

UNIVERSITY OF COLORADO SCHOOL OF MEDICINE
Sites of Practice Policy

The goal of the University of Colorado Faculty is the practice of comprehensive patient care in an environment permitting optimal clinical, research and educational opportunities for patients, students, residents and faculty. The purpose of the Sites of Practice (SOP) Committee is to assure that specialists performing services to an off-site facility are covered by governmental immunity and insured by the University of Colorado Risk Trust.

Request Procedure for Off-Site Practice

1. An initial request is submitted to the Chair of the Sites of Practice Committee on an application form made available by the CU Medicine Department of Business Development and Planning (BDP). The Committee reviews the initial request and may take one of the following actions:
 - a. *Approve the proposed site of practice from the initial request.* Should the Committee approve the sites of practice request from the initial request, the Committee Chair, through BDP, shall email approval to the Requestor, formally designating the approved site of practice; the Committee will also send the application the Dean of the School of Medicine for signature and information purposes.
 - b. *Request additional information from the Requestor.* The Committee Chair, through BDP, shall request additional information by sending an email to the Requestor.
 - c. *Disapprove request.* The Committee Chair, through BDP, shall email the Requestor indicating the reason for the disapproval of the request.
2. Applications referred to the Sites of Practice Committee by the Requestor are submitted to the Committee Members a minimum of one week prior to the Sites of Practice Committee Meetings. Committee Members review the request/application and forward their recommendation for approval or disapproval to the Dean of the School of Medicine. The Dean signs the request and returns to the Committee Chair.
3. A list of designations, approvals, and denials will be retained by the CU Medicine Business Development and Planning department.

UNIVERSITY OF COLORADO SCHOOL OF MEDICINE
Policy and Procedure for the
Approval of Clinical Sites of Practice

Principles Underlying the Approval of a Non-University of Colorado School of Medicine Clinical Practice Site

The primary missions of the School of Medicine involve both the education of students/residents and the advancement of medical knowledge through ongoing basic and clinic research. To this end, it is imperative that students, residents and members of the faculty have full access to patients with a wide array of clinical problems and diseases that can benefit from the expertise of the wide array of clinical specialties and sub-specialties including those specialties which are hospital based, e.g., pathology, radiology and anesthesiology.

Therefore, all non-University of Colorado School of Medicine clinical practice sites must enhance the academic infrastructure of the School of Medicine including serving as potential sites for student and resident placement and as sites of referral of patients into the multi-disciplinary faculty teaching services at University Colorado Hospital and Children's Hospital Colorado. These sites must be operated in a manner that will minimize the diversion of patients from these teaching institutions.

Requirements to be met before a non-University of Colorado School of Medicine Site of Practice is initially approved or is reapproved at its annual review. (Does not apply to ad hoc consultations).

1. Except where permitted through an institutional affiliation agreement with the School of Medicine*, the site of practice will not function, or be advertised, as a Center of Excellence, but instead will operate as a program or service extension of the Anschutz Medical Campus.
2. To insure adherence to this requirement, institutions providing space or support for a CU Medicine site of practice will be advised in writing:
 - a) that the institution is not permitted to contract for, or include in contract negotiations, the professional services provided by a CU Medicine physician; and
 - b) that the institution is not permitted to use the name of the faculty physician or faculty service for marketing or advertising purposes.
3. All CU Medicine physicians providing services at a non-University of Colorado School of Medicine site of practice within the State of Colorado must have signed a non-compete agreement prior to the approval or re-approval of the practice site. The terms of the non-compete agreement must have the concurrence of the Department Chair, the Dean of the School of Medicine and the Medical Director of CU Medicine. The purpose of the non-compete clause is to protect to the maximum degree the teaching and research patient base of the University.
4. All CU Medicine physicians providing services at a site of practice located within the standard metropolitan Denver area must sign an agreement permitting

CU Medicine access to their off-site medical records. NOTE: This agreement does not give CU Medicine access to the medical records owned by other institutions. The purpose of chart access is to permit CU Medicine to audit these off-site charts for quality of care and, if questions arise, for referral source.

5. CU Medicine will report billings and actual collections by site of care for all physicians working in non-University of Colorado School of Medicine sites of practice. To maintain approval to work in a metropolitan Denver site of practice, physicians must generate 75 percent or more of their annual collections from their UCH or CHCO based patient care activities. Semi-annual analysis of the impact of potentially competing sites on UCH/CHCO services will be considered in maintaining site approval.

*NOTE: Faculty programs specifically addressed in an institutional affiliation agreement with the School of Medicine, or in an approved CU Medicine faculty service agreement, are exempted from these requirements, e.g., Health One/Rose/Swedish Family Medicine Training Programs; etc.

Rationale for establishing Non-University of Colorado School of Medicine Sites of Clinical Practice

CU Medicine must establish off campus sites of service if the University of Colorado School of Medicine is to gain access to teaching referrals from non-University of Colorado School of Medicine physicians, many of whom are contracted with provider service networks (PCNs) and independent practice associations (IPAs). These private practice organizations are increasingly assuming financial risk from third party payers and are extremely hesitant to refer out of their network unless so advised by a physician known to, and trusted by, the referring physician or the leadership of the PCN. Such trust is most easily achieved by working on site within these organizations. In a growing era of managed care, strict constraints on patient access, establishing and maintaining close relationships with these referral sources is vital to the educational and research missions of the University of Colorado School of Medicine.

Many third party payers, although contracted with CU Medicine/UCH/CHCO, retain preferred provider arrangements with non-University of Colorado School of Medicine providers. These formal and informal agreements direct noncomplex and non-tertiary referrals away from the University of Colorado School of Medicine teaching services and faculty physicians. Providing CU Medicine physician services at non-University of Colorado School of Medicine sites of practice have consistently demonstrated that such preferred provider arrangements are then expanded to include CU Medicine on site physicians, thereby providing an opportunity to involve such patients in the academic programs of the University of Colorado School of Medicine when the need for a higher level of care is identified. Again, such relationships provide an opportunity for trust and understanding to be developed between third party payers and University of Colorado School of Medicine health care services.

University of Colorado School of Medicine is the leading medical research institution in the region. However, some research grants may require more patients than can be generated through UCH/CHCO facilities and services. Access to additional patients through approved sites of practice can be essential if University of Colorado School of Medicine is to maintain its strong research capabilities, including the indirect overhead generated through these grants.