# CLOSING PRACTICE CHECKLIST

## 90 - 120 Days Prior to Closing

<table>
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<th>Plan</th>
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<td>Develop a realistic timeline and establish a firm end date.</td>
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<th>Staff/Office</th>
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<tr>
<td>Organize a staff meeting to notify staff first of your decision and end date.</td>
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<tr>
<td>Maintain a simple message on your business voicemail regarding the closing of your practice and how emergency services can be obtained if necessary.</td>
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<tr>
<td>If your practice has an e-mail address for patients to contact, have a response informing them of the closing of the practice and how emergency services can be obtained.</td>
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<tr>
<td>Set a date when new referrals will not be accepted.</td>
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<th>Patients</th>
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<tr>
<td>Prepare and send notification/letter to patients listing the closing date and reason.</td>
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<tr>
<td>Include an authorization form to transfer medical records.</td>
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<td>List several physicians from whom patients might choose to receive care; explain how to get their prescriptions refilled and where to look for another physician.</td>
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<tr>
<td>Place a dated copy of the notification/letter in each patient’s medical record.</td>
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<td>New patients should be informed of the retiring date during the initial referral and given an opportunity to accept or deny services.</td>
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<th>The Public</th>
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<tr>
<td>Publish local newspaper ads with details about closing.</td>
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<td>Post signage in your office to notify visitors of your last day of business.</td>
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<th>Professional Associations</th>
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<td>Notify the State medical board, licensing board, credentialing organizations, professional memberships, medical societies, etc.</td>
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<tr>
<td>The American Medical Association (AMA) maintains a national registry of physicians. Contact the AMA of address change. American Medical Association 515 State Street, Chicago, Illinois 60610 312-464-5759</td>
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<tr>
<th>Drug Enforcement Agency (DEA)</th>
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<tr>
<td>Notify the DEA in writing of your wishes to either continue or surrender your DEA registration. Enclose the DEA Controlled Substance Certificate, Form 222 for Schedule I &amp; II drugs. Arkansas: 501-217-6500 10825 Financial Centre Parkway Little Rock, AR 72211</td>
</tr>
</tbody>
</table>
Inform the DEA of the closure or relocation of your practice.

Dispose or surrender of your drugs properly. The Little Rock DEA website is below. Look under Resources on how to dispose/surrender drugs.
http://www.deadiversion.usdoj.gov/

Contact the Arkansas Department of Health regarding return of expired or unwanted controlled substances.
4815 W. Markham Street, Slot 25, Little Rock, AR  72205
501-661-2325

All controlled dangerous substances records and inventories must be maintained at least 2 years.

Health Insurance Companies

Inform all contracted payers of your intent to close your practice.

Provide payers with a forwarding address to send payments that resolve after the office closes.

Medicare and Medicaid

Send written notification of retirement, if applicable, to Medicare and Medicaid.
National Government Services, Inc.
P.O. Box 6230
Indianapolis, IN  46206-6230

Complete forms to change status of Medicare participation:

Place your national Provider Identifier (NPI) number in inactive status, if applicable.
1-800-465-3203
https://nppes.cms.hhs.gov to change your NPI status online

Hospitals

Notify the hospital(s) where you have privileges of your intention to close your practice.

Inform the medical staff in writing you are leaving the medical staff voluntarily and in good standing, if applicable.

Ancillary Services

Contact labs, MRI facilities, etc. that you refer patients to.

 Suppliers, Service Contracts

Notify medical suppliers, office suppliers, collection agencies, laundry services, housekeeping services, hazardous waste disposal services, magazine subscriptions, etc.

Request final statements from these vendors to close your accounts with them.

Other Physicians

Notify your colleagues either in writing or by phone about your decision and end time. Your colleagues are those you work with, refer to or receive referrals from.
### 30-60 Days Prior to Closing

#### Patient Scheduling
- No new patients should be accepted.
- Begin restricting non-emergency appointments.
- Patients who need continued follow-up care should be referred to another provider.

#### Accounts Receivable
- Process accounts receivable, as much as possible, to collect money owed to you.
- Consider employing a collection agency or staff member to reconcile accounts after the practice has closed.
- Check with your bank. Generally bank accounts can be kept open for 60-90 days after closure in order to resolve accounts payable and payment of any final bills.

#### Insurance Policies
- Review your and your employee’s insurance policies and update or cancel where appropriate, i.e., health, life, disability, workers compensation, business liability, cyber insurance, etc.
- Notify your medical malpractice carrier and obtain/verify tail coverage extended liability coverage.

#### Website
- If you have a practice website, place a notice on the website of the date of the closure.
- Block any contacts or e-mails to the website.
- Close the website.

#### Medical Records
- Arrange for safe storage for both paper and electronic medical records. (It may be possible to pay for storage at a neighboring medical office or use a secure document storage facility.)
- Execute a Business Associate Agreement with the custodian of the facility who is safeguarding the medical records.
- Ensure the facility has experience handling confidential patient information and has safeguards in place to prevent theft.
- Notify the Arkansas state medical board of the storage location.

#### Retention time frames: Refer to Risk Management; Best Practices; Closure: page 10:
- [http://arkansasasmutual.com/](http://arkansasasmutual.com/)
  - All medical records – 10 years after the last patient visit or discharge date
  - Minors – 2 years after the age of majority (age 20) or 10 years after last visit; whichever is longer
  - Medicare/Medicaid – 7 years
  - HIPAA – 6 years
  - Immunizations records – permanently
  - Diagnostic records – 5 years from the date of the procedure
  - Fetal heart monitor strips – same as for minors

- Establish a mailing address or P.O. Box for medical record request after closing.
## Clinic Documents & Equipment

Arrange for storage of personnel records according to state law.

- [http://www.dfa.arkansas.gov/offices/intergovernmentalServices/Documents/rec_retention_scheduled.pdf](http://www.dfa.arkansas.gov/offices/intergovernmentalServices/Documents/rec_retention_scheduled.pdf) - website for Arkansas Records Retention Schedule – for state agencies

- [http://www.shrm.org/legalissues/stateandlocalresources/stateandlocalstatutesandregulations/documents/recordkeeping-access%20to%20files.pdf](http://www.shrm.org/legalissues/stateandlocalresources/stateandlocalstatutesandregulations/documents/recordkeeping-access%20to%20files.pdf) - Arkansas

It is generally recommended to keep records for a minimum of three years. HIPAA requires retention of 6 years of all HIPAA related documents.

Organize for the disposal or proper storage of clinic documents such as patient education materials, brochures, etc.

Retain financial records for seven (7) years before being safely destroyed.

Plan to sell or lease office and medical equipment, if applicable.

## Medications

See above DEA section and follow federal guidelines for disposing of prescription drugs.

Contact drug representatives to determine what to do with unused samples, if any.

Destroy all prescription pads in a secure manner.

## Phone Service

Consider an answering service or prepared messaging for your office phone calls after the closing date.

Inform your answering service of the date of closure and end date.

Notify the phone company of date for disconnection, if applicable.

## Utilities

Contact the U.S. Postal Service to coordinate mail forwarding details.

Inform utility and service providers (gas, electric, cable, etc.) of closure date.

## Office Space

If space is leased, review lease for specifics on termination and notify landlord of vacating date.

If owned, consult with advisors to decide if the property should be sold, leased or maintained.

Locate sources for the sale of office furniture or donation.

## Computers

Do not sell or donate computers with patient information unless you remove hard drives and physically destroy by breaking up the discs in the hard drive.

Store the computer’s hard drive with patient information in a secure facility.

## Legal

Contact an attorney for specific business and legal advice when closing a practice/corporation to assist with the help to dissolve the entity.

Consult advice of competent legal counsel prior to the destruction of any record, medical or financial.

Contact an accountant who can file taxes and help with retirement plan.