

#### SOUTH CAROLINA OFFICE OF RURAL HEALTH

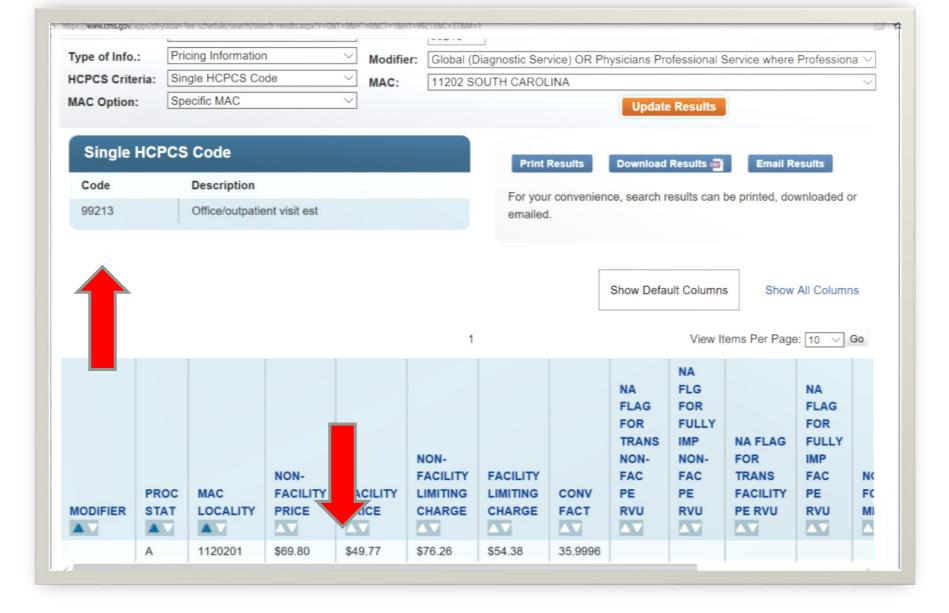
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Rural Health Clinic Overview Shannon Chambers

#### Financials

- Clinic receives an All Inclusive Rate (AIR) for services
- Independent Clinic- Current Independent RHC Rate is: \$84.70
- Provider Based Clinic tied to a hospital with less than 50 beds-Rate is uncapped but based on cost.
- AIR is paid for visit and/or procedure(s)
- Labs are reimbursed under the Medicare Fee Schedule same as a regular Fee for Service Clinic (Independent) or reimbursed under the hospital numbers just like the patient walked into the hospital to have the services completed (Provider-Based).







#### Location, Location, Location

- Rural Health Clinics must be located in communities that are both "rural" and "underserved". For purposes of the Rural Health Clinics Act, the following definitions apply to these terms:
  - Rural Areas Census Bureau designation as "Nonurbanized"
  - Shortage Area a federally designated Health Professional Shortage Area, a federally designated Medically Underserved Area



#### **RHC** Services

RHCs furnish:

- Physician services
- Services and supplies incident to the services of a physician
- NP, PA, certified nurse-midwife (CNM), clinical psychologist (CP), and clinical social worker (CSW) services
- Services and supplies incident to the services of a NP, PA, CNM, CP, and CSW
- Medicare Part B-covered drugs furnished by and "incident to" services of an RHC practitioner.



#### RHCs Must

- Employ a NP or PA (RHCs may contract with NPs, PAs, CNMs, CPs, and CSWs when at least one NP or PA is employed by the RHC)
- Have a NP, PA, or CNM working at the clinic at least 50 percent of the time the RHC operates.
- Directly furnish routine diagnostic and laboratory services
- Have arrangements with one or more hospitals to furnish medically necessary services that are not available at the RHC
- Have available drugs and biologicals necessary for the treatment of emergencies



#### Labs

- Furnish all of these laboratory tests onsite:
- Chemical examination of urine by stick or tablet method or both
- Hemoglobin or hematocrit
- Blood sugar
- Examination of stool specimens for occult blood
- Pregnancy tests
- Primary culturing for transmittal to a certified laboratory



#### The Rules - 42 CFR 491

This is the Code of Federal Regulations (CFR) which stipulates rural health clinics' conditions for certification.

<u>http://www.cms.gov/Regulations-and-</u> <u>Guidance/Legislation/CFCsAndCoPs/RHC\_FQHC.html</u>

• 12 Sections!!



#### Policy Manual Requirements

- Written policies should consist of both administrative and patient care policies. Policies should be specific to your clinic even if owned by a hospital.
- In addition to including lines of authority and responsibilities, administrative policies may cover topics such as personnel, fiscal, purchasing, and maintenance of building and equipment.
- A description of the services that the clinic furnishes directly and those furnished through agreement or arrangement.

Inpatient Hospital Care

Physician Services

Any additional x-ray or specialized lab services that aren't available onsite



- It MUST be documented that the Medical Director and NP/PA review all policies annually. This can be achieved by signing and dating the manual annually!!
- Make sure that an annual policy review/update is documented. Include the physician/np/outside member! (Your Committee)
- Organize Manual according to RHC regulations.
- Keep business, personnel, and medical licenses current!! Maintain all CPR staff certifications as well.



- Make sure that patient care and administrative polices are included and current!
- Update and Maintain the organizational chart.
- Assign one person and an alternate responsibility for the manual in case of inspection. The manual should be available for any inspector at any time.



#### Policy and Procedure Manual

- <u>**Tab 1**</u>-Organizational Chart and List of Employees
- <u>Tab 2</u>-Clinic Information/ Copies of Professional Licenses for Physicians and Mid-levels

✓ Medical License

✓ CVs

✓ NP/PA Protocols

- Drug Enforcement Authority Prescriptive Permit
  - ✓ Certificate of Liability Insurance

✓ CLIA Certificate

✓ Business License



- <u>Tab 3</u>- Agreements-
  - ✓ Medical Director
  - ✓ Hospital Privileges
  - ✓ Laboratory Agreement
  - ✓ Bio-Waste Agreement
  - ✓ Confidentiality Agreement (If outside cleaning crew)
- <u>**Tab 4**</u>- Periodic Chart Reviews- Follow your policy
- <u>**Tab 5**</u>- Disaster Drills- Fire Drill, Bomb Threat, Severe weather, Evacuation Plan



• <u>Tab 6</u>-Preventative Maintenance

✓ Copy of letter from certified electrician
✓ CPR Certification
✓ Refrigerator temperature log

• <u>Tab 7</u>-Miscellaneous

Exam Room Cleaning Chart
Checklist for Sample Drugs
Emergency Kit- Supplies list out
Encounter Form
Anti-Discrimination Policy



- <u>Tab 8-</u> Prior Annual Evaluations
  - ✓ Annual Evaluation Typed up document that lays out what you found during review. This is where you want to catch errors so inspector doesn't. Signed by committee members.
  - ✓ Annual Clinic Inspection- Look at your clinic from the eyes of a two year old.
  - ✓ Annual Chart Review (10 Active and 5 Inactive)



#### Annual Evaluation

- Purpose of the evaluation is to determine whether:
  - ➤ 1. The utilization of services was appropriate.
  - ➤ 2. The established policies were followed
  - ➤ 3. Any changes are needed





#### Annual Evaluation Report

- Report should consist of all findings from Walkthrough, Chart Audit and Policy review.
- Should be signed by all committee members





# Clinic Walkthrough

- A clinic walkthrough must be completed as part of your Annual Evaluation.
- This includes:
  - ≻Room Review
  - ≻Waiting Room
  - ➢ Bathrooms
  - ➢Supplies
  - Medications
  - ≻Equipment
  - ➤Staff Education



#### Physical Plant and Environment

- Exit signs are clearly marked at each exit.
- Exit routes are free of barriers. Doors are locked from outside but allow exit from inside.
- Diagrams indicating Emergency exits are present.
- Clinic is clear of clutter and is clean.
- Fire extinguishers are checked monthly by staff
- Fire Drills and emergency drills are conducted and documented at least annually.
- Overhead ceiling lights are free of bugs and debris.
- Clinic does not have any exposed building materials.



- Electrical sockets are covered when not in use.
- Bathroom/clinic is handicapped accessible.
- Clinic has handicap parking spots.
- Bathrooms do not contain personal hygiene products
- Adult and Pediatric scales are balanced at least annually.
- AED is maintained and tested in accordance with manufacturer recommendations
- Cleaning policies are in place and followed
- List of all equipment by manufacturer, model and serial number.
- Preventive maintenance due dates are tracked.



#### Laboratory

- The lab has a CLIA certificate
- Refrigerator and Freezer temperatures are recorded daily.
- Lab Equipment is calibrated accordingly.
- External control results are logged.
- No food is stored in refrigerators that are used for vaccines/samples.
- Nothing is stored on the door in a freezer or refrigerator.
- Reagents strips and supplies are dated when opened?



# Drugs and Biologicals

- Drug samples are reviewed monthly and documented.
- Samples are stored in a secure area without patient access.
- Samples are logged should a recall be issued. If completed in EMR, ensure that you are able to run a report on it.
- All medications are stored with no patient access.
- Multidose vials, ointments, and solutions are dated when opened and discarded in accordance with policy.
- Expired medications, biologicals, and supplies are discarded in accordance with policy.



#### Controlled Meds

- All controlled meds should be double locked and all transactions recorded.
- Log should be verified weekly by management.





#### Room Review

- Do not contain hazardous materials. (Cleaners, drug samples, etc.)
- Nothing is under the sinks.
- Electrical Outlets are covered when not in use.
- Sharps containers are secured
- All supplies are in date.
- Supplies should be clean with no dust or debris.
- Equipment is cleaned and disinfected prior to each patient's use.
- Equipment is not stored on floor.



- Preventative Maintenance stickers on appropriate equipment.
- Exam tables do not contain rips or tears
- Countertops are clean and not cracked.
- Review lights, walls, and flooring.
- No meds in patient rooms



# Monthly Logs

- Sample Closet
- Emergency Kit
- Oxygen
- AED- Visual Check, Battery Check, Pads,
- Eye Wash Station (Weekly)







#### Staffing

- Change in Staff since last annual review?
- PPD status
- Staff is performing as expected no clinical or administrative actions.
- BLS Certified?
- Staff have participated in emergency training?





#### Additional Items

- Hours of operation are posted
- CPR certification is up to date
- Improvements in the office or Parking Lot?
- Adding or Changing EMRs?
- Any new services that you are providing?
- Medical director is identified
- Owner of clinic is disclosed and documented.



#### Annual Chart Review

- 10 Active Charts and 5 inactive charts.
- 5 inactive- Transferred, Terminated or Deceased.
- When reviewing charts we are looking for the following:
  - ✓ Records are in good order- Vitals, Current Meds, Clean and clear documentation.
  - ✓ Labs, radiology and consults were recorded and documented.
  - ✓ Authorization to treat
  - ✓ Insurance verification
  - ✓ Provider signature
  - ✓ HIPAA



#### **Emergency Preparedness**

- Must address an emergency on-site, off-site and disruption of service.
  - Developing the RHC EP Plan
  - EP Policy and Procedures
  - EP Communication Plan
  - EP Training and Testing Program



#### Questions???





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Shannon Chambers, CPC, CRCA, RH-CBS, CH-CBS AHIMA Approved ICD 10 CM/PCS Trainer AHIMA Ambassador Director of Provider Solutions Chambers@scorh.net

#### Social:

Website: scorh.net Address: 107 Saluda Pointe Drive Lexington, SC 29072 Phone:

Phone: 803-454-3850