

Addendum to:

Navigating the Maze: Overcoming the Obstacles for Reimbursement of DSME/T in Hospital-Based Outpatient Programs

Additional Site Considerations

If an accredited DSMT program is interested in adding satellite sites to their programs, the following questions and issues must be addressed:

The SPONSORING ORGANIZATION (i.e. hospital or diabetes program) must notify the national Accrediting Association (AADE, ADA or IHS) of the program adding satellite sites to their accredited program. Each of the national Accrediting Associations has specific paperwork and process that must be followed. The National Accrediting Association will notify the SPONSORING ORGANIZATION when those locations have been added to the DSMT certification.

However, there are additional questions that the SPONSORING ORGANIZATION must address internally:

- If tax-exempt, satellite sites must understand if DSMT classes held at their facility would impact their tax-exempt status in any way
- SPONSORING ORGANIZATION (e.g., hospital) should notify the state's government agency responsible for licensing and regulating healthcare organizations. Hospital should verify that the hospital's license extends to off-site locations and understand if any special filings are required if services extended to off-site locations
- If the SPONSORING ORGANIZATION is Medicare accredited, they must contact their Medicare administrator contractor (MAC). Their MAC can let them know if there are specific requirements for providing DSMT in satellite sites. They should understand the organization's Medicare participating agreement, as Medicare regulations can vary by hospital type, participation agreement and geographic location

Some additional considerations for the SPONSORING ORGANIZATION:

- Maintaining hospital custodianship of patient records documenting DSMT services and assuring proper storage
- Understand if there are any reimbursement implications if provided at "skilled nursing" facility that receives Medicare funds.
- Understand anti-kickback implications if provider in the off-site facility (physician's practice, pharmacy, DME co.) refers patients to the DSMT program

and shares DSMT reimbursement. Leasing arrangements, with an emphasis on fair market value, are often necessary to prevent these implications.

- Joint Commission Standards of ensuring patient's general safety inside and outside the location
 1. Inside issues may include fire escapes, bathrooms, food and beverage availability, adequate lighting, etc.
 2. Outside issues may include parking lot safety, snow and ice removal, wheelchair accessibility at the entrance, etc.
 3. Ensuring system in place for patient to receive emergency medical care if needed
 4. Ensuring hospital's infection control policies and procedures are maintained in the location (especially if teaching insulin administration, BG monitoring requiring a finger stick, CGM catheter placement, etc.)
 5. Ensuring patient privacy of health information, either hard-copy documents or electronic
 6. Ensuring hospital employee safety and extension of benefits, such as workers compensation