

Off-Campus Emergency Departments

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June 27, 2024



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ABOUT DPBH

MISSION

To protect, promote, and improve the physical and behavioral health and safety of all people in Nevada, equitably and regardless of circumstances, so they can live their safest, longest, healthiest, and happiest life.

VISION

A Nevada where preventable health and safety issues no longer impact the opportunity for all people to live life in the best possible health.

PURPOSE

To make everyone's life healthier, happier, longer, and safer.



ALL IN GOOD HEALTH.

AGENDA

1. Discuss statutory authority for off-campus EDs
2. Provide overview of regulations for off-campus EDs
3. Explain the difference between an urgent/quick care clinic, an independent center for emergency medical care (ICE) and an off-campus ED
4. Provide overview of the licensing process for off-campus EDs
5. Provide information regarding the total number of off-campus EDs and pending applications



'Off-campus location'

Each off-campus location of a hospital must obtain a unique National Provider Identifier (NPI) distinct from the NPI used by the main campus. A definition is also provided in this section as follows:

“Off-campus location” means a facility:

- With operations that are directly or indirectly owned or controlled by, in whole or in part, a hospital or which is affiliated with a hospital, regardless of whether it is operated by the same governing body as the hospital;
- That is located more than 250 yards from the main campus of the hospital;
- That provides services which are organizationally and functionally integrated with the hospital; and
- That is an outpatient facility providing ambulatory surgery, urgent care or emergency room services.

(Nevada Revised Statutes Ch. 449.1818, added to NRS in 2019)

Hospital Outpatient Services



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Regulations (in part) indicate the following standards for outpatient services:

- Services in accordance with national standards.
- Integrated with inpatient services.
- Sufficient personnel available to provide services.
- Equipment and supplies necessary to meet anticipated needs.
- Laboratory, radiology and pharmaceutical services must be readily available to the outpatient unit.

(Nevada Administrative Code Ch. 449.370)

Urgent/Quick Care and ICE



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- Urgent, or “quick care,” clinics are not regulated as health care facilities by HCQC. Much like physician clinics, HCQC doesn’t have licensure authority in these clinics. The local municipality is responsible for business licensing and the medical professionals are regulated by their licensing boards. While these entities may occasionally be associated with hospitals, they are not subject to EMTALA rules because they are not required to be integrated with hospital services and are not considered part of a hospital’s emergency services. These facilities may set their hours of operation.
- Independent centers for emergency medical care (ICE) are specifically defined in NRS Ch. 449 as; “a facility, structurally separate and distinct from a hospital, which provides limited services for the treatment of a medical emergency” and NAC 449.61302 restricts licensure to “facilities located more than 30 minutes by ground transportation from a facility which is licensed to provide a higher level of emergency medical care.” There is only one licensed ICE currently in Nevada. ICEs are also not subject to EMTALA rules because they are distinct facilities, licensed separately from the hospital. These facilities may set their hours of operation. These facilities are state licensed only, there are no federal certification standards.

Urgent Care, ICE, Off-Campus ED, --- Hospital-Based ED



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There are several different types of facilities that can confuse a health care consumer. Some are regulated as health care facilities and others are not. Some must comply with EMTALA requirements for emergency medical care, others do not. Some are 24/7 operations, others are not. Some have federal certification standards as well as licensure standards, others only have licensure standards. These differences may appear subtle, whereas the billing, insurance acceptance and moreover consequences of arriving at a facility that cannot provide necessary services can be devastating.

Licensure of Off-Campus EDs



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For our purposes today, the licensure process for off-campus EDs can be described as follows:

- The hospital must submit an application for an endorsement to add an off-campus ED and fulfill documentary requirements for proper licensure.
- Along with the endorsement application the hospital must submit construction plans for the off-campus ED.
- Once the application is complete and all construction is complete, HCQC will conduct an onsite inspection to determine compliance.
- When it is determined the off-campus ED is in substantial compliance with regulatory requirements, the location will be added as an endorsement to the hospital license

Off-campus EDs must meet the 2022 Federal Guidelines Institute (FGI), Guidelines for Design and Construction of Outpatient Facilities, Section 2.8, Specific Requirements for Freestanding Emergency Care Facilities.



Currently Licensed Off-Campus EDs

Currently 8 hospitals have off-campus ED endorsements on their license, some include multiple endorsements, for a total of 14 off-campus EDs, as follows:

- Northern Nevada Sierra Medical Center (1 remote ED)
- Southern Hills Hospital And Medical Center (2 remote EDs)
- Spring Valley Hospital Medical Center (1 remote ED)
- Centennial Hills Hospital Medical Center (2 remote EDs)
- Mountainview Hospital (2 remote EDs)
- Northern Nevada Medical Center (2 remote EDs)
- Valley Hospital Medical Center (3 remote EDs)
- Henderson Hospital (1 remote ED)



Pending Applications for Off-Campus EDs

Currently HCQC has 6 pending applications for off-campus ED endorsements, as follows:

- Summerlin Hospital Medical Center
- Henderson Hospital
- Northern Nevada Medical Center
- Renown Regional Medical Center
- Southern Hills Hospital and Medical Center
- Sunrise Hospital and Medical Center

QUESTIONS?



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ACRONYMS

- ED – Emergency Department
- HCQC – Bureau of Health Care Quality and Compliance
- CMS – Centers for Medicare and Medicaid Services



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