

The ABCs of RHCs

April 28, 2011

2nd Annual Alabama Rural Health Conference



What is an RHC?

It's a cost based reimbursed federal program for Medicare and Medicaid patients in a primary care office



What is required to be an RHC?

- Be located in a non-urbanized area
- Be located in a Medically Underserved area (MUA) or Health Professional Shortage Area (HPSA)
- Provide outpatient primary care services
- Use the services of a mid-level (PA, NP, or CNW) at least 50% of clinic hours



RHC Requirements – cont.

The non-urbanized area and designated shortage areas must have been updated within the last four (4) years



Two Types of RHCs

<u>Provider Based</u> – Owned and operated by a hospital, skilled nursing home or home health agency

Free Standing (Independent) – Owned and operated by a physician, NP, PA, or CNW



Why are you an RHC?

- Higher Reimbursement from Medicare and Medicaid
- Higher Reimbursement for Flu and Pneumonia Shots
- No reduced payment for NP & PA services
- Payment of Medicare Bad Debt





Conditions for Participation

- Compliance with Federal, State and Local Laws
- Location of Clinic
- Physical Plant and Environment
- Organizational Structure
- Provision of Services
- Patient Health Records
- Program Evaluation





Compliance with Federal, State and Local Laws

Staff of the clinic are licensed, certified or registered in accordance with applicable State and Local laws



Location of the Clinic

An RHC must be located in a rural area that is designated as a shortage area – (which has been updated within the last four years)



Physical Plant and Environment

- 1. <u>Physical Plant Safety</u> Maintained consistent with State and local building, fire and safety codes
- 2. <u>Preventive Maintenance</u> All essential mechanical, electrical and patient-care equipment is maintained in safe operating condition (at least yearly)



Preventive Maintenance - cont.

Drugs and biologicals are appropriately stored; "No expired drugs!!"

The clinic is clean and orderly.



Non-Medical Emergencies

The clinic assures the safety of patients in case of non-medical emergencies by:

- 1. Training staff in handling emergencies
- 2. Placing exit signs in appropriate locations
- 3. Taking other appropriate measures such as: Bomb, Fire and Severe Weather Drills



Organizational Structure

Basic Requirement

- The clinic is under the direction of a Medical Director;
- Written material covering organization policies, including lines of authority and responsibilities. Written policies should consist of both administrative and patient care policies.



Organizational Structure (cont.)

• Disclosure of Names and Addresses: The clinic discloses names and addresses of the owner, person responsible for directing the clinic's operation and physician responsible for medical direction.



Sufficient Staffing

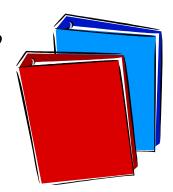
The staff is sufficient to provide the services essential to the operation of the clinic.

Mid-level must be present 50% of clinic hours; and Medical Director must be on site at least once every two weeks.



Staff Respsonsibilies

The Medical Director in conjunction with the mid-level participates in the developing, executing and periodically reviewing the clinic's written policies and procedures;



Periodically, reviews the clinic's patient records.



Provision of Services

Each RHC must be capable of providing out-patient primary care services;



Provision of Services

Provides basic laboratory services:

- * Chemical examinations of urine
- * Hemoglobin or Hematocrit
- * Blood sugar
- * Examination of stool specimens for occult blood
- * Pregnancy test
- * Primary culturing for transmittal



Patient Health Records

Must maintain patient health records in accordance with its written policies and procedures;

Must be the responsibility of a designated member of staff;

All records should be kept at the clinic site;



Patient Health Records - cont.

Must examine a randomly selected sample of health records and must be signed off by Medical Director and mid-level;

Must ensure the confidentiality of the patient's health records and provide safeguards against loss, destruction or unauthorized use of record information;



Patient Health Records - cont.

Retention of Records – must retain records for at least 6 years from the last entry date or longer if required by State statue.



Annual Program Evaluation

The clinic carries out, or arranges for, an annual evaluation of its total program to include:

- 1) the utilization of clinic services including number of patients served.
- 2) random sample of both active and closed records (10 open and 5 closed)
- 3) The clinic's health care policies.



Annual Program Evaluation – cont.

The purpose of the evaluation is to determine:

- 1) The utilization of services were appropriate;
- 2) The established policies were followed; and
- 3) Any changes are needed.

The clinic staff considers the findings and takes corrective action if necessary.

A B C s

Do you want to stay an RHC?

Then.... You must abide by all the rules and regulations cited above.



Recertification

Periodic on-site survey (at least once every 6 years;)

Unannounced

Review of RHC Conditions of Participation

Deficiencies: None? Standard? Condition?

Follow-up: Onsite or by mail

Plan of Correction: Deficiencies corrected.



Clinic Survey Tour

- Drug samples
- Autoclave
- Exit signs
- Posted fire regulations
- Medical records
- Schedule II drugs
- Handicapped access



Clinic Survey Tour - cont.

- Premises clean and orderly
- Infection control issues
- Preventive maintenance
- Fire safety
- Storage of medications



When to notify State Agency

- Change of ownership
- Move to a new location
- Loss of NP or PA
- Staffing waiver request
- Change in Medical Director
- New NP or PA
- Termination of RHC
- New clinic to be certified





Alabama State Agency Contact

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Department of Public Health

Division of Provider Services

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Cost Reports

Medicare – due to Cahaba GBA 5 months after fiscal year end. Ex: If your year end is 12/31/10, then it is due to Cahaba GBA no later than 5/31/11.



Provider Summary and Report (PS&R)

In order to obtain your PS&R, you must have User ID and password form CMS' Authorized Access to CMS Computer Systems (IACS)



IACS Registration

External User Services Help Desk –

866-484-8049; or

EUSSupport@cgi.com

Henry Vick – 205-220-1994



Cost Report Address:

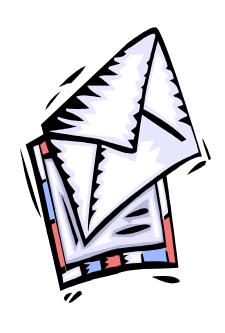
Mr. Randy Moon

PAAR

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Medicaid –

A projected cost report is submitted to the Medicaid Agency at time of enrollment as RHC to establish the all-inclusive encounter rate. However, if scope of services changes, additional information will need to be submitted for consideration of increase of rate.



Cahaba GBA Contacts

• <u>Enrollment</u> – Gary Gray 205-220-1702

• <u>Cost Reports</u> - Randy Moon 205-220-1305



• EDI – 866-582-3253



Alabama Medicaid Contacts

Carol Akin, Associate Director
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"Mission Statement"

Make friends with the People who Decide Policies & Oversee Coverage & Billing for your State

Attend Hearings & RHC Meetings

Get Handouts if You Cannot Attend

Do NOT Be Afraid to Ask Questions.



SC Office of Rural Health

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Questions?