

## Comparison of Licensure Regulations

### LIMITED SERVICE HOSPITAL (LSH)

### FREESTANDING MEDICAL FACILITY (FMF)

What is an LSH	What is an FMF
Health care facility licensed as a hospital on or after Jan 1 1999 that eliminates the capability to admit or retain patients for overnight hospitalization & provides an emergency or urgent care center for the purpose of providing advanced life support.	Health care facility providing medical & health services that is physically separated from a hospital or hospital grounds & is an administrative part of a hospital or related institution.
How is LSH created by a hospital	How is FMF created by a hospital
Obtain an exemption from CON from MHCC & apply for a license from DHMH.	Obtain a CON from MHCC & apply for a license from DHMH.
Restricted nomenclature for LSH	Restricted nomenclature for FMF
“emergency department” “emergency center” “emergency room” Cannot convey to public that LSH is prepared to provide full range of emergency services that are normally provided by a hospital.	“emergency department” “emergency room” “hospital”
LSH hours of operation	FMF hours of operation
24/7	24/7
LSH Services	FMF Services
Advanced Life Support Diagnostic Imaging Laboratory Services Pharmacy Services	Advanced Life Support Diagnostic Imaging Laboratory Services Pharmacy Services  Radiology services consistent with ACEP guidelines  Laboratory services consistent with ACEP guidelines & State regulations (COMAR 10.10.01- .08).  Pharmacy services may be provided by the affiliated hospital or contract pharmacy. FMF may have 24/7 pharmacy or provide information to patients on 24/7 pharmacy services in the community.

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Patient Access to LHS and Other Services	Patient Access to FMF and Other Services
<p>Emergency services are available at the LSH for all persons regardless of ability to pay.</p> <p>Role in EMS system approved by MIEMSS including procedures for transporting individuals to other hospitals or health care facilities.</p> <p>LSH must transfer or refer patients who require services not provided by the facility.</p>	<p>Regardless of a patient’s medical condition, insurance status, or ability to pay, the FMF must provide stabilizing treatment to a patient presenting with an emergency medical condition.</p> <p>Meets MIEMSS requirements for accepting patients from EM System.</p> <p>FMF must have pre-arranged transfer agreements with facilities capable of providing definitive care appropriate for nature and severity of the patient’s illness or injury, and provide ambulance service when necessary.</p>
LSH Staffing	FMF Staffing
<p>No administrative requirements</p> <p>At least 1 physician credentialed in EM at all times</p> <p>Sufficient number of RNs and other health professionals with appropriate training to provide ALS</p> <p>At least 1 radiology technician At least 1 laboratory technician</p> <p>Supervision of pharmaceutical services by licensed pharmacist</p>	<p>Full-time administrator</p> <ul style="list-style-type: none"> <li>• Liaison with affiliated hospital</li> <li>• Directs daily operation</li> <li>• Ensures staff capability for resuscitation, stabilization, timely triage, appropriate transfer, &amp; patient safety and QA program</li> </ul> <p>Medical director that is physician Board certified or eligible in EM and who provides clinical oversight. At least 1 physician trained in EM at all times.</p> <p>Sufficient number of RNs and other health professionals with appropriate training to provide ALS</p> <p>Staffed at all hours of operation by licensed independent practitioners, nurses, &amp; ancillary health care professionals with certification experience, competencies, &amp; skills necessary for providing basic and advanced life support for children and adults.</p> <p>Certified medical radiation technologist Laboratory technician</p> <p>Staffing patterns must accommodate the potential for the unexpected arrival of additional patients and be assessed regularly.</p>
LSH Credentialing	FMF Credentialing
<p>The LSH must comply with the requirements of COMAR 10.07.01.24</p>	<p>Physicians and other licensed independent practitioners must be credentialed consistent with COMAR 10.07.01.24</p>

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LSH Equipment & Supplies	FMF Equipment & Supplies
<p>An LSH must have and maintain equipment necessary to provide the following care:</p> <ul style="list-style-type: none"> <li>• Cardiac monitoring, defibrillation, and external pacing;</li> <li>• Medication administration;</li> <li>• Oxygen therapy;</li> <li>• Airway management including endotracheal intubation;</li> <li>• Respiratory ventilation; and</li> <li>• IV and intraosseous fluid therapy</li> </ul>	<p>The FMF must have equipment and supplies available and consistent with the “<i>Suggested Equipment and Supplies for Emergency Departments,</i>” ACEP Policy Statement: Emergency Department Planning and Resources Guidelines p7-10.</p>
LSH Quality Assurance	FMF Quality Assurance
<p>An LSH must plan and implement a quality assurance program that includes monitoring and evaluation of the quality of patient care as well as identification, evaluation and resolution of care problems. The quality assurance program must include a peer review process and equipment quality control procedures to monitor the safety and performance of all biomedical equipment.</p> <p>An LSH must conduct and document QA activities on a continuous basis, but not less than quarterly (peer review not less than annually).</p> <p>Quality assurance activity records must include:</p> <ul style="list-style-type: none"> <li>• A description of identified problems;</li> <li>• Findings;</li> <li>• Conclusions;</li> <li>• Recommendations;</li> <li>• Actions taken;</li> <li>• Results; and</li> <li>• Follow-up</li> </ul>	<p>An FMF must have a quality assurance program with quality management processes that are multidisciplinary, and integrated into the quality management program reported to the affiliated hospital’s governing body.</p> <p>The quality assurance process must have structure to ensure that defined program outcomes and performance measures are developed and monitored regularly.</p> <p>Quality assurance documentation must:</p> <ul style="list-style-type: none"> <li>• Verify problems;</li> <li>• Identify opportunities for improvement;</li> <li>• Show corrective actions taken and resolution of problems;</li> <li>• Include review of morbidity and mortality; and</li> <li>• Evaluate medical care, nursing care, utilization review, tissue review, and pre-hospital care.</li> </ul>

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<b>LSH Physical Environment</b>	<b>FMF Physical Environment</b>
<p>An LSH must develop pertinent safety practices including control of fire and mechanical hazards and provide preventive maintenance for equipment in the facility.</p>	<ul style="list-style-type: none"> <li>• The FMF must comply with all federal, State and local building, construction, and zoning laws and requirements.</li> <li>• The FMF must comply with the Maryland State Fire Prevention Code and applicable local fire prevention codes in effect at the time of plan review and construction. Annual fire inspection is required for license renewal.</li> <li>• An FMF must have a preventive maintenance program for all facility systems and equipment and maintain records of maintenance and service repairs performed by appropriately trained staff or contractual services.</li> <li>• The FMF must be clean, safe, free of pests and other hazards, and maintained in good repair at all times. The FMF may employ housekeeping and maintenance staff or services may be provided under contract.</li> <li>• Entrances must be accessible and clearly marked.</li> <li>• Ambulance area must be sheltered for off-loading patients.</li> </ul>
<b>LSH Infection Control</b>	<b>FMF Infection Control</b>
<p>The LSH must develop and implement policies and procedures on the use of standard precautions for infection control and comply with the requirements of COMAR 10.06.01.07, except in an emergency life-threatening situation when it is not feasible to comply with the infection control measures.</p>	<p>The FMF must comply with U.S. CDC guidelines for standard precautions and the federal OSHA/Maryland Occupational Safety and Health, Bloodborne Pathogen Standard, except in a life-threatening emergency in which compliance is not feasible.</p>
<b>LSH Medical Records</b>	<b>FMF Medical Records</b>
<p>The LSH must promptly complete and maintain clinical records in accordance with accepted professional standards and practices. Records must be retained for at least 5 years from the date of discharge.</p> <p>Records must contain appropriate identification and summary information, contact information, evidence of patient assessment of needs, plan of treatment and services/medications provided, consent forms when required, diagnostic and therapeutic orders as well as final diagnosis and discharge summary.</p>	<p>The FMF shall ensure that staff members develop legible and appropriate medical records for each patient who visits the FMF.</p> <p>The FMF must maintain medical records in a secure manner that protects the confidentiality of the patient at all times and develop and implement policies and procedures for disclosure of medical records and patient access to their records.</p>