

Rate Setting

Stages

Annual Filing Modernization Project Clinician Supplemental Schedule

Clinician Cost

considered in

Rate-Setting

Policv

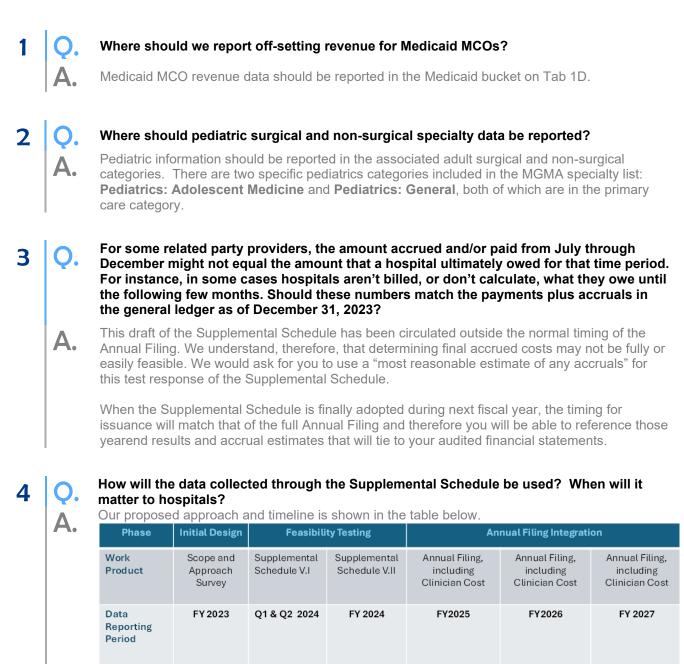
First possible

effect on GBR

Rates seen

FREQUENTLY ASKED QUESTIONS

(as of July 2024)



Submitted Clinician Cost data not considered in

any GBR Rate-setting Analysis

CLINICIAN SUPPLEMENTAL SCHEDULE – FAQs

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Α.

Is the scope of the Schedule to only capture clinician costs that are reported in each entity's Annual Filing? Example: An organization employs clinicians throughout the health system. Some clinicians are directly employed by the hospital while others are community providers that are subsidized by the hospital. In addition, there are clinicians employed at the system level that don't directly financially impact any rate regulated entity. How would the HSCRC like this information reported in the Schedule?

The scope of the clinician cost supplemental schedule is NOT limited to only those clinician costs that are currently reported in the annual filing. The scope of the schedule is to capture ALL clinician (physicians and advanced practice providers) costs for which the hospital is financially responsible.

There are three primary tabs (1a, 1b, and 1c) which cover the basic business relationships between the hospitals and clinicians.

- 1. Tab 1A Clinicians Employed by Hospital in the workbook is for reporting clinician costs for providers employed by the hospital
- 2. Tab 1B Independent Clinicians/Clinician Groups Contracted by Hospital
- 3. Tab 1C Clinicians/Clinician Groups Contracted via Related Party Entity (RPE)

Tabs 1B and 1C may contain direct payments as well as payments to contracted clinicians whose Part B reimbursements are supplemented by the hospital as subsidies or stipends Additionally, Tab 2 contains hospital administration costs. Most, if not all, of these costs may be reported in a hospital's annual filing.

To the extent that payments to clinicians by related entities are made in connection with hospital services or service to hospital patients, they would fall under the scope of the Supplemental Schedule (Tab 1C). To the extent that the hospital is obligated to fund system management fees or allocations which include related entity payments to clinicians, that portion of the management fee or allocation payment related to payments to physicians would also be within the scope of the Clinician Cost Supplemental Schedule (Tab 1C).

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What is the purpose of 'C. Schedule 2 Admin'?

The intended purpose of 'C. Schedule 2 Admin' in the supplemental schedule is to collect data for both the time spent/designated and the associated compensation related to each hospital's use of Clinicians who serve in Hospital-wide management and administrative roles. This use of Clinicians is distinguished from Departmental Admin and Supervision roles covered in C. Schedules 1A, 1B, and 1C.

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Α.

Can the HSCRC provide an example of how to report information between Schedules 1A, 1B, and 1C and Schedule 2 Admin?

Let's use the example where a hospital has a CMO who is a board-certified immunologist. This CMO does not see patients and their salary is paid directly by the hospital. The FTEs and compensation associated with the time spent practicing as an immunologist would be reported on C. Schedule 1A row 8 in Columns E and K, respectively.

For C Schedule 2 Admin, the hospital should report that it has a CMO that is employed by the hospital (Column A) and the FTEs and compensation associated with the time spent as the CMO should be reported in Columns D and E, respectively.

In this case, the Clinician is not seeing patients so their FTEs and compensation should be reported on C Schedule 2 Admin. For Clinicians who split their time between seeing patients and hospital administration, the FTEs and compensation should be allocated to each appropriate

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schedule. If the FTEs and compensation for hospital administration cannot be separately identified, the FTEs and compensation on C Schedule 2 Admin should be reported as 0.

The combined reporting of FTEs and compensation between C Schedules 1A and 2 Admin should equal the immunologist's total FTE and compensation.