

The Scope of Non-Physician Provider Practice

The physician shortage, paired with declining reimbursement rates, has fueled physician demand for manpower relief. To meet this demand, the healthcare workforce continues to diversify, with versatility no longer limited to the *horizontal* expansion of specialty and subspecialty areas of medical expertise. Rather, current trends have solicited a *vertical* expansion in the role of the non-physician workforce to provide services that support, supplement, and parallel physician services.

Traditionally, non-physician providers (NPPs) were referred to, collectively, as *"allied health professionals."*¹ However, NPPs have assumed multiple roles in the provision of healthcare services; they may work synergistically with physicians, supplemental to physicians for the provision of select services, or in parallel to physicians for the provision of services that, though comparable to physician services, are entirely outside the scope of physician practice. As such, NPPs may be further divided into three categories based on the *types of services* they provide:

- 1. *Technicians and Paraprofessionals, (a/k/a "Physician extenders")* that either provide manpower support or highly technical services both necessary for and contingent upon the provision of certain specialized physician services;
- 2. Allied Health Professionals, (a/k/a "Parallel providers") whose scope of professional practice is separate, distinct, and, essentially, parallel to the scope of physician practice; and,
- 3. Mid-Level Providers. (a/k/a)"Triage providers") that are trained to provide a specific subset of physician services, with the original objective of providing "triage" relief physicians by enhancing for patient throughput.² Mid-Level Providers are afforded a significant level of autonomy within their scope of practice, and as such may act alongside - or independent of - physicians under certain conditions for the provision of previously determined services.

Be that as it may, practitioners that are authorized to fall in one category may not always provide the services that distinguish them from practitioners in the other categories. For example, mid-level providers are relied upon for the provision of specialized services that are *incident to* physician services, but also exercise a certain measure of independence, as they can autonomously provide a specific scope of services *in lieu* of physicians. The distinction between permitted and practiced scope of service is an underlying cause of the debates over the regulation and reimbursement of non-physician practitioners.

A diverse healthcare workforce may be instrumental to improving efficacy, quality of care, financial efficiency, patient satisfaction, workforce productivity, and professional satisfaction.³ With the current and impending physician shortage and continued growth in patient demand, non-physician providers will continue to be strategically implemented in these various roles in an attempt to bolster a healthcare system that is in dire need of reform.

- ¹ "Interprofessional Healthcare: A Common Taxonomy to Assist with Understanding," by Alice B. Aiken, PT, PhD and Mary Ann McColl, PhD, Journal of Allied Health, Volume 38, Number 3 (Fall 2009), p. e-92.
- ² "Interprofessional Healthcare: A Common Taxonomy to Assist with Understanding," by Alice B. Aiken, PT, PhD and Mary Ann McColl, PhD, Journal of Allied Health, Volume 38, Number 3 (Fall 2009), p. e-94.
- ³ "Interprofessional Healthcare: A Common Taxonomy to Assist with Understanding," by Alice B. Aiken, PT, PhD and Mary Ann McColl, PhD, Journal of Allied Health, Volume 38, Number 3 (Fall 2009), p. e-92.



Founded in 1993, HCC is a nationally recognized healthcare economic financial consulting firm

- HCC Home
- Firm Profile
- HCC Services
- HCC Experts
- Clients Projects
- HCC News
- Upcoming Events
- Contact Us
- Email Us

HEALTH CAPITAL

CONSULTANTS (HCC) is an established, nationally recognized healthcare financial and economic consulting firm headquartered in St. Louis, Missouri, with regional personnel nationwide. Founded in 1993, HCC has served clients in over 45 states, in providing services including: valuation in all healthcare sectors; financial analysis, including the development of forecasts, budgets and income distribution plans; healthcare provider related intermediary services, including integration, affiliation, acquisition and divestiture; Certificate of Need (CON) and regulatory consulting; litigation support and expert witness services; and, industry research services for healthcare providers and their advisors. HCC's accredited professionals are supported by an experienced research and library support staff to maintain a thorough and extensive knowledge of the healthcare reimbursement, regulatory, technological and competitive environment.



Robert James Cimasi, MHA, ASA, FRICS, MCBA, AVA, CM&AA, serves as President of **HEALTH CAPITAL CONSULTANTS** (HCC), a nationally recognized healthcare financial and economic consulting firm headquartered in St. Louis, MO, serving clients in 49 states since 1993. Mr. Cimasi has over thirty years of experience in serving clients, with a professional focus on the financial and economic aspects of healthcare service sector entities including: valuation consulting and capital formation services; healthcare industry transactions including joint ventures, mergers, acquisitions, and divestitures; litigation support & expert testimony; and, certificate-of-need and other regulatory and policy planning consulting.

Mr. Cimasi holds a Masters in Health Administration from the University of Maryland, as well as several professional designations: Accredited Senior Appraiser (ASA – American Society of Appraisers); Fellow Royal Intuition of Chartered Surveyors (FRICS – Royal Institute of Chartered Surveyors); Master Certified Business Appraiser (MCBA – Institute of Business Appraisers); Accredited Valuation Analyst (AVA – National Association of Certified Valuators and Analysts); and, Certified Merger & Acquisition Advisor (CM&AA – Alliance of Merger & Acquisition Advisors). He has served as an expert witness on cases in numerous courts, and has provided testimony before federal and state legislative committees. He is a nationally known speaker on healthcare industry topics, the author of several books, the latest of which include: *"The U.S. Healthcare Certificate of Need Sourcebook"* [2005 - Beard Books], *"An Exciting Insight into the Healthcare Industry and Medical Practice Valuation"* [2002 – AICPA], and *"A Guide to Consulting Services for Emerging Healthcare Organizations"* [1999 John Wiley and Sons].

Mr. Cimasi is the author of numerous additional chapters in anthologies; books, and legal treatises; published articles in peer reviewed and industry trade journals; research papers and case studies; and, is often quoted by healthcare industry press. In 2006, Mr. Cimasi was honored with the prestigious *"Shannon Pratt Award in Business Valuation"* conferred by the Institute of Business Appraisers. Mr. Cimasi serves on the Editorial Board of the Business Appraisals Practice of the Institute of Business Appraisers, of which he is a member of the College of Fellows.



Todd A. Zigrang, MBA, MHA, ASA, FACHE, is the Senior Vice President of **HEALTH CAPITAL CONSULTANTS** (HCC), where he focuses on the areas valuation and financial analysis for hospitals and other healthcare enterprises. Mr. Zigrang has significant physician integration and financial analysis experience, and has participated in the development of a physician-owned multi-specialty MSO and networks involving a wide range of specialties; physician-owned hospitals, as well as several limited liability companies for the purpose of acquiring acute care and specialty hospitals, ASCs and other ancillary facilities; participated in the evaluation and negotiation of managed care contracts, performed and assisted in the valuation of various healthcare

entities and related litigation support engagements; created pro-forma financials; written business plans; conducted a range of industry research; completed due diligence practice analysis; overseen the selection process for vendors, contractors, and architects; and, worked on the arrangement of financing.

Mr. Zigrang holds a Master of Science in Health Administration and a Masters in Business Administration from the University of Missouri at Columbia, and is a Fellow of the American College of Healthcare Executives. He has co-authored "*Research and Financial Benchmarking in the Healthcare Industry*" (STP Financial Management) and "*Healthcare Industry Research and its Application in Financial Consulting*" (Aspen Publishers). He has additionally taught before the Institute of Business Appraisers and CPA Leadership Institute, and has presented healthcare industry valuation related research papers before the Healthcare Financial Management Association; the National CPA Health Care Adviser's Association; Association for Corporate Growth; Infocast Executive Education Series; the St. Louis Business Valuation Roundtable; and, Physician Hospitals of America.



Anne P. Sharamitaro, Esq., is the Vice President of HEALTH CAPITAL CONSULTANTS (HCC), where she focuses on the areas of Certificate of Need (CON); regulatory compliance, managed care, and antitrust consulting. Ms. Sharamitaro is a member of the Missouri Bar and holds a J.D. and Health Law Certificate from Saint Louis University School of Law, where she served as an editor for the Journal of Health Law, published by the American Health Lawyers Association. She has presented healthcare industry related research papers before Physician Hospitals of America and the National Association of Certified Valuation Analysts and co-authored chapters in *"Healthcare Organizations: Financial Management Strategies*," published in 2008.