



The ins and outs of working locums

Working in a locum tenens role can provide real value for both you and the employer on a short-term, interim basis.

LOCUM TENENS ARRANGEMENTS CAN BE A WIN-WIN: They help health care facilities and employers address staffing shortages on a short-term basis and provide willing and able physicians with work assignments.



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Locum tenens is Latin for “to hold the place of, to substitute for.” While many participants in the health care delivery space still colloquially call these type of arrangements locum tenens, the Centers for Medicare and Medicaid Services (CMS) no longer do. These relationships are, as of June 2017, officially referred to by CMS as Fee-For-Time Compensation Arrangements (FFTCA). (CMS made this change because a section title in the 21st Century Cures Act used locum tenens arrangements to describe both reciprocal billing arrangements and FFTCA and CMS did not want to cause any (further) confusion.)

Pursuant to CMS (for Medicare patients), a FFTCA must include each of the following elements:

- the regular physician is unavailable to provide the services;
- the Medicare patient has arranged or seeks to receive the services from the regular physician;
- the substitute physician does not provide the services to Medicare patients over a continuous period of longer

than 60 days (except for a physician called to active duty in the armed forces); and

- the regular physician indicates the services were provided by a substitute physician by using the Q5 modifier when submitting the CMS Form 1500 for services provided.

Hospital and health care systems in every community regularly engage FFTCA physicians when they need to supplement their physician staff. Follow these tips before you accept such a position.

Explore. You may consider an FFTCA opportunity if you’re between jobs or are considering locating to another part of the country. For a more junior physician, an FFTCA engagement can expand your professional network which may, in turn, create additional opportunities in the future.

Know that compensation varies. Although there may be plenty of opportunity for FFTCA work, there is no set or fixed compensation for the clinical services provided by the physician. It is critical to understand—before agreeing to the FFTCA engagement—what and when and how frequently you will be compensated.

Know your schedule. Understand the call frequency, the length, time and locations of the shifts, and the support you’ll receive from other staff and providers.

Everything will likely be new. With new patients,

new support staff, perhaps a new electronic medical records system, and new or different rules and regulations, you likely won't be as efficient in providing patient care. Be sure to understand how many patients or how many procedures you'll be expected to complete during a clinical shift. It will likely take longer; expectations should be set accordingly.

Plan for taxes. Staffing agencies engage the vast majority of FFTCA physicians as independent contractors, i.e., a 1099. Under this, you're responsible for making your own estimated tax payments (state and federal), and often obtaining health insurance coverage and other benefits. The compensation a 1099 FFTCA physician receives may seem very lucrative, but the taxes and other out-of-pocket costs may make the engagement actually less financially attractive.

The contract is still important. A physician accepting an FFTCA engagement should be sure to have the terms of the relationship accurately described in the contract. Many of the provisions that are relevant in a traditional physician contract also apply to a FFTCA relationship: schedule, termination and compensation. Confirm that professional liability insurance is included (including a "tail" if claims-made coverage is provided), and whether there is a noncompetition and/or non-solicitation clause. Also understand if there is the potential for a longer-term engagement with the facility.

How to get a FFTCA job

Be flexible. Health care organizations

value physicians who are willing to work nights or take weekend shifts, travel to less popular areas, and accept assignments that may be a little outside of their comfort zones. Not only does this help you become more well-rounded, but it also makes you more marketable.

Maintain a current CV. Every assignment you accept will vary in its responsibilities, patient assignment and particular challenges. Make sure your CV reflects your skill set accurately.

Focus on patient care. An FFTCA physician is hired on a short-term basis to address a physician shortage. You won't be expected to solve systemic issues affecting the facility or proactively address management challenges.

An FFTCA engagement is not the best fit for every physician. A physician who is interested in this type of opportunity should be prepared to be flexible and accommodating and do their homework before accepting the job. And be looking for the next engagement; by definition, a FFTCA job is short-term. •

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