

Physician Practice Reactivation

Financial planning amidst uncertainty

Presented by

Nate Gagne, MBA, NEQCA

Courtney Pasay, Esq., Lowell General PHO

Guest panelist Jessica Schachter Jewell, Nixon Peabody

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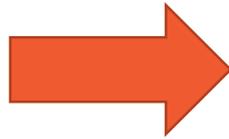
A program of the
Wellforce Private Practice Financial Sustainability Work Group
Dr. Michael Wagner, Chief Physician Executive



Featured Panelists

- Nate Gagne, MBA, Chief Financial Officer, NEQCA – ngagne@neqca.org
- Courtney Pasay, Esq. Contracting, Compliance, and Regulatory Affairs, Lowell General PHO – Courtney.Pasay@lowellgeneral.org
- Jessica Schachter Jewell, Associate, Nixon Peabody, jsjewell@nixonpeabody.com

Agenda



- Stimulus Updates
- Massachusetts Reopening Updates
- Practice Reactivation –
Human Resource Considerations
- Human Resources Q&A
- **Additional Q&A**

Federal Update

1

HEROES Act (May 15):

Senate left town for a 10-day recess last Thursday without taking up any coronavirus relief legislation. Discussions could begin next month.

2

HHS Provider Relief Fund Disbursements:

HHS announced nearly \$4.9B distribution to SNFs affected by COVID-19. HHS will make distributions to SNFs based on both a fixed basis and variable basis.

HHS began distributing \$500M in funds to tribal Providers: hospitals, clinics and urban programs.

3

HHS Provider Relief Fund Administrative Update:

Providers have until June 3 to accept the Terms and Conditions and submit revenue info to support receiving an additional payment.

May 22 HHS announced a 45-day extension for providers to attest to funds received from the Provider Relief Fund.

4

Operation Warp Speed: A collaboration between HHS and AstraZeneca is projected to make available 300 million doses of a COVID-19 vaccine, the first of which could be available as early as October.

5

PPP Flexibility Act (H.R. 6886):

Legislation introduced in the House last week that would enhance the Payroll Protection Program.

DPH Guidance for Healthcare Provider Reopen Approach

- DPH provided updated guidance on May 25, for Healthcare Providers (non-acute care facilities) to reopen in Phase I
- Providers must maintain a signed attestation and make it available upon request of DPH at any time (does not need to be submitted to DPH).
- Providers must maintain written policies and protocols that incorporate or exceed the standards outlined in this guidance for
 - Personal Protective Equipment and other essential supplies
 - Workplace Safety
 - Patient Safety
 - Infection Control
- Please find copies of guidance, attestation, and template policies and protocols on NEQCA website at <https://www.neqca.org/Newsroom/COVID-19>

Healthcare Best Practices

1

Create a Culture of Open Communication and Compliance:

Communicate to your employees that your organization takes employee welfare and safety seriously. Document and share proactive measures that you are taking to address employees' concerns.

2

Establish or Ensure Internal Compliance Protocols:

Evaluate your internal compliance protocols and determine if additional protocols are necessary to deal with employees' concerns related to COVID-19.

3

Be Transparent and Consistent:

Update your HR policies in response to COVID-19 and be sure to document and communicate those updates with your employees.

4

Talk to your Attorney:

The COVID-19 situation raises new considerations and questions for all healthcare organizations. Make sure you understand your rights and duties as an employer.

Human Resources Q & A

What legal obligations do practices have in June and beyond if staff are unable to work full time?

Telehealth is used when available, but are there any legal guidelines we must follow for those who employees who continue to have daycare issues?

What about for those who may be exposed to COVID 19 and who may need to be quarantined for 2 weeks?

Staff are allowed to use any sick/personal or vacation time, but are there any requirements to offer telework for the same full time hours/any hours when they are unable to be on site?

Human Resources Q & A

What are the legal obligations of a medical practice with regards to FFCRA leave?

Are all private medical practices exempt as essential business?

Human Resources Q & A

Should it be necessary to decrease staff hours down the road, are there any implications/risk to PPP after the 8 week loan time frame?

Is there an alternative accommodation the practice should be offering?

Human Resources Q & A

Are there any COVID 19 Control Plan templates available to meet state law requirements?

While COVID training/protocol are in place, is there a formal training/certificate needed for proof?

What posters are required to meet OSHA guidelines?

Human Resources Q & A

Going forward, is there any specific paperwork/documents practices need to keep on file for staff who may have been exposed/had COVID19 beyond the negative testing results/documentation needed before returning to work?

Human Resources Q & A

Is there any legality in highly encouraging our staff to abide by safety recommendations, meaning if they continue to expose themselves in the outside world, what is our obligation to make accommodations?

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