

Virtual Facility Site Review Attestation

This communication applies to the Medicaid and Medicare-Medicaid Plan (MMP) programs for Anthem Blue Cross (Anthem).

Provider/clinic name:	
Location address:	

Pursuant to *Department of Health Care Services (DHCS) All Plan Letter 20-011: Governor’s Executive Order N-55 in Response to Covid-19*, DHCS continues to respond to concerns and changing circumstances resulting from the COVID-19 pandemic. DHCS is allowing managed care plans (MCPs) to explore alternatives to in-person site reviews, such as site reviews that are conducted virtually. However, DHCS may require MCPs to complete follow-up on-site reviews under future guidance, as allowable.

Your Facility Site Review (FSR) and Medical Record Review (MRR) are now due. Please choose one of the options below to meet the FSR and MRR requirements.

Virtual FSR (Option 1)

Provider clinic agrees to have Anthem conduct a full scope virtual FSR/MRR at the clinic address above within 30 days and agrees to have the following minimum requirements in place to complete the virtual FSR process:

1. Facility Site Review (approximately 2 to 4 hours):
 - a. Ensure designated staff are available to walk through the clinic and answer interview questions.
 - b. Provider must have access to both a smartphone/tablet/laptop camera and audio connection with a certified site reviewer via an application (for example, FaceTime, Google Duo, etc.) or video-based program (WebEx, Skype, Microsoft Teams, etc.). Provider must have a backup unit readily available and charged in the event of a battery failure.
 - c. Ensure staff can take photos free of any members/patients in compliance with all *HIPAA* requirements, as needed.
 - d. All areas of the clinic will be accessible to the reviewer to view through the camera (including locked areas) at the time of the audit.
2. MRR (approximately 3 to 4 hours for every 10 medical records reviewed):
 - a. Provider shall have electronic medical record (EMR) systems accessible remotely via remote login access or via screen-sharing video-based programs (WebEx, Skype, Microsoft Teams, etc.) in compliance with all *HIPAA* requirements.
 - b. Designated staff must be available to assist in navigating through the electronic medical record system, as needed. This offers a great educational opportunity for the staff.
3. Provider/clinic will pass the virtual FSR/MRR with a minimum score of 80%.
4. Review must be conducted in compliance with the [Centers for Disease Control COVID-19 Guidelines](#).

On-site and interim FSR (Option 2)

Provider clinic agrees to complete an interim FSR self-assessment within 10 calendar days of this signed attestation and have Anthem conduct a full scope on-site FSR/MRR at the clinic address above **after** the public health emergency has ended and it is safe to do so.

Provider clinic hereby declines the offer for a virtual FSR/MRR at this time for the following reasons (Please check all that apply.):

- Lack of staffing resources to accommodate a virtual review
 - Lack or decrease in clinic hours to accommodate a virtual review
 - Lack of equipment (smartphone, internet access) to facilitate a virtual review
 - Limited or no remote access to medical records (paper charts, no EMR access) for reviewer
 - Other:
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Provider clinic understands they will need to conduct their own interim FSR self-assessment of their clinic/back office and will submit this form along with the supporting documents to their assigned Anthem reviewer within 10 calendar days of this signed attestation.

Background

Pursuant to the DHCS *All Plan Letter 20-006 Site Reviews: Facility Site Review and Medical Record Review (Formerly Policy Letter 14-004)*:

State law requires MCP to have adequate facilities and service site locations available to meet contractual requirements for the delivery of primary care within their service areas. All Primary Care Provider (PCP) sites must have the capacity to support the safe and effective provision of primary care services. To ensure compliance, MCPs are required to perform initial and subsequent site reviews, consisting of an FSR and an MRR, using the DHCS FSR and MRR tools and standards. The site review process is part of the MCP's quality improvement programs that focus on the capacity of each PCP site to ensure and support the safe and effective provision of appropriate clinical services.

Attestation

I hereby affirm that the information indicated on this form and any documents thereto is true, current, correct, and complete, to the best of my knowledge and belief and is furnished in good faith. I understand that material omissions or misrepresentations may result in denial of my application or termination of my privileges of *Physician Participation Agreement*.

Provider/designee named below agrees that the information provided during the virtual survey will be accurate and current to the best of their knowledge to date.

Date:	
Physician/designee print name:	
Title:	
Physician/designee signature:	