



health services associates

RHC Regulations and Daily Implementation Strategies

EXPERT RURAL HEALTH CONSULTANTS



Participants will:

- Identify the unique rules and regulations for the RHC
- Discover helpful tools for maintaining compliance at the clinic
- Develop an evidence binder as proof of compliance

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



What is an RHC?

- It is a cost based reimbursed federal program for Medicare and Medicaid patients in a primary care office.
- RHC's have a bundled payment, or All-Inclusive Rate (AIR) per visit, for qualified primary care and preventive health services an RHC practitioner provides.

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



RHC Services

- RHC visits must be:
 - Medically necessary
 - Medical or mental health visits, qualified preventive health visits or face-to-face visits between patient and RHC practitioner
 - A qualified RHC service needing an RHC practitioner

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



RHC Services

- Types of services:
 - Family practice
 - Internal medicine
 - Pediatrics
 - OB-GYN
 - Some care management services
 - Some virtual communication services

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



RHC Practitioners

- Physician
- Nurse Practitioner (NP)
- Physician Assistant (PA)
- Certified Nurse-Midwife (CNM)
- Clinical Psychologist (CP)
- Clinical Social Worker (CSW)
- Marriage and Family Therapist (MFT)
- Mental Health Counselors (MHC)
 - Addiction, drug, or alcohol counselors who meet requirements of MHCs to enroll with Medicare

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



Location of Visits

- RHC
- Patient's home
- Medicare-covered Part A skilled nursing facility
- Scene of an accident
- Hospice

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



Two Types of RHCs

- Provider based
 - Owned and operated by a hospital, skilled nursing home or home health agency
- Free standing (independent)
 - Standalone clinics owned by a physician, NP, PA, or CNM, but may be owned by hospitals

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



Basic Requirements

- Be located in a non-urbanized area
- Be located in a current (4 years) medically underserved area (MUA) or a health professional shortage area (HPSA)
- Provide outpatient primary care services
- Use the services of an advanced practice provider at least 50% of clinic hours

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net

Conditions for Certification

- 42 Code of Federal Regulations (CFR) 491.1-491.12
 - Purpose and scope
 - Definitions
 - Certification procedures
 - Compliance with Federal, State and local laws
 - Location of clinic
 - Physical plant and environment
 - Organizational structure
 - Staffing and staff responsibilities
 - Provision of services
 - Patient health records
 - Program evaluation
 - Emergency preparedness



Need to Know

- You must abide by all the rules and regulations cited.
- The guidelines are everyday expectations for the clinic to operate.
- Surveying Entities:
 - The Compliance Team (TCT)
 - QUAD A
 - State
 - The Joint Commission (TJC)

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



Is There Follow Up?

- Periodic on-site unannounced survey
- Review of RHC conditions of certification
- Deficiencies
 - Zero deficiencies
 - Standard level
 - Condition level
 - Immediate jeopardy
- Plan of correction for any deficiency found

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net



Day of Survey

- Policy review
- Emergency plan review
- Evidence review
- Physical plant review
- Chart audit
- HR audit

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net

Conditions for Certification

- 42 Code of Federal Regulations (CFR) 491.1-491.5
 - Purpose and scope
 - Definitions
 - Provider definitions
 - Direct services definition
 - What is rural
 - Certification procedures
 - Compliance with Federal, State and local laws
 - Will discuss in the HR audit session
 - Location of clinic
 - Caution – Relocation
 - Mobile/permanent structures

Compliance Spectrum

- Physical Plant
 - Entrance
 - Equipment
 - Medications
 - Supplies
 - Infection control
 - Laboratory services
 - Safety
 - Housekeeping
 - Postings

Conditions for Certification

- 42 Code of Federal Regulations (CFR) 491.9
 - Provision of services
 - Primarily engaged in outpatient health services
 - Patient care policies
 - Direct services
 - General
 - Laboratory
 - Emergency services
 - Services provided through agreements or arrangements
 - Inpatient hospital care
 - Other physician services (ie. skilled nursing facility)
 - Additional diagnostic/laboratory services not available at the clinic
 - Evidence that patients are accepted OR written agreement

Conditions for Certification

- 491.9 Laboratory. These requirements apply to RHCs but not to FQHCs. The RHC provides laboratory services in accordance with part 493 of this chapter, which implements the provisions of section 353 of the Public Health Service Act. The RHC provides basic laboratory services essential to the immediate diagnosis and treatment of the patient, including:
 - Chemical examinations of urine by stick or tablet method or both (including urine ketones);
 - Hemoglobin or hematocrit;
 - Blood glucose;
 - Examination of stool specimens for occult blood;
 - Pregnancy tests; and
 - Primary culturing for transmittal to a certified laboratory.

Conditions for Certification

- 491.9 Emergency. The clinic or center provides medical emergency procedures as a first response to common life-threatening injuries and acute illness and has available the drugs and biologicals commonly used in life saving procedures, such as analgesics, anesthetics (local), antibiotics, anticonvulsants, antidotes and emetics, serums and toxoids.

Conditions for Certification

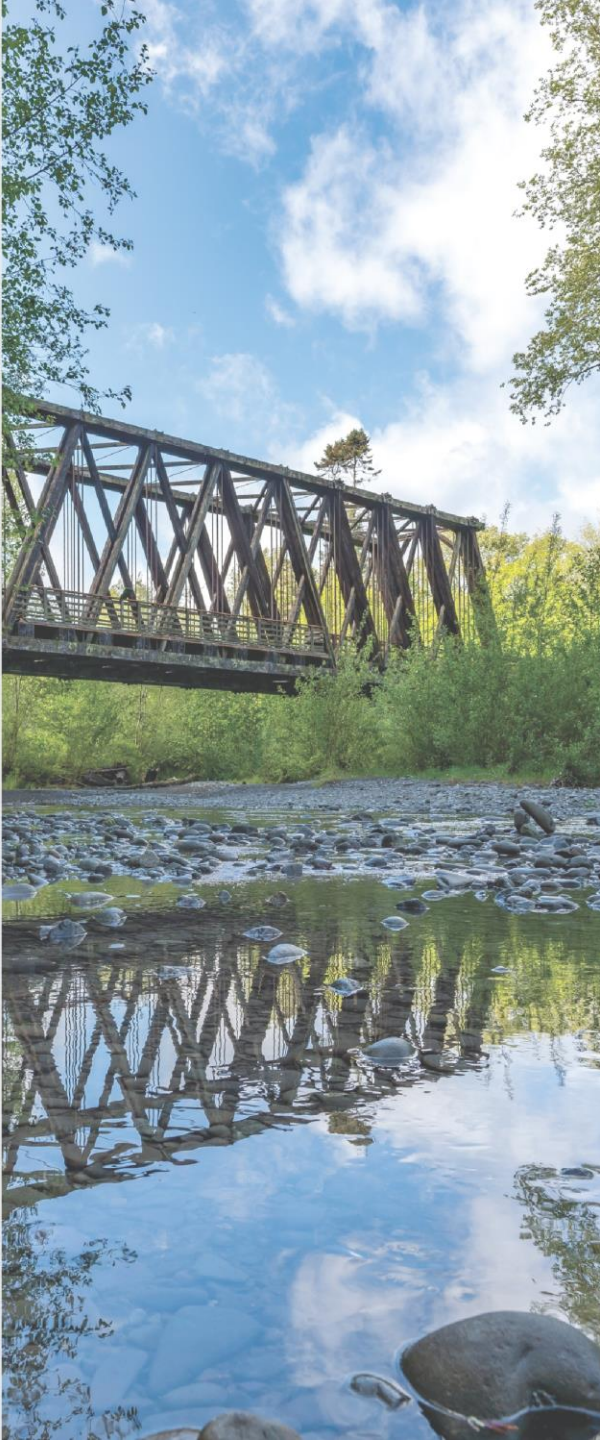
- 491.9 Emergency. The clinic or center provides medical emergency procedures as a first response to common life-threatening injuries and acute illness and has available the drugs and biologicals commonly used in life saving procedures, such as analgesics, anesthetics (local), antibiotics, anticonvulsants, antidotes and emetics, serums and toxoids.

Conditions for Certification

- 491.9 RHC Policies
 - The clinic's or center's health care services are furnished in accordance with appropriate written policies which are consistent with applicable State law.
 - The policies are developed with the advice of a group of professional personnel that includes one or more physicians and one or more physician assistants or nurse practitioners. At least one member is not a member of the clinic or center staff.
 - The policies include:
 - A description of the services the clinic or center furnishes directly and those furnished through agreement or arrangement.
 - Guidelines for the medical management of health problems which include the conditions requiring medical consultation and/or patient referral, the maintenance of health care records, and procedures for the periodic review and evaluation of the services furnished by the clinic or center.
 - Rules for the storage, handling, and administration of drugs and biologicals.
 - These policies are reviewed at least biennially by the group of professional personnel required under paragraph (b)(2) of this section and reviewed as necessary by the RHC or FQHC.

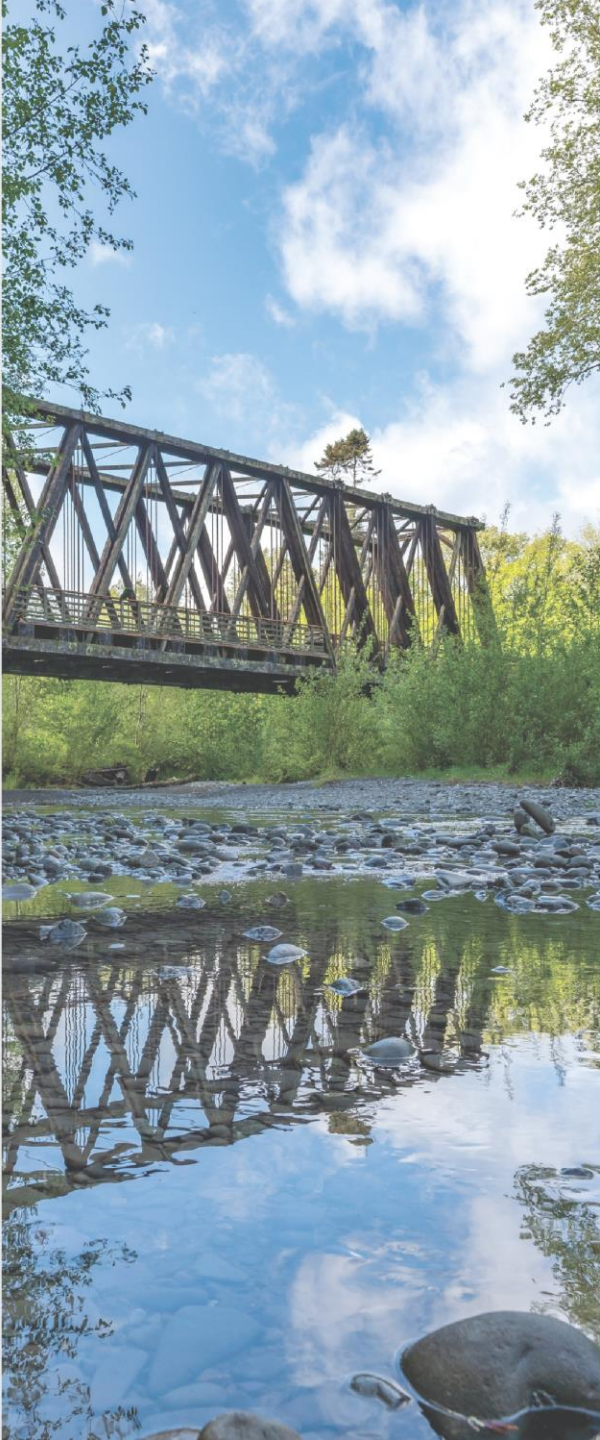
RHC Policies:

- Administration
 - Corporate referral
 - Services
 - Patient complaints
 - Patient rights/responsibilities
 - Smoke free environment



RHC Policies:

- Physical Plant
 - Cleaning
 - Exposure control
 - Hazardous materials
 - Medical waste
 - Pest control
 - Physical plant and environment
 - Preventive maintenance



A vertical photograph on the left side of the slide shows a wooden truss bridge spanning a river. The bridge's structure is reflected in the calm water below. The surrounding area is lush with green trees and foliage under a blue sky with scattered white clouds.

RHC Policies:

- Human Resources
 - Referral
 - Organizational structure
 - Job descriptions
 - Mandatory reporting
 - Personnel files
 - Staff requirements and training
 - Disciplinary/corrective action
 - Standards of conduct



RHC Policies:

- Patient Care
 - Medical management
 - Medications
 - Treatment of minors
 - Contagious patient
 - Emergency care
 - Established/New patient
 - Consent



RHC Policies:

- Patient Care
 - Laboratory services
 - General/Informed Consent
 - Referral process
 - Sterile supplies
 - Standard precautions
 - Incident reporting



RHC Policies:

- HIPAA
 - Referral
 - Storage
 - Retention
 - Release
 - Security
 - Privacy



RHC Policies:

- Civil rights
 - Nondiscrimination
 - Grievance
 - Limited English
 - Interpretive services
- Auxiliary Aids
- Accessibility



RHC Policies:

- Radiology
 - Patient refusal
 - Imaging bariatric patients
 - Patient recall
 - Release of diagnostic imaging
 - Provider orders
 - Safety
 - Operation of equipment
 - Infection control

Conditions for Certification

- 42 Code of Federal Regulations (CFR) 491.10-491.12
 - Patient health records
 - Will discuss in the HR/Chart audit session
 - Program evaluation
 - Will discuss in the Ongoing Compliance session
 - Emergency preparedness
 - Will discuss in the Ongoing Compliance session



INSERT CLINIC LOGO

RHC Evidence Binder

Table of Contents

- I. Certification Tab 1**
 - A. HPSA Designation
 - B. Final Tie-in Notice
 - C. Most recent survey results
 - D. Copy of CLIA
- II. Physical Plant..... Tab 2**
 - E. Equipment Inspection Log
 - F. Clinic Floor Plan
 - G. Fire/Tornado Drill Reports
 - H. Cleaning Logs
 - I. AED, Oxygen, and Fire Extinguisher Logs
 - J. Environmental Rounding Logs
- III. Chart Audits..... Tab 3**
 - K. Quarterly Collaborative Chart Audits
 - L. Administrative Chart Audits
- IV. Program Evaluation Tab 4**
 - M. Meeting Minutes
- V. Staff Information Tab 5**
 - N. Organizational Chart
 - O. Roster of Staff with FTE Status
 - P. Non-Physician Practitioner Schedule
 - Q. Provider CV, License, DEA, and BLS
 - R. Clinical Staff Certification and BLS

Additional Binder Locations

Policy Manual	<u>INSERT LOCATION</u>
Emergency Plan	<u>INSERT LOCATION</u>
Sample Medication Logs	<u>INSERT LOCATION</u>
SDS Sheets	<u>INSERT LOCATION</u>
Lab Control Logs	<u>INSERT LOCATION</u>



Resources

- [42 CFR 491.1-491.12](#)
- Accrediting Organization's (AO) surveying standards
- [Appendix G](#)
- [Appendix Z](#)
- [MLN Matters](#)
- [OCR Website](#)

EXPERT RURAL HEALTH CONSULTANTS

[**www.hsagroup.net**](http://www.hsagroup.net)



Tressa Sacrey
Director, Compliance and
Education
tsacrey@hsagroup.net
www.hsagroup.net

EXPERT RURAL HEALTH CONSULTANTS

www.hsagroup.net

