**Free Clinic Membership Quality Care**

**Standards**

**2017**

Please direct questions regarding this document to Deb Miller, Director, deb@ohiofreeclinics.org or 614-914-6458

### Dear Current and Potential Member Clinics,

The mission of the Ohio Association of Free Clinics is to educate and equip free clinics in planning and delivering quality health care for the underserved. In order to ensure quality care for our residents, we must first identify what quality is and then provide a mechanism to evaluate and report the quality of care being provided through the free clinic system. With this in mind, the OAFC has formalized the following Quality Assurance standards for all member clinics.

The primary purposes of these standards is to create dual accountabilities for clinics and the association in documenting, for public stakeholders, partners, and funders, the quality and quantity of services/care delivered by member clinics.

Secondarily, the standards will help the OAFC develop strategic member benefits to fulfill our mission to “support and strengthen member clinics” with a quality network of programs that will enhance clinics’ administrative and clinical programs.

Current and potential members will be expected to attest/pledge that they successfully incorporate these standards of practice within their organizations. Site visits and organizational audits will be performed and reports and recognitions of performance will be provided to the membership and other stakeholders.

The goal of implementing these Standards of Quality Care is not to burden free clinics with additional administrative busy work. The OAFC has made a strong commitment to provide resources and support to clinics to help them achieve the highest level of quality possible.

Sincerely,

Deborah Miller Executive Director

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Standard #1: Enhanced Access and Continuity *17 points*

## Element A: Access During Office Hours *3 Points*

**Explanation and Documentation:**

Since free clinics are often open limited hours each week, it is important that patients know the community resources and the appropriate use of those resources.

* Free Clinics should educate all patients on the appropriate use of the emergency room as well as provide alternative sources of care for non-emergent treatment when the clinic is closed. The practice should have a documented process in place that includes the process for staff and volunteers to follow in providing this information to patients. Additionally, any formal agreements for providing patient care with other organizations should be clearly documented and kept on file for review.
* As part of the health care safety net system, free clinics have a responsibility to form collaborations and agreements with other community stakeholders.
* Free Clinics have a process in place to assist patients in finding a permanent medical home when appropriate. Patients should be provided with a current list of alternate sources of care along with contact information.
* Documented process for staff and volunteers to follow.

**Standards:**

1. Free Clinics should develop a formal handout of referral sources in their community that **is not** the emergency room (unless a true emergency).
2. Free Clinics are encouraged to retain community collaboratives and form relationships and understanding with other community stakeholders.
3. Free Clinics are encouraged to assist patients (when appropriate) to find a medical home. Examples of “when appropriate” may include, but not be limited to:
	* Newly insured
	* No longer qualify for free clinic services
	* Referral sources may include, but are not limited to:
	* Federally Qualified Health Centers (FQHC’s); local Health Departments; Private Physicians

## Element B: Continuity of Care *1 Point*

**Explanation and Documentation:**

* In the free clinic setting, a personal clinician is considered a group of volunteer physicians with one Medical Director.

**Standard:**

1. Continuity of care with a provider in the free clinic setting isn’t always practical. However, continuity can be encouraged by helping patients understand their relationship within the clinic. If a clinic is a medical home, the patient should understand that they should call the clinic before going to the emergency room for non-emergent needs. If a clinic provides episodic care only, the patient should know and understand the clinic model of health care delivery and be provided a list of other sources of care.

## Element C: Free Clinic Responsibilities: *4 Points*

**Explanation and Documentation:**

* Free Clinics have a process for providing patients and their families’ information on the obligations of the free clinic and the responsibilities of the patient as partners in care. The model of a volunteer free clinic is explained to patients and information is provided in several different formats. The clinic has policies clearly stating the clinics responsibilities and how this information is shared with volunteers, staff and patients and their families.
* Information provided to patients includes clinic hours and where to seek care after hours. Free clinics maintain a medical record that includes (but not limited to) comprehensive patient information such as medications; clinic visits; visits to specialists; medical history; health status; test results; self-care information and data from recent hospitalizations. Patients can expect evidence-based care from their clinician as well as support for self-management of their health and health care.

**Standard:**

1. Every free clinic has a policy stating **exactly**:
	* What the clinic provides in the way of health care
	* What responsibilities the *clinic* has in the patient/clinic relationship
	* What responsibilities the *patient* has in the patient/clinic relationship
2. A patient education sheet should be created and provided to each patient explaining the “rules of the road” to patients, so they know what the clinics responsibilities are and what their (the patient’s) responsibilities are.

## Element D: Culturally and Linguistically Appropriate Services: *4 Points*

**Explanation and Documentation:**

* Free clinics have a report showing its assessment of the racial, ethnic and language composition of its patient population. Language services and/or multi language staff should be used to interpret for the patient. Requiring a friend or family member present to interpret is not acceptable practice. Patients may be less forthcoming with a family member present and the family member may not be familiar with medical terminology.

**Standard:**

1. Each clinic should know or determine the racial and ethnic diversities of its population.
2. All free clinics should understand and meet the cultural and linguistic needs of their patients.
3. Interpretation services should be available for non-English speaking patients.
4. Printed materials should be available in the languages of each clinics’ population.

**Element E: The Practice Team: 5 *Points***

**Explanation and Documentation:**

Factor #1: Job descriptions should provide staff position descriptions identifying roles and functions.

Factor #2: Free clinics should have a description of it’s structured communication process. Team meetings may include huddles; which are a meeting to discuss patients being seen for that day. A structured communication plan may include regular e-mail exchanges, tasks or messages placed in the patients medical record about that specific patient. a

Factor #3: Free Clinics can use standing orders such as testing protocols, defining triggers for prescription orders, medication refills, vaccinations, and routine preventive services. Policies should be in place explaining exactly when standing orders can bemused and by who.

Factor #4: Care coordination may include obtaining test and referral results and communicating with community organizations, health plans, facilities and specialists. Free clinics should demonstrate that they have a training process and training schedule for training staff in each area identified.

Factor #5: Care team members should be trained in evidence-based approaches patient care.

**Standard:**

 Free Clinics have documentation demonstrating the following:

* 1. Defining roles for clinical and non-clinical team members (job descriptions)
	2. Having regular team meetings or structured communication processes
	3. Using standing orders
	4. Training and assigning teams to provide patient care
	5. Teams should include not only the provider, but also social workers, pharmacists and other ancillary services.

## Standard #2: Identify and Manage Patient Populations *5 Points*

**Element A: Patient Information: *1 Point***

#### Explanation and Documentation:

* The free clinic documents and updates patient’s information on a regular basis. The clinic has a process whereby patient information is verified and updated in a systematic method to ensure accuracy.
* The free clinic provides reports from the medical record showing the percentage of **all** patients for each populated data field. The report contains each required data element to determine how many elements are consistently entered in the practice’s electronic system.

**Standard:**

1. Free Clinics will gather patient demographic information and keep patient information in a medical record. Information will include but not be limited to:
	* Date of birth
	* Gender
	* Race
	* Ethnicity
	* Preferred Language
	* Telephone Numbers
	* E-mail Addresses
	* Dates of Clinical Visits
	* Health Insurance Information

**Element B: Clinical Data: *1 Point***

**Explanation and Documentation:**

* The free clinic documents and updates patient’s information on a regular basis. The clinic has a process whereby patient information is verified and updated in a systematic method to ensure accuracy.
* The free clinic provides reports from the medical record showing the percentage of *all* patients for each populated data field. The report contains each required data element to determine how many elements are consistently entered in the practice’s electronic system.

**Standard:**

1. Free Clinics keep a medical record for each patient with appropriate information which may include the following:
	* An up-to-date list of current and active diagnoses
	* Allergies, including medication allergies and adverse reactions
	* Blood pressure
	* Height
	* Weight
	* BMI
	* Current list of prescription medications

## Element C: Health Assessment: *3 Points*

**Explanation and Documentation**

* The free clinic will conduct a comprehensive health assessment that identifies health risks, barriers, and literacy and their role in the patient’s overall health status. The health assessment includes an evaluation of social and cultural needs, preferences, strengths and limitations. Examples of these characteristics can include family/household structure, support systems, household/environmental risk factors and patient/family concerns. The practice identifies whether the patient has specific communication requirements (e.g., because of hearing or vision issues).
* The practice provides a process showing how the information is consistently collected *or* a completed patient assessment of the factors documented during the health assessment

### **Standard:**

### A comprehensive health assessment will be maintained in the medical record and will include:

* + Documentation of immunizations and screenings

### Medical history of patient and family

### Communication needs

###

## Standard #3: Plan and Manage Care 19 *Points*

**Element A: Identify High-Risk Patients *2 Points***

**Explanation and Documentation:**

* Identification of High-Risk Clinic Patients whose overall medical condition warrants care management
* Free Clinics should identify patients as high-risk if the patient has two different diagnoses, recent hospital admission, mental illness, or non-compliance.
* Free Clinics should identify patients as high-risk if the patient has a high-risk chronic disease such as Diabetes, Epilepsy, Heart Disease, Cancer, Hypertension, or Alzheimer’s disease or any other measurement that the clinic identifies as high-risk.
* Free Clinic will document each high-risk patient and follow the Care Management Plan for High-Risk Patients

### **Standard:**

### Define “high-risk” as it relates to your practice

* + High risk may include things like a hospital admission, emergency room use, two different diagnoses, non-compliance or any other measurement that a practice identifies as high risk.
	+ Identify patients in the practice meeting the “high-risk” definition.

**Element B: Care Management *7 Points***

**Explanation and Documentation:**

* Follow the Care Management Plan for High-Risk Patients during each visit to the clinic
* Provide High-Risk Patients with longer appointment times.
* Healthcare Provider should ask patient for their chief health concern and then Healthcare Provider includes patient in the decision-making process.
* Healthcare Provider or Nurse provides the patient with a care plan along with goals that the patient
* can refer to after their appointment. Care plan is updated at every visit. It is suggested that each high-risk patient is provided with a clinical summary of the visit along with test results and treatment provided at visit.
* It is recommended that a Nurse or Healthcare Provider follow-up with patient after clinic hours.
* If patients do not meet goals, then Nurse or Healthcare Provider will identify barriers and available resources to overcome obstacles.

**Standard:**

### Allow high risk patients to have more appointment time

1. Ask patients “What is your number one concern?”
2. Make the patient part of the decision making process
3. Have a plan of care the patient can refer to after their appointment
4. Have nursing follow-up with patient
5. If patients don’t meet goals, identify barriers and know and use resources to overcome obstacles.
6. Provide each patient a written summary of the visit, which includes test results and treatment provided this visit.

## Element C: Medication Management *4 Points*

**Explanation and Documentation:**

* Healthcare Provider or Nurse will document all medications including over-the-counter medication use by patient.
* Healthcare Provider or Nurse will provide patient with health education in regard to medication including how to take medication, interactions, and side effects. Healthcare Provider or Nurse will assess patient understanding of medication use to ensure compliance.
* Provider, Nurse or Pharmacist will assess availability of medication

**Standard:**

### Provide patient education related to medication management

1. How to take medications
2. Interactions and side effects
3. Assess availability to access medications

## Element D: Test tracking and follow-up *6 Points*

**Explanation and Documentation:**

* Healthcare Provider or Nurse will develop and maintain a clearly defined documented process or procedure for staff.
* Healthcare Provider or Nurse will track lab tests until results are available, flagging and following up
* on overdue results.
* Healthcare Provider or Nurse will track imaging tests until results are available, flagging and following up on overdue results.
* Healthcare Provider or Nurse will flag abnormal lab results, bringing them to the attention of the
* clinician.
* Healthcare Provider or Nurse will flag abnormal imaging results, bringing them to the attention of the clinician.
* Healthcare Provider or Nurse will notify patients/families of normal and abnormal lab and imaging
* test results.
* Healthcare Provider or Nurse should document in patient chart when and how patient was notified of results along with test results.

### **Standard:**

### Free Clinics will develop and maintain documented process or procedure for staff.

* + Track lab tests until results are available, flagging and following up on overdue results
	+ Track imaging tests until results are available, flagging and following up on overdue results
	+ Flag abnormal lab results, bringing them to the attention of the clinician
	+ Flag abnormal imaging results, bringing them to the attention of the clinician
	+ Notify patients/families of normal and abnormal lab and imaging test results.
	+ Document in patient chart when and how patient was notified of results

**Standard #4: Provide Self-Care Support and Community Resources 7*Points***

## Element A: Support Self-Care Process *4 Points*

**Explanations and Documentation:**

* The practice provides patients with self-management support and tools beyond the counseling or guidance typically provided during an office visit, and provides or refers patients to self-management programs or classes. Programs may be offered through community agencies, a health plan or a patient’s employer.
* Educational programs and resources may include information about a medical condition or about the patient’s role in managing the condition. Resources include brochures, handout materials, videos, Web site links and pamphlets, as well as community resources (e.g., programs, support groups). Based on the practice’s assessment of languages spoken by its patient’s materials in languages other than English should be available for patients/families, if appropriate.
* Patients/families may be referred to resources outside the practice, with consideration that resources may not be covered by health insurance. Self-management programs may include asthma education, diabetes education and other classes or groups as well as referrals to community resources for the uninsured and underinsured or for transportation assistance to medical appointments for patients. A list of community educational and programmatic resources should be compiled and kept on file as a resource in the clinic.
* The clinic will work with patients to develop a self-care plan that addresses a patient’s condition and includes goals and a way to monitor self-care. The clinic will develop a documented process or use a template-documented process provided by the OAFC to reflect how the clinic plans to develop a self- care plan with a patient. For example, a practice may use a list of questions to identify patient goals and needs and then have a patient sign an “agreement” that he or she is willing to work towards the goals outlined. The patient will be provided with self-management tools (such as a food diary, weight log sheet etc.) by the clinic. The clinic can create their own self-management tools or use template tools made available from OAFC.

### **Standard**:

### Free Clinics are encouraged to provide educational resources or referrals to patients and families to educate about resources to assist in self-management as is appropriate for your practice.

* + Resources will include materials such as smoking cessation, diabetes management, medication management, etc.
	+ Free Clinics will develop a plan that is realistic for free clinic populations including the plan and goals for patients.
	+ Free Clinics will provide self-management tools to record self-care results.
	+ These tools may include blood pressure records; weight records, medication records and/ or other records relative to the patient’s disease process.

## Element B: Provide Referrals to Community Resources *3 Points*

**Explanation and Documentation:**

* The key resource list is specific to the needs of the practice’s population— not specific to patients with important conditions—and includes programs and services to help patients in self-care or give the patient population access to care related to at least five topics or key community service areas of importance, which may include:
* Smoking cessation
* Weight management (under- and overweight) Exercise/physical activity
* Nutrition
* Parenting
* Dental
* Other, such as:
	+ Transportation to medical appointments
	+ Noncommercial health insurance options
	+ Obtaining prescription medications
	+ Falls prevention
	+ Meal support
	+ Hospice
	+ Respite care
	+ Child development
	+ Immunization information
	+ Child care
	+ Breastfeeding etc.
* Although the practice may provide one or more services, it must also identify services or agencies available in the community. The intent of the element is for the practice to connect patients with available community resources.
* The clinic tracks frequency and types of referrals to agencies to evaluate whether it has identified sufficient and appropriate resources for its population over time.
* The clinic provides treatment or identifies a treatment provider and helps patients get care for mental health and substance abuse problems, if needed.
* The clinic shall compile a list that of community resources and services that cover at least five of the above topics/service areas. The list of community resources for educational programs referenced above in Element A can be used as part of the documentation for Element B, bearing in mind that the information compiled for resources in Element A may not cover enough topics for Element B. In such a case, the list from Element A would be used as a starting point to build upon.
* The clinic workers shall note the type of referral and material given to the patient at the time each is provided. If a patient is a regular visitor of the clinic, the clinic worker shall follow up with the patient on referral appointment attendance and adherence to any care plan given. All should be noted and dated in the patient chart
* If a clinic has an existing referral relationship with a mental health provider or a specialist, the clinic should make all efforts to schedule the patient for the referred appointment and follow up with the referred to provider to assure the patient attended. The clinic should make every effort to send and receive patient information between the clinic and specialist to attempt to ensure continuity of care and a complete patient medical record

**Standard:**

1. Free Clinics will maintain a current resource list on five topics or key community service areas of importance to the patient population.
2. Free Clinics will track referrals provided to patients/families
3. Clinic arranges or provides treatment for mental health and substance abuse disorders.

## Standard #5: Track and Coordinate Care 8 *Points*

**Element A: Test Tracking and Follow-up *2 Points***

**Explanation and Documentation:**

* Monitoring ensures that clinics perform necessary tests and act upon any results that require action. Ineffective tracking and managing of test results can cause suboptimal patient care if clinics do not follow up on results.
* Patients should not be left to wonder for longer than necessary about their results.
* The clinic has a written process or procedure for staff and a report or log showing the test tracking containing the test name and date of performance and date results are returned.

**Standard:**

1. Free Clinics track tests performed on patients by means determined by the practice and follow-up on test results to make sure that needed tests are performed and acted on when needed.
2. Free Clinics establish a consistent protocol to communicate to patients both normal and abnormal lab, tests, and imaging results.

## Element B: Referral Tracking and Follow-up *2 Points*

**Explanation and Documentation:**

* Referral tracking is an important part of providing seamless continuum of care for patients.
* Tracked referrals will be considered important by the clinician for a patient’s treatment, or in accordance with the clinic’s guidelines. In order to best take care of patients, different practices must cooperate and share files and important information. Clinics and specialists that interact regularly will establish time periods within which they must share patient information.
* In order to maintain good standing with other community health providers, patients referred by the clinic should attend their appointments with the specialists. As a sign of respect, and to assure the best care possible is being provided, patients should keep their appointments with organizations to which the clinic refers them.
* The clinic has a documented process or procedure and a report or log showing the referral tracking process is followed.
* A Memorandum of Understanding may be created between clinics and any referred specialists.

**Standard:**

1. Clinics should establish a policy and procedure to refer patients to specialists, as well as protocol to follow up with the specialist provider to obtain relevant patient medical records from a patients visit to a specialist; both for one-time and ongoing specialist care.
2. Clinics should establish a process to follow-up with a patient to ensure the patient is keeping referral appointments, including appointments with specialists.

## Element C: Coordinate with Facilities and Manage Care Transitions 4 *Points*

**Explanation and Documentation:**

* The emergency room should be used for crises only, and patients that do not have a serious condition should not seek treatment at an ER. Other community health centers are available to help patients when the clinics do not run to prevent large bills and to prevent the ER from becoming overcrowded.
* Clinics must be able to respond to issues that sent the patient to the emergency room to prevent worsening conditions, and provide follow-up care.
* Clinics may create educational documents about emergency room usage, and other community healthcare providers, especially those that can accommodate patients with insurance or financial changes.
* Clinics should have space on the chart to note visits to the ER or other providers that list the provider and the date of the visit, and a brief reason for the visit.

**Standard**:

1. Clinics should provide patient education on proper use of emergency care to help guide patients towards more consistent, non-institutional providers for routine health care needs.
2. Clinics should provide patients with information on alternative providers to the Emergency Room for non-emergent care.
3. Clinics should have a process in place to coordinate care transitions to other primary care providers if a change in the patient’s financial or insurance coverage circumstances change.
4. Clinics should inquire and note in the patient chart if a patient has been treated in a hospital, emergency room or any other provider since the patient’s last visit to the clinic.

## Standard #6: Measure and Improve Performance 11 *Points*

**Element A: Measure and Improve Performance *1 Point***

**Explanation and Documentation:**

* The clinic reviews its performance on a range of measurers to help it understand its delivery of care system’s strengths as well as the opportunities for improvement. Clinics may choose to measure any or all of the following:
	+ - Preventive Care
		- Chronic or acute care
		- Utilization measures affecting health care costs
* When a clinic selects measures of performance, they must document the period of measurement, the number of patients represented by the data and the patient selection process.
* Preventive services are routine health care services that include – but are not necessarily limited to -screenings, checkups and patient counseling to prevent illness or disease.
* Chronic or acute care services are important and often long-term conditions such as diabetes, heart disease, asthma, depression, etc.
* Utilization measures are those demonstrations that show resources are used judiciously to help patients receive appropriate care. These measures may include things like ER visits, potentially avoidable hospitalizations and hospital readmissions, redundant imaging or lab tests, prescribing generic medications instead of brand name medications, etc.

**Standard:**

1. The clinic will review and assess its performance and health outcomes in order to better understand what is working and what is in need of improvement to better serve the patient population.

## Element B: Measure Patient /Family Experience *2 Points*

**Explanation and documentation:**

* Free Clinics obtain feedback from patients/families on their experiences with the practice and their care. All feedback will be compiled into reports with summarized results of patient feedback.
* Free Clinics should administer a survey to evaluate the patient/family experiences with the clinic and access to health care. Evaluation experiences may include items such as:
	+ - Access
		- Communication (culturally and linguistically): including feelings of respect, being listened to and being able to get questions answered.
		- Whole-person care: may include the provision of comprehensive care, self-management support, advice and assistance and support for making changes in health habits and health care decisions.
* Free Clinics will gather data from patients and their families through methods such as focus groups, individual interviews, suggestion boxes, and/or phone conference interviews.

**Standard**:

1. Clinics should administer patient and family satisfaction surveys in a culturally and linguistically appropriate manner for the patient population in order to assess areas in need of improvement.
2. Clinics should establish a process to capture feedback from any patient advisory council or similar body that encourages patient engagement in an effort to augment the information collected from the surveys.

## Element C: Implement and Demonstrate Continuous Quality Improvement

## *5 Points*

**Explanation and documentation:**

* Free Clinics must have a clear and ongoing quality improvement plan and a process that includes consistent reviews of performance data and evaluation of performance against goals.
* Free Clinics set goals and act to improve performance based on resource measures and patient experience measures. The goal is for the clinic to reach a desired level of accomplishment based on its self-identified goals for improvement. Clinic must demonstrate that it collects clinical, and/or patient experience performance data and assesses the results over time.
* Volunteers and staff should be trained and strategies for improvement embedded into the clinic practice to be able to measure improvement and make changes in real time that are necessary to achieve improvement goals.
* Free Clinics can demonstrate that its performance on the measures has improved over time, based on its assessment. The clinic provides reports demonstrating improvement on performance measures.

**Standard**:

1. The clinic should have an ongoing quality improvement strategy that includes ongoing review of performance and outcomes as compared to established goals.
2. This process helps the practice assess areas for improvement and possible impediments to achieving goals.
3. Quality improvement strategies need to be imbedded into the practice culture to be able to measure improvement and make changes in real time that are necessary to achieve improvement goals.
4. Clinics should be able to measure and compare outcomes over time in areas identified for improvement.
5. Implement and Demonstrate Continuous Quality Improvement

## Element D: Report Performance and Data Externally and Internally 3 *Points*

**Explanation and documentation:**

* Free clinics may use the data produced for the following:
* Reports to individual clinicians and staff (via memos, staff meetings, etc.)
* Reports to the public by the health plan
* Reports to patients
* Reports reflect the care provided by the care team

**Standard:**

1. Clinics should share data on health outcomes and performance metrics established by the practice in an effort to exhibit the impact of quality improvement and intervention strategies, as well as to hold all in the team accountable to achieving improvement.
2. Report Performance and Data Externally and Internally
	* Examples of sharing data internally could be discussion in team meetings or posting unidentified patient data in a staff area.
	* Examples of sharing data externally could be inclusion in an annual report or newsletter, or sharing data with a government agency

**Standard #7: Administrative *17 Points***

## Element A: Mission 1 Point

## Standard:

1. Organization will have purpose and mission clearly stated, as well as provide services consistent with the stated mission.

**Element B: Governing Body 3 Points**

 **Standard:**

1. Each Clinic must have a defined description of their Board, including the size of the Board, the term length for Board members, and stated expectations for members.
2. The conduct for Board members must be presented to each member and include:
	* Policies for attendance and participation.
	* The set number of board meetings per year.
	* Responsibilities for each of the potential subcommittees.
	* Annual evaluation of the performance of the Board.
	* A procedure for selecting new Board members.
3. The responsibilities of the Board must be clearly presented and include the following:
	* Ongoing planning and evaluation of the Clinic.
	* Creation of policies for effective management of the organization.
	* Approval of organization’s budget and assessment of organization’s financial performance in relation to the budget and review of expense percentages
	* Supervisory role of the Executive Director and other Leadership positions.

**Element C: Human Resources 4 Points**

**Standard:**

1. Each clinic provides policies that address assessment, screening, training, evaluation, and advancement for Staff and Volunteers.
2. Written personnel policies for employees and volunteers.
3. New employees receive review of policies and musk acknowledge their understanding in writing.
4. Clinics must perform written evaluations, at least once per year.

**Element D: Financial and Legal *5 Points***

**Standard**:

1. Financial Accountability
	* Each clinic must produce timely financial reports and have their Board annually review their budget.
	* Clinics with annual revenue over $300,000 must obtain an audit by an independent accounting firm.
	* Clinics must provide confidential means for employees to report suspected financial impropriety.
2. Legal Compliance and Accountability
	* Clinics must comply with Federal, State, and local law.
	* Clinics perform an internal review of the organization’s compliance and present the findings to the Board.
3. Insurance Coverage
	* Clinics must have General Liability, Medical Malpractice, and Directors and Officers (D&O) Liability insurance coverage.

**Element E: Public Affairs and Public Policy *2 Points***

**Standard**:

1. Each clinic must establish a policy concerning the process of forming an organizational position on public policy issues
2. Clinics must have assurance that publicly distributed educational information is factually accurate, as well as provides sufficient context

**Element F: Conflict of Interest *2 Points***

**Standard**:

1. Clinics must provide a written policy applicable to staff, board, and volunteers
2. Clinics must provide a policy for disclosure potential conflicts of interest from staff, Board members, and volunteers.

**Final Scores: Standards #1-7 = 84 Points**

|  |  |  |  |
| --- | --- | --- | --- |
| Tier 3: AAA Rating | Tier 2: AA Rating | Tier 1: A Rating | No Rating |
| 64-84 Points total | 43-63 Points total | 22-42 Points total | 0-21 Points |