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**Subject: *Regulatory Review –Concierge Medicine and Executive Health/Wellness Programs –
La Jolla
Audit & Management Advisory Services Project 2013-17B***

Audit and Management Advisory Services (AMAS) has completed a planned review of four non-licensed clinics as part of the Fiscal Year 2012-13 audit plan. This report summarizes the results of our review of the Concierge Medicine and Executive Health/Wellness Programs in La Jolla. The results of our reviews of the other clinics will be provided to management in separate reports.

Background

Currently, there are no federal or state regulations requiring that medical clinics be licensed. The UC San Diego Health System (UCSDHS) has established clinics in both hospital licensed space, and non-licensed space. Ambulatory Care personnel manage most UCSDHS clinics, which helps to ensure that the same operational standards are implemented in all locations. The Ambulatory Care Regulatory Affairs Office conducts periodic reviews and requested consultative services in both licensed and non-licensed clinics. Because clinics in licensed space must comply with licensure requirements, clinic activities are periodically monitored to ensure that they are meeting the standards. However, regulatory monitoring of non-licensed clinics is generally less frequent.

The Concierge Medicine and Executive Health/Wellness Programs (Concierge Medicine/Executive Health) operate in a non-licensed facility in La Jolla. The Program Director reports to the Program Medical Director and to the UCSDHS Ambulatory Care Director.

Concierge Medicine/Executive Health provides services to a unique patient population. Concierge Medicine delivers personalized primary care services to individuals with insurance coverage through a Medicare Plus Preferred Provider Organization (PPO), a private PPO or on a cash basis. For a non-reimbursable annual membership fee of \$2,500, Concierge Program members have 24/7 access to his or her primary care physician at the La Jolla clinic. The Gold Membership (\$5,000 annual fee) includes guest relations and valet services, which are provided by the Medical Center at the member's request.

Members may expect extended clinic visits, house calls as needed, and physician communication via text messages or email. Concierge Medicine staff assists with coordinating and scheduling all

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procedures or tests not provided at the clinic and hospital stays. Concierge Medicine collaborates with the UCSD Medical Group in identifying physicians and non-physician providers who will provide treatment for members on short notice to ensure continuity of care.

The Executive Health/Wellness Program is a UCSDHS contracted service provided to outside companies. The Program provides corporate executives with a one-day wellness evaluation/assessment, which includes a consultation and complete physical exam. The company is charged an agreed upon amount for each executive seen at the clinic. The examination report and related test results are sent to the company's corporate office.

The UCSDHS Weight Management Program (Weight Management) operates in Concierge /Executive Health clinic space and reports to the Concierge Medicine/Executive Health Director. Weight Management provides consultative and patient training/education services, which are also available to Concierge Medicine patients. It utilizes two of the six patient exam rooms in the suite, and sessions are held Monday through Thursday in the afternoon and evenings only to facilitate uninterrupted Concierge Medicine clinic operations.

In April 2013, Concierge Medicine/Executive Health agreed to sublet space to UCSDHS Sports Medicine Program (SMP) under a one year Memorandum of Understanding (MOU). SMP utilizes up to three patient exam rooms for one and one-half days per week. Exam room scheduling is coordinated through Concierge Medicine staff.

Concierge Medicine/Executive Health also completes stress and EKG exams for Sulpizio Cardiovascular Center patients on a recharge basis; as well as phlebotomy services to the Dermatology outpatient clinic. Patient records for those services are maintained by each clinic.

Most patient health records are created in the Epic¹ electronic health record (EHR), and any printed health records that need to be added to the health record are scanned into the EHR. Clinic management expects that Epic will be fully implemented in the fall of 2013.

Audit Objective, Scope and Procedures

The objective of this review was to evaluate clinic operating standards and regulatory compliance with a focus on the following topics:

- Organizational Oversight and Monitoring
- Personnel File Review
- Medication Inventory Management
- Patient and Staff Safety
- Patient Health Records Management
- Medical Equipment Management

AMAS collaborated with the Ambulatory Services Regulatory Office and utilized parts of its tracer tool in creating the audit methodology used to complete our review.

¹ Epic is the electronic health record system implemented by UCSDHS.

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We performed the following audit procedures to achieve the project objective:

- Interviewed the Program Director and key personnel;
- Contacted various UCSDHS regulatory offices, as needed;
- Examined personnel files kept at the clinic and Central HR office;
- Verified staff licensure information on line; and
- Completed a tour of the facility and observed clinic practices.

Clinic review procedures were focused on Concierge Medicine/Executive Health clinic management practices, and did not include an evaluation of UCSDHS Weight Management Program or SMP operations. Charge capture processes and financial management procedures were not included within the scope of our review.

Conclusion and Supporting Comments

Based on our review procedures, we concluded that Concierge/ Executive Health clinical operations are managed in accordance with UCSDHS policies and applicable regulations. The standards and protocols implemented in licensed clinics have been adopted to manage medication administration and inventory, patient and staff safety, privacy, equipment, and patient health records. The UCSDHS Corporate Compliance and Privacy Office, the Ambulatory Services Regulatory Office, Environment of Care (EOC) and Infection Control (IC) units assess clinic operations on a periodic basis.

AMAS noted the following best practices while completing the clinic site visit:

- Physician offices and the staff lounge are equipped with noise-cancelling devices to maintain patient privacy.
- Patient rooms and the patient waiting area are well-maintained, and organized.
- Management has implemented the EOC/IC recommended corrective actions to address findings identified during regular EOC/IC clinic rounds.
- The Program Director attends regular Ambulatory Care Regulatory Council meetings and apprises the clinic staff of new protocols, policies and procedures during regular monthly meetings. Copies of new announcements and clinic protocols are kept in a binder at the clinic for reference.
- Medical equipment maintenance was current.

Audit and Management Advisory Services appreciates the cooperation and assistance provided by Concierge Medicine/Executive Health personnel during the review.

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UC policy requires that all draft audit reports, both printed and electronic, be destroyed after the final report is issued. Because draft reports can contain sensitive information, please either return these documents to AMAS personnel or destroy them at this time.

If you have any questions regarding this report, please call me at 534-1334.

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