 5A services
 - 2nd site tour can be another designated site (mobile, specialty, dental only etc.)

Wednesday December 8, 2021: (Day 1) –

Hours	Administrative/Governance HTTPS://GLOBAL.GOTOMEETING.CO M/join/207521413	Clinical HTTPS://GLOBAL.GOTOMEETING.CO M/join/578155061	Fiscal HTTPS://GLOBAL.GOTOMEETING.CO M/join/248126525
8:30 am to 9:00 am	vOSV Team Meeting – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413		
9:00 am to 10:00 am All Group Meetings will utilize the Team Lead GotoMeeting Link & Line #s	Entrance conference - Senior Management and Board Members: Introductions, opening remarks and purpose of site visit; Review of OSV agenda including: - Confirm meeting time with the Board of Directors; Discuss staff meetings and interviews; Confirm virtual tour of clinic site (s) if applicable; Confirm the schedule for the exit conference Federal Representative – Provides HRSA/BPHC Update; COVID19 presentation and discussion on changes in scope, credentialing, and emergency/pandemic response preparedness plans, as health centers meet the needs of patients on the front line of the health crisis Health Center Overview and Update: History and significant developments; Challenges that have been encountered; Health Center growth opportunities; Changes in the health care environment		
10:15 am to 10:45 am	Participate in Tours (Optional) or <i>Review of Documents</i>	TWO Virtual Tour(s): Site location(s) where the majority of Column I services are provided (tour up to two locations)	Participate in Tours (Optional) or <i>Review of Documents</i>
10:45 am to 12:00 pm	Review of Documents	LEADS Meeting w/CEO, CMO, COO, & Others _____: Chapter 4 – Required and Additional Services – Review of Form 5A – Scope of Project, Contracts for Column II & III Services	Participate in Meeting (Required): Chapter 4 – Required and Additional Services – Review of Form 5A – Scope of Project, Contracts for Column II & III Services
12:00 pm to 1:00 pm	Lunch Break		
1:00 pm to 3:30 pm	Meets w/CEO & Others? _____; 2:00-3:00 pm Chapter 3 - Needs Assessment; Chapter 6 - Locations & Hours of Operation Form 5B ; Chapter 14 - Collaborative Relationships – Coordination & Integration Activities <i>Review of Documents</i>	1:00 pm: Chapter 7 – Coverage for Emergencies During & After-Hours Coverage; Chapter 8 - Continuity of Care & Hospital Admitting 2:00 pm: Meets w/Designated Facilitator: Review of Samples for Chapter 4, Chapter 7, Chapter 8, Chapter 10 – via GotoMeeting – or – Review Redacted Screen Shot PDF Files	Meets w/CFO, Add Billing Mgr. for Chapter 16 and Chapter 9 Chapter 15 - Financial Management and Accounting Systems Chapter 17 – Budget; and Chapter 18 – Program Data Reporting Systems – Fin & Operational Reporting Chapter 16 - Billing & Collections Chapter 9 - Sliding Fee Disc. Program <i>Review of Documents</i>
3:30 pm to 4:00 pm	Debrief for Federal Representative – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413		
4:00 pm to 4:30 pm	Debrief for CEO (Others?) – Opportunity for Status Check-in to keep CEO informed, identify any missing documents, & discuss any preliminary findings – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413		

Pre-Site Visit: Team Lead Perspective

Day 2 of OSV: December 9, 2021

- Health Center makes the decision which staff will participate in interviews
- Meeting with the Board was an hour and 15 minutes (shortened time)
- Technical Assistance (TA), Recruiting board members, is the board getting the correct data to make decisions, is the board getting data in a manner that makes it easy to understand

Thursday December 9, 2021: (Day 2)

Hours	Administrative/Governance HTTPS://GLOBAL.GOTOMEETING.CO M/join/207521413	Clinical HTTPS://GLOBAL.GOTOMEETING.CO M/join/578155061	Fiscal HTTPS://GLOBAL.GOTOMEETING.CO M/join/248126525
8:30 am to 9:00 am	vOSV Team Meeting – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413		
9:00 am to 12:00 pm	11:00 am - LEADS Meeting w/CEO, CFO, Compliance, & Others _____?: P&Ps; Chapter 13 - Conflict of Interest - P&Ps, Disclosure, Occurrences 10:00 am: Meets w/CEO: Chapter 19 – Board Authority – Discussion on Working with the Governing Board and TA on Selected Topics <i>Review of Documents & Preparation for Meeting with Governing Board</i>	9:00 am: Meets w/HR & Others _____: Chapter 5 – Clinical Staffing – Credentialing/Privileging P&Ps; Review Sample of C&P Files - LIPs & Other Licensed/Certified Staff	9:30 am – Participates in Meeting CFO, Compliance, & Others _____?: Chapter 12 – Contracts: Procurement, Purchasing, Contract Management P&Ps; Chapter 16 - Billing & Collections- review samples Chapter 9 - Sliding Fee Disc. Program-review samples <i>Review of Documents</i>
11:30 am to 12:00 pm	Lunch Break		
12:00 pm to 1:30 pm <i>(Can be scheduled at convenience of Board)</i>	vOSV Team meeting with Governing Board – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413 Session Lead by Administrative/Governance Reviewer: Chapter 19 – Board Authority and Chapter 20 – Board Composition - Discussion on Board Authority, Roles and Responsibilities, Program Requirements, and Other TA Topics		
1:30 pm to 3:30 pm	1:30 pm: Meets w/CEO & HR: Chapter 11 – Key Management - Distribution of Functions, Vacancies, Recruitment, and Evaluations 2:30 pm: Review of Records: Chapter 20 – Board Composition – Review of Composition and Past 24-Month Billing Record for Patient Members of the Governing Board Facilitated Samples: via GotoMeeting – or – Review Redacted Screen Shot PDF Files	1:30 pm: Meets w/CMO, QA/QI Dir, COO, Nursing Dir, & Others _____: Chapter 10 – QA/QI Plan & Activities; Chapter 21 – Federal Torts Claims Act	Review/Follow up on items if needed Facilitated Samples: via GotoMeeting – or – Review Redacted Screen Shot PDF Files
3:30 pm to 4:00 pm	Debrief for Federal Representative – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413		
4:00 pm to 4:30 pm	Debrief for CEO (Others?) – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413		

Pre-Site Visit:

Team Lead Perspective

Day 3 of OSV: December 10, 2021

- AM was spent with the CEO. Had requested some technical assistance on health center issues
- Exit Conference:
 - Health Center decided who participated in the debrief
 - Report out with minimal questions
 - Federal Representative explained the Compliance Resolution Process (CRO)

Friday December 10, 2021, Month/Day: (Day 3)

Hours	Administrative/Governance HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413	Clinical HTTPS://GLOBAL.GOTOMEETING.COM/join/578155061	Fiscal HTTPS://GLOBAL.GOTOMEETING.COM/join/248126525
8:30 am to 9:00 am	vOSV Team Meeting – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413		
9:00 am to 11:45 am	<i>Finalizes Document Review and/or Follow-up with Key Staff, as may be needed</i> Will Call Direct Line	<i>Finalizes Document Review and/or Follow-up with Key Staff, as may be needed</i> Will Call Direct Line	<i>Finalizes Document Review and/or Follow-up with Key Staff, as may be needed</i> Will Call Direct Line
11:45 am to 12:00 pm	Debrief for Federal Representative – HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413		
12:00 pm to 1:00 pm	Exit conference - Senior Management and Board Members: HTTPS://GLOBAL.GOTOMEETING.COM/join/207521413 HRSA Team and Federal Representative to present the following: Summary of the site visit findings – Team Members <ul style="list-style-type: none"> • Recommendations – Team Members • Next steps in vOSV process – HRSA/BPHC Federal Representative • Question and answers 		
	vOSV Review Phase Concludes		

The agenda is meant to be flexible. We can adjust as necessary to meet the needs of the Health Center key staff.

Pre-Site Visit: Team Lead Perspective

- Communication email between Team Lead and CEO regarding documents: **December 2, 2022**

From: Jennifer G. <jagmd2001@yahoo.com>
Sent: Thursday, December 2, 2021 2:34 PM
To: Judith Watson <JWatson@mvnhc.org>
Cc: Kassandra Bonilla <KBonilla@mvnhc.org>; Monique Dumond <moniquedumond@cox.net>; Michelle Layton <michelle@infidiumhs.com>; Guyton-Krishnan Jeanette (HRSA) <jguyton-krishnan@hrsa.gov>
Subject: [EXTERNAL] HRSA OSV Visit Next week

Hi Judith!

I hope you're doing well! We are very excited to complete your OSV virtually next week. I wanted to let you know that I sent over calendar requests for the group meetings and my Admin/Governance meetings. Please feel free to forward and share with the appropriate individuals. If you can please forward the meeting with the Board of Director's to them so they can have them on their calendar.

I also wanted to thank you so much for starting to upload your documents. I went into check, and I saw them there. Thank you so much for your diligence.

Thank you so much!

Have a wonderful day.

Best!

Jenn

Jennifer Genua-McDaniel

HRSA OSV Team Lead

Pre-Site Visit:

Health Center CEO Perspective

1. Describe Mount Vernon Neighborhood Health Center's history, your history at the health center. What was MVNHC doing when COVID hit?
2. When did you find out you were having your OSV?
3. How did you prepare – who was involved within the organization (staff and board)?
4. How did you balance seeing patients – during COVID – while preparing for your OSV and other site visits?

Since 1973, Mount Vernon Neighborhood Health Center, Inc. has been the health care home of thousands of residents in Westchester County, NY.

For many, it is the place to go for high-quality, affordable, and comprehensive health care and supporting services.



Mount Vernon Neighborhood Health Center, circa 1975

Federally-Qualified Health Center with 8 Locations

School-Based Health Centers

- Mount Vernon High School
- Edward Williams Elementary School

Homeless Shelter-Based Health Centers

- Coachman Family Center
- Grasslands Homeless Shelter

and ... 2 Mobile Health Units



Westchester County,
New York

Our Mission

To improve the lives of our community members by providing high quality comprehensive, affordable primary and preventative healthcare.

Our Vision

To offer health and wellness services that will optimize the lives of all members of the community.

MVNHC By the Numbers

20,000+ Registered Patients

130,000+ Annual Visits

8 Locations

2 Mobile Health Units

\$27 Million Annual Budget

277 Employees



Primary Care

- Adolescent Medicine
- Internal Medicine: Adult and Geriatric Care
- OB/GYN
- Pediatric Medicine

Behavioral Health

- Psychotherapy
- Diagnostic Evaluations
- Medication Management
- Supportive Counseling
- Substance Abuse Recovery
- Social Work
- Mental Health Treatment: Children, Adolescents & Adults

Specialty Services

- Audiology
- Cardiology
- Colposcopy
- Dermatology
- Endocrinology
- Gastroenterology
- Infectious Disease
- Nephrology
- Ophthalmology
- Podiatry
- Sonogram
- Ultrasound
- Urology

Dental Care

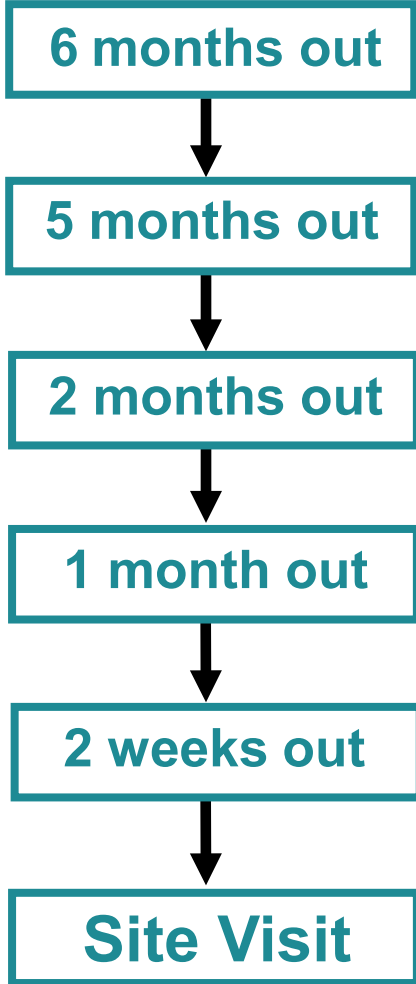
- Care for Adults & Children
- Cleaning/Scaling
- Dentures
- Extractions
- Oral Exam/X-Ray
- Restorative Dentistry

Support Services

- Community Outreach
- COVID Testing & Vaccine
- Discounted Drugs (340B)
- Food Pantry
- Food RX Pharmacy
- Flu Vaccine
- HIV Counseling & Testing
- Insurance Enrollment
- Mobile Health
- Monkeypox Vaccine
- Nutrition Counseling
- NY Project Hope
- On-Site Pharmacy
- Patient Advocacy
- Patient Transportation
- PICHC Program
- Testing Laboratory
- Translation Services
- WIC Program
- X-Ray

Always ... Competing Priorities

- **COVID-19 Pandemic**
- NCQA Patient Centered Medical Home (PCMH) Recertification
- January 2022
- The Joint Commission Survey - March 28-30, 2022
- New York State Department of Health (NYDOH) Bureau of Immunization COVID-19 Site Visit - June 10, 2022
- Federal Tort Claims Act Site Visit - June 14-16, 2022



February 24, 2021 - 1st Notification - Selection of 2 dates in August 2021

March 31 - 2nd Notification - Advised of a Spring Survey due to HRSA Reorganization

October 5 - 3rd Notification - Site visit scheduled for December 8-10

November 1 - Jennifer Genua-McDaniel, Team Lead Resources and Draft agenda provided

November 23 - Pre-OSV Call

December 8-10, 2021



C O U N T D O W N



Time to Prepare

Preparing and Organizing

1. Core Leadership Team read all chapters (together), line by line. Department heads and Board were brought in as applicable (included evenings and weekends)
2. Team Project Manager itemized required documentation and tracked progress using Excel Spreadsheet program
3. Made a list of missing documentation to follow up with respective department heads
4. Reviewed previous OSV report



Preparation Challenges/Opportunities

- In the Throes of the Pandemic
- Historic Baggage
- Corporate Culture (first time, transparency)
- Technical Glitches. HRSA's Technical Assistance Contractor, Management Solutions Consulting Group (MSCG) file sharing platform
- Choreography of Virtual Tour (background signage)

During the Site Visit

Team Lead + Health Center Perspective

Describe your experience and impressions from the:

- First Meeting
- Board Engagement
- Virtual Tour
- Pain Points
- Exit Meeting

During the Site Visit

First Meeting

- Communication via email, phone calls and text (always ask permission to text the HRSA team)
- Collaborative Approach
- Citrix Share File-created sub-folders

Board Engagement

- Participated in Board Discussion and Exit Conference
- Answered questions and provided feedback

Virtual Tour

- From the perspective of a patient
- Completed via Laptop/Tablet
- Check Connectivity
- Privacy Concerns

Exit Meeting

- HC Staff Team, Board Members
- Review Team + Federal Rep
- Clear concise, lasted 1 hour
- CRO Overview

Post-Site Visit

1. What was communication with HRSA like after the Site Visit?
2. Were there items that required attention through the Compliance Resolution Opportunity (CRO) process?
3. Did the OSV lead to any immediate process improvements?

Post-Site Visit

Team Lead Perspective

- Submitted report Sunday December 12, 2021
- Received request for revision Monday December 13, 2021
- Email approval from HRSA Team January 25, 2022



Hello,

This email is to inform you that the TA Report (Tracking no: TA008030) for Mount Vernon Neighborhood Health Center (H80CS00161) has been approved by PQC.

Notification Comments:

PQC concurs with the BPHC Representatives recommendation regarding the HRSA determination

NOTE: This is a system generated message. Please do not respond to this message.



Compliance Resolution Opportunity (CRO) Process

- **Required and Additional Health Services - Element A**
- **Clinical Staffing - Element C, D**
- **Contracts and Sub Awards - Element B, C, D**
- **Financial Management and Accounting Systems - Element C**
- **Billing and Collections - Element I, J**
- **Board Authority - Element D**
- **Board Composition - Element C**

Items Identified as Needing Further Action

Contracts and Sub Awards

- *Element B Records of Procurement Actions*
- *5.1 Rationale for the Procurement Method*
- *5.2 Selection of Contract Type*
- *5.3 Contractor Selection or Rejection*
- *5.4 Basis for the Contract Price*



Instituting a New HRSA-Compliant Policy and Procedure

**MOUNT VERNON NEIGHBORHOOD HEALTH CENTER
Purchase Order Oversight Checklist.**

- Product Being Purchased-:
- Purchase Order Value-:
- Purchase Awardee -:
- Reason for Purchase-:
- Is this Purchase resultant of a Federal Grant -:
- Purchase Order # -:

Contract	
Description	
Federal/Non-Federal Funds:	
5.1 Rationale for the procurement method?	
5.2 Selection of contract type?	
5.3 Contractor selection or rejection?	
5.4 Basis for the contract price?	

Blank Oversight Checklist to accompany all purchase orders over \$25,000

**MOUNT VERNON NEIGHBORHOOD HEALTH CENTER
Purchase Order Oversight Checklist.**

- Product Being Purchased-: Phillips Ultrasound System
- Purchase Order Value-: \$250,418.50
- Purchase Awardee -: Phillips Healthcare
- Reason for Purchase-: Equipment Replacement
- Is this Purchase resultant of a Federal Grant -: Yes
- Purchase Order # -: 18709

Contract	CBECSC8ECS4498-01-00
Description	American Rescue Plan
Federal/Non-Federal Funds:	Federal
5.1 Rationale for the procurement method?	<ol style="list-style-type: none"> 1. Purchase Order Value in excess of \$25,000.00. 2. Department Procedure requires this format for Purchase Approval. 3. This procurement requires the signature approval by the CFO, COO and CEO.
5.2 Selection of contract type?	<ol style="list-style-type: none"> 1. This procurement requires the obtainment of Three competitive Bids for product being purchased. <p>Competitive Bids attached are: (a) Phillips Healthcare - \$250,418.50. (b) Neurologica (Samsung) - \$379,527.35. (c) USC Ultrasound - \$243,000.00.</p>
5.3 Contractor selection or rejection?	The Director of Materials recommends the selection of Vendor – Phillips Healthcare for this purchase.
5.4 Basis for the contract price?	<ol style="list-style-type: none"> 1. Product Familiarity. - This organization has been using this type of product for past 10 years and familiar with its operation. 2. Product Delivery - Vendor has committed to a delivery date of 30 days. Other vendors have committed to 60 days or beyond. 3. Pricing – Best competitive pricing overall. 4. Product Quality & Warranty. – Product quality and warranty is best being offered. Far exceeds other vendors.

Oversight Checklist accompanying an actual purchase order

Instituting a New HRSA-Compliant Policy and Procedure

Who	Item/Service	Bids	Recommendations	HRSA Funded?	Other Funding Sources
		1. 2. 3.			

Board Approval Checklist Accompanying All Contracts, Memorandum of Understanding (MOU), Letters of Agreement, Statement of Work (SOW), Payments, etc - \$25,000 or higher

Resources Provided By Reviewers

- Emergency Care Research Institute (ECRI)
- Exit Conference Tracking Resource
- Executive Session Guidelines
- Numerous Policies and Procedures (includes Board)
- Board Member Application Template
- HRSA Compliance Manual and Site Visit Protocol currently utilized for orientation and training
- HRSA Team/CEO Consult Session

Promising Practices: Preparing for Continuous Compliance

- Health Center Program Requirements are the essence of an organization
 - Make it part of the health center's culture to know what role federal funds play in your organization
 - Do employees know why it's important to attempt to collect fees when a patient is seen?
 - Do all employees know that the Sliding Fee Discount Program is for ALL regardless of payor
 - Do employees know why it's important to make sure blood pressures are taken correctly and how it relates to quality?
- Requirements are the foundation not the ceiling
 - “Do I HAVE to do something?”
 - A health center agrees to be compliant with Health Center Program requirements
 - Health Centers are providers of choice in their communities

Promising Practices: Preparing for Continuous Compliance

- Getting “a perfect score” IS NOT REFLECTIVE of the quality of care provided to patients
 - There is NO perfect score!
 - Most areas of non-compliance are related to documentation
 - Ensure care provided to patients is high quality, making a difference and evaluate quality measures
- One Health Center is One Health Center
 - Comparison between health centers may not be useful if you don't compare based on same size and complexity
 - How the requirements are implemented are the responsibility of the health center; as long as the health center MEETS the requirements
 - Utilize resources such as your local PCA, HRSA Point of Contact and NACHC resources

QUESTIONS?



THANK
YOU!



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