

Requests for Facility Access from Agents of Outside Entities to Interact with Patients in the Dialysis Centers 6.13.2022 V2.0

GOAL: provide guidance to FKC staff to address requests from certain third-party agents of outside entities to visit a patient at an FKC facility while protecting patient confidentiality & minimizing disruption of patient care

Background

- To improve coordination of care for FKC dialysis patients, FKC permits **Agents** to see patients at the dialysis facility for purposes of facilitating care coordination and/or engaging in case management services for patients in common.

Third-party Agents

- An employee, contractor, or other representative of a healthcare related entity, such as a physician group, value-based care organization, Kidney Care Entity, or other similar organization
- Are always non-FKC employees and may be employees of Kidney Care Exchanges (KCE) or physician practices
- Are permitted to access FKC dialysis clinics to provide case management, care coordination services or other non-dialysis related care to FKC patients with whom they have an established relationship
- Must never supplant the activities or role of any of the ESRD IDT care teams
- An Agent may be, but is not limited to: RN, LPN, LVN, RD, MSW, BSW, MA, or APPs
- An Agent **does not** include:
 - ✓ Employees, contractors or agents of FMCNA or its subsidiaries. ✓ Medical/Clinical students, interns, or volunteers.
 - ✓ Renal Fellows admitted as Limited Medical Staff Members ✓ Health Plan Case Managers acting under the Health Plan Case Manager Access to FKC Facilities policy ✓ Health providers admitted as Affiliated Health Staff Members
 - ✓ APPs admitted as Limited Medical Staff Members when providing clinical care to ESRD patients as an agent of an Active Medical Staff Member. See policy: Role and Expectation of the Advanced Practitioner.
 - An APP who wishes to provide **only** value-based care coordination or case management services on behalf of a physician group, a value-based care organization, a Kidney Care Entity, or other similar organization must seek authorization as an Agent under this policy whether he/she is also admitted as a Limited Medical Staff Member at the same facility.

What is required prior to Agent accessing an FKC Facility?

- Apply for Authorization Email: ClinicAccess@freseniusmedicalcare.com
- Completion annually:**
 - ✓ Infection control training ✓ Compliance Training and Privacy/Information Security
 - ✓ Attestation of having reviewed all applicable FKC infection control policies and procedures
 - ✓ Confirmation that the Agent is not on the OIG list of Excluded Individuals/Entities (LEIE), sanctioned through the Office of Foreign Assets Control (OFAC), excluded, or suspended from a Medicaid program, or otherwise excluded from participation in Federal healthcare programs.
 - ✓ State licensure (where applicable). ✓ Adequate professional liability insurance coverage and/or comprehensive general liability insurance coverage as determined by the Governing Body
 - ✓ Fully vaccinated status for COVID-19 or clearance for medical exemption, in accordance with current FKC policies
- Governing Body (GB) Approval for each FKC dialysis unit that the Agent will access**

Scheduling and Fees

- Scheduling Requests** and coordination must be at least 10 days in advance of clinic visits
 - ✓ DO and CM will be provided with a weekly list of Agents who have been scheduled for visits within the FKC dialysis unit, and patients who are scheduled to be seen
- Agents are not allowed to visit without coordination of an advance appointment
- Agents are not allowed to visit a clinic more than 5x/month
- It is within the sole discretion of FKC to impose **reasonable authorization fees** to cover the administration and other expenses of processing Agent authorization applications
- All Agent scheduling and information regarding Agent authorization or scheduling fees may be obtained by emailing: ClinicAccess@freseniusmedicalcare.com

What happens during clinic visits?

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| <ul style="list-style-type: none"> <input type="checkbox"/> Each time an Agent arrives at a clinic to meet with patients, the Agent must: | <ol style="list-style-type: none"> 1. Check in with the Clinical Manager and/or Charge Nurse prior to entering the treatment area 2. Provide a list of patients that the Agent plans to visit 3. Always wear an identification badge with the Agent's name and employer while in the facility 4. Respect every patient's right to refuse to be seen. |
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What happens during clinic visits? (cont.)

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| <input type="checkbox"/> Prior to admitting an Agent to the dialysis treatment floor or home therapy, CM or designee will verify: | <ol style="list-style-type: none">1. The agent has been approved by the GB and is authorized to enter the FKC clinics2. The Agent wears an identification badge.3. The list of patents identified by the Agent includes only patients with whom the Agent and any entity the Agent represents has an established relationship, and ensure the Agent only engages with those patients.4. The patient consents to the visit. The Agent is not allowed to see any patient who refuses.5. Ensure that the Agent follows all infection control policies and requirements for PPE. |
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Activities Agents May Perform

- Patient Evaluation:** including medical history, medication review and reconciliation, and health assessment.
- Patient Education:** based upon patient needs/request, and in addition to new patient education already provided by FKC staff in the dialysis clinic. The Agent may provide education regarding:
 - ✓ Permanent Access
 - ✓ Fluid and Diet restrictions
 - ✓ Home therapies and transplant
 - ✓ Advanced care planning, palliative care, or hospice
 - ✓ Other treatments deemed appropriate
 - ✓ Co-Morbid Diagnoses and Treatments
 - ✓ Other identified patient knowledge deficits impacting quality of patient care and optimal health outcomes.
- Coordination of Services:**
 - ✓ Scheduling patient appointments with other care providers, including vascular access specialists, primary care providers, behavioral health providers and other health specialists
 - ✓ Advocacy for options and services to meet the patient's health needs through communication and available resources to promote quality cost effective outcomes
 - ✓ Assist with the navigation of the health care system to achieve successful care, including identification and resolution of gaps in needed services and coordination of needed services, including:
 - Transitions of Care
 - Home Health Care
 - Aide Services
 - Transportation
 - Management of Co-Morbid Diagnoses
 - Address social determinants of health

Activities an Agent May NOT Perform

- Perform any dialysis related treatment or services for FKC patients.
- Provide any services that would be billable to any payor.
- Attend FKC patient plan of care meetings, facility QAI, or Governing Body meetings.
- Meet with or solicit any FKC patients or FKC staff members who do not already have an established relationship with Agent or Agent's employer.
- Direct the activities of, or to place workload upon, the FKC clinic care team.
- Solicit any facility staff with respect to employment outside of FKC.
- Solicit patients to change care providers.
- Prescribe treatment or provide any orders, relay physician orders, or take telephone orders, and may only make recommendations to the attending physician/extender who is responsible for writing any orders based on the Agent's recommendation, if within the Agent's scope of practice.
- Access or document directly into eCube Clinicals or other FKC Clinical Records.

Documentation and Communication

- Copies of all patient assessments and findings must be provided to the Clinical Manager or designee.
- Clinical Manager or designee are responsible to file paper assessments and other pertinent medical information in the patient's paper medical record and/or scanned into Document Manager.
- Agents should communicate with FKC staff, providers, and nurses as to relevant issues or pertinent clinical findings prior to leaving the facility.

Agent Visits

- Agents are not allowed in the treatment area during the patient's treatment initiation or termination, or when dialysis facility management believes Agent's presence may be inappropriate for the patient or disruptive to the operation of the facility.
- Visits will only take place chairside during a treatment, and Agents are not to otherwise utilize dialysis facility separate space, including conference rooms or office space for appointments or meetings with FKC patients.
- Agents will only be allowed in person FKC dialysis clinic visits. FKC staff will not facilitate telehealth visits between Agents and patients while they are treating at FKC dialysis facilities.
- Agents must follow all clinic policies, including FKC infection control, influenza and COVID policies that include information on appropriate personal protective equipment, requirements for proof of vaccinations, and COVID screening procedures.
- The Agent must coordinate all care coordination activities directly with the patient and/or nephrologist, and FKC staff are not responsible to implement any care coordination activities or other recommendations of the Agent.**
- Failure to comply with the terms of this policy may result in exclusion of Agent from FKC facilities.**