



Strength in Numbers

■ LAUREL STOIMENOFF, PT, CHC

We have heard some regulators express concerns that urgent care centers are unregulated, despite the fact that urgent care centers are subject to a myriad of regulatory and compliance mandates.

Our centers are subject to regulations from the DEA, CLIA, radiology boards, and individual licensing agencies. Additionally, the centers must be concerned about federal regulations related to fraud and abuse, safeguarding against kickbacks, patient inducement, self-referral, and a relatively new requirement from the Centers for Medicare and Medicaid Services (CMS) that physician offices have an internal compliance and ethics program if they elect to participate in Medicare and Medicaid programs. Centers are also subject to regulations defined by the Department of Labor and the Fair Labor Standards Act (FLSA). There are privacy and security regulations (HIPAA) regulated by the Office of Civil Rights, and regulations around document retention, reportable diseases, reporting child/elder abuse, timeliness of response to medical record requests, needle sticks, and animal bites.

Your payers may each establish separate and disparate criteria to secure in-network status. And now centers may suffer ongoing erosion in reimbursement—despite escalating costs—if they fail to report in accordance with CMS’s quality criteria, which are more aligned with longitudinal care and wellness, vs episodic illness and injury.

This list is hardly exhaustive, and the regulatory and compliance environment can be so overwhelming that it simply becomes “noise.” The operator’s principal goal each day is to provide good care to patients, so the temptation is to simply default to the original doctrine of, “above all, do no harm” and ignore the rest. While a *back-to-basics* approach may seem alluring, it is ill advised; recent history tells us that the environment is likely to grow increasingly complex, and that complexity is often tied to financial viability in the form of either carrots or sticks. Even the most sophisticated operators will need the

support of experts and colleagues to navigate the ongoing challenges of providing care to those who cross our threshold, whether physically or virtually.

The majority of these new or morphing regulations are not exclusive to urgent care, and many may not consider the nuances of the services we provide. So, how should we collectively respond to support each other and credibly advocate for the valued service we provide?

We Need to Hear From You

UCAOA board members, staff members, and committee volunteers have typically been involved one way or another in the day-to-day delivery of urgent care medicine, but we need to hear from all our members to ensure our finite resources are being deployed where they are most impactful and meaningful to you. There are so many ways to have a voice in the Association: Join us as a committee member, nominate yourself or a colleague for the Board of Directors, participate in the benchmarking survey, or respond to a call for speakers, to name just a few.

Share the Value of Membership

Advocacy efforts require the voices of many. This includes the ranks of our individual members, our member centers, and our vendors. When facing regulators and policymakers, we consistently quote our membership numbers—the many whose voices we represent. Center membership affords each center the opportunity to provide membership to *up to 10* individuals per center, yet many don’t take advantage of this benefit, or they leverage association membership as an employee benefit. Once registered, these individuals have full member benefits, and UCAOA’s advocacy efforts are strengthened by their inclusion. UCAOA will continue to advocate passionately at every level to ensure an environment conducive to ongoing growth and ready access to care. But, rest assured, there is real strength in numbers.

As 2017 begins, we thank you for your involvement in urgent care medicine and UCAOA. There may be no more vital time in our short, but explosive, evolution to come together. UCAOA’s foundation is its members. It is a solid and strong base. We must continue to build upon it and ensure the voice of urgent care medicine is heard. ■



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