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RHC Policies and Procedures Healthcare Business Specialists

November 3, 2015





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Presentation Materials

We have provided documents including this presentation, a Policy and Procedure Manual, and Mock Inspection Report. We have provided a USB Drive with resources.





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Agenda for Presentation

50 minutes of slides

- 1. Objectives of the manual**
- 2. Resources**
- 3. A sample Policy Manual**
- 4. Questions**





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Questions?

We have a small group so go ahead and ask questions during the presentation. If we get behind, I will ask you to wait until the end.

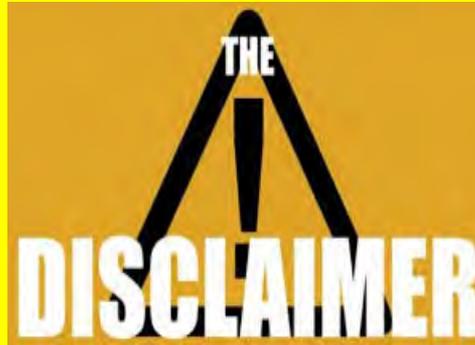
Plus, you don't really want to hear me talk for 3 straight hours.





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- 1. Information is current as of 10/31/2015.**
- 2. I am not young enough to know everything. Policies cover lots different areas – You may need experts in each area.**
- 3. We are not in Kansas anymore – every State is different. Every Inspector is different.**



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The Two Types of Inspectors



**Some inspections are very difficult
And some are not. A lot depends on
The inspector.**



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RHC Policies and Procedures



Why? Required to become a RHC



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Goal of this Webinar – Provide Resources



Keep you from reinventing the Wheel



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Objectives of a RHC P & P Manual



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What the RHC P & P Manual Does



Provides written documentation of the processes and procedures to ensure compliance with RHC Regulations



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Who is the audience for the RHC Policy and Procedure Manual

- A. Review the standards of each and address.
- B. Provide them with copies of documents

1. State Inspector
2. AAAASF
3. The Compliance Team
4. Provider-based Attestation
5. Employees





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Should the RHC Manual have detailed policies regarding...?

HIPAA	OSHA	CLIA/COLA
Compliance	Employee Benefits	Administration
Billing	Office Management	Personnel

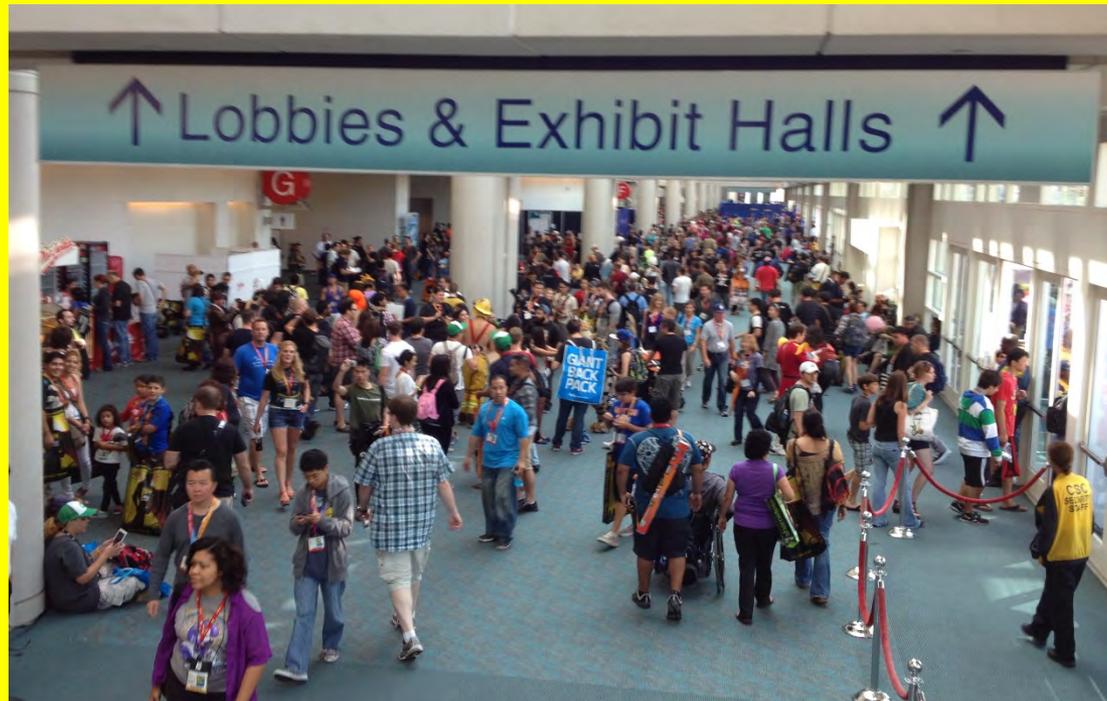
No, you do not have to redo all your policy manuals into one. You may refer to them in the RHC P and P manual. Focus the RHC P and P manual on RHC compliance.



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Go to the NARHC and NRHA meetings and talk to the Vendors





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Find Experts in Specific Areas

Expertise Area	Name/Company/Phone	Website
HIPAA	Sarah Badahman HIPAAtrek 618-334-1474 (cell)	hipaatrek.com
Corp. Compliance	Margaret Scavotto, JD Management Performance Associates Phone: 314-434-4227	healthcareperformance.com/ mcs@healthcareperformance.com
Shortage Areas	Joe Lampard HPSA Acumen Phone: (716) 483-0888	http://www.hpsa.us/



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Resources for the development of the RHC Policy and Procedure Manual





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Resources to get Started

Purchase a P and P manual from Jim Estes. Price is \$159. Add Tools for \$79.



**RHC POLICY & PROCEEDURE
MANUAL**



<http://ruralhealthclinicconsultant.com/index.php/store#!/RHC-Policy-Manual/p/49692811/category=0>



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Resources to get Started

Purchase an online HIPAA P and P manual from HIPAATrek. Price is \$15 per employee Per month. Will be adding RHC P & P as well.

Sarah Badahman,
Chief HIPAAsherpa



HIPAAAtrek

<http://hipaatrek.com/>





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What you should have to start your RHC Manual.

Resources you will need to get Started

RHC Fact Sheet – August, 2014 is most current.

CFR Regulations

Appendix G – Interpretative Guidelines

CMS – Survey Form – CMS30

Deeming Authority Standards –

AAAASF

The Compliance Team



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CMS 30 Survey Form – Last updated March 1, 1978

Changes over the last 40 years

NP/PA is now 50% not 60% - OBRA 89

Lab tests are now 6 instead of 9 – mid-90s

Medical Director not on site every two weeks – 7/1/2014

Guidance from the deeming organizations on emergency meds.

RHCs can now pay using 1099 for some NPs/Pas – 7/11/2014

Updated Version. Not official:

<http://www.healthandwelfare.idaho.gov/Portals/0/Health/Rural%20Health/survey-report-tool.pdf>

Problem: Surveyors still cite this report.



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What is a rural health clinic?

<http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/downloads/RuralHlthClinfactsht.pdf>

Updated in August, 2014

FACT SHEET



Rural Health Clinic



THE RURAL HEALTH CLINIC Services Act of 1977 (Public Law 95-210) was enacted to address an inadequate supply of physicians serving Medicare beneficiaries and Medicaid recipients in rural areas and to increase the utilization of non-physician practitioners such as nurse practitioners (NP) and physician assistants (PA) in rural areas. There are approximately 3,800 Rural Health Clinics (RHC) nationwide that provide access to primary care services in rural areas.

Rural Health Clinic 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 that are furnished by and incident to services of a RHC provider; and
- Visiting nurse services to the homebound in an area where the Centers for Medicare & Medicaid Services (CMS) has certified that there is a shortage of Home Health Agencies.



one of the following types of Federally designated or certified shortage areas:

- Primary Care Geographic Health Professional Shortage Area (HPSA) under Section 332(a)(1)(A) of the Public Health Service (PHS) Act;
- Primary Care Population-Group HPSA under Section 332(a)(1)(B) of the PHS Act;
- Medically Underserved Area under Section 330(b)(3) of the PHS Act; or
- Governor-designated and Secretary-certified shortage area under Section 6213(c) of the Omnibus Budget Reconciliation Act of 1989.

Medicare Certification as a Rural Health Clinic

To qualify as a RHC, a clinic must be located in:

- A non-urbanized area, as defined by the U.S. Census Bureau; and
- An area currently designated by the Health Resources and Services Administration as



RURAL HEALTH CLINIC FACT SHEET





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Description

Web Address

RHC Regulations from the CFR

<http://narhc.org/resources/rhc-rules-and-guidelines/>

**Appendix G
Guidance to Surveyors:
Rural Health Clinics**

https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_g_rhc.pdf

**CMS-30 Survey For
Rural Health Clinics
(This is a modified
version that is useful)**

<http://www.healthandwelfare.idaho.gov/Portals/0/Health/Rural%20Health/survey-report-tool.pdf>



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Resources for RHCs

<u>Type</u>	<u>Cap</u>
CMS Rural Health Clinics Center (Google rural health clinic.asp)	http://www.cms.gov/Center/Provider-Type/Rural-Health-Clinics-Center.html
Rural Assistance Center	http://www.raconline.org/topics/rural-health-clinics
National Association of Rural Health Clinics	http://narhc.org/



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Deeming Authorities

<u>Type</u>	<u>Cap</u>
Quad A RHC Accreditation	<u>AAAASF/RHC Division</u>
The Compliance Team	<u>www.TheComplianceTeam.org</u>

Top RHC Deficiencies and Survey Findings

February 18, 2015

- [Slides - AAAASF](#) (PDF - 48 KB)
- [Slides - The Compliance Team](#) (PDF - 670 KB)
- [Audio](#) (MP3 - 14 MB)
- [Transcript](#) (PDF - 130 KB)

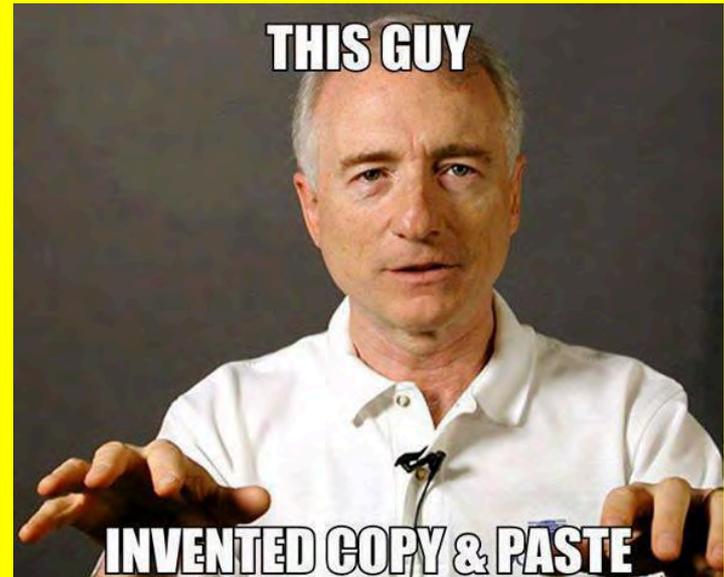


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What Not to Do?

Copy and Paste a Policy and Procedure Manual and not review it. Make sure it reflects what you are actually doing. Make sure you can do what it says you are going to do. Your policy is what you will be judged on if it is more stringent than required.



Larry Tesler



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What To Do

Be very specific on who will be doing what, how they will do it and when they will do it. Name the person who will be doing what when.



Birds do it, bees do it, Even educated fleas do it.
Let's do it, let's fall in love.

(Cole Porter)



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What should the Policies address?

Specifically address the 8 conditions of Participation in the P & P.





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What should you be concerned about?

There are two types of deficiencies

- 1. Standard**
- 2. Condition Level**

Condition level deficiencies require an additional inspection and delay you becoming a RHC or will terminate you from the program.



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Summary of RHC Regulations

#	CFR	Condition	Summary
1.	491.4	Comply with Fed, State, & Local Laws	NP/PA Scope of P.
2.	491.5	Must meet location requirements	Rural, Underserved
3.	491.6	Physical Plant and Environment	Safe, Maintained
4.	491.7	Organizational Structure	Medical Director
5.	491.8	Staffing and Staff Responsibilities	50% NP/PA
6.	491.9	Provision of Services	51% Primary Care
7.	491.10	Patient Health Records	HIPAA, SOAP, etc.
8.	491.11	Program Evaluation	Annual, Community Rep., P & P update



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Important Items to address

- 1. Provide updated Job Descriptions**
- 2. Name and List the duties of the Medical Director – Review 10 Charts per Quarter Minimum per NP/PA**
- 3. Provide information on Compliance with State Scope of practice for NP/PA**
- 4. List Owners and Addresses**
- 5. Updated Organization Chart**



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Idaho's Nurse Practitioner Supervision Laws

Nurse practitioners in Idaho are among those privileged to practice without physician supervision. In 2004, Governor Dick Kempthorne signed a law eliminating the physician supervision requirement for NPs in Idaho. No collaborative practice agreement or other formal supervision arrangement is required.



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Idaho's Nurse Practitioner Supervision Laws

Nurse practitioners in Idaho are required to submit a [biennial peer review](#) to the Idaho Board of Nursing. The peer review process is loose and not strictly outlined in Idaho State law. The NP may be reviewed by another nurse practitioner, a physician assistant or a physician. The peer review process is not a supervision guideline but is designed to show that while practicing independently, NPs are not practicing in isolation and participate with other providers in patient care.



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Idaho's Physician Assistant Supervision Laws

Physician Assistants and Graduate Physician Assistants are regulated in Idaho and must be licensed. Supervising physicians must also be registered with the Board.

<http://adminrules.idaho.gov/rules/current/22/0103.pdf>



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Forms should be approved and master copies maintained

1. Chart Audit Form for Quarterly chart reviews
2. Temperature Logs for Refrigerators.
3. Preventive Maintenance Logs of equipment and due dates for annual calibration.
4. Document monthly sample closet review for expired drugs and emergency kit.
5. Document facility preventive maintenance as scheduled (daily, weekly, monthly, quarterly, annual)

MEDICAL RECORD REVIEW CHECKLIST

MO

YR:

CLINIC NAME _____

PROVIDER NAME _____

REQUIRED ELEMENT	PRESENT IN RECORD			POSSIBLE POINT VALUE	ACTUAL POINT VALUE	RESPONSIBLE AREA	ACTUAL POINTS		
	YES	N/A	NO				BY RESPONSIBLE AREA		
							BUS OFF	NRSNG	MD, APN
1. Patient information updated each visit. Documentation of phone number, address, and insurance verification.				0	0	BO	0		
2. Yearly patient consent sheet signed and appropriately maintained.				0	0	BO	0		
3. Completed patient summary sheet (for pts with 3 or more visits). Must include:									
Significant surgical procedures				0	0	MD, APN			0
Significant diagnoses and hospitalizations				0	0	MD, APN			0
Chronic problems				0	0	MD, APN, NSG		0	0
Drug allergies				0	0	MD, APN, NSG		0	0
Health maintenance/preventive screenings				0	0	MD, APN, NSG		0	0
Immunization status				0	0	MD, APN, NSG		0	0
4. Completed "Medication List" (for patients with 3 or more visits). Should include ALL "chronic" meds.				0	0	MD, APN			0
5. Growth summary sheets for patients under 18 years of age.				0	0	MD, APN			0
6. Lab results noted and acknowledged by physicians (or APN and MD).				0	0	MD, APN			0
7. Radiology results noted and acknowledged by physicians (or APN and MD).				0	0	MD, APN			0
8. Pain assessed and recorded with each visit utilizing the pain scale.				0	0	MD, APN, NSG		0	0
9. Interdisciplinary screenings completed/documented.				0	0	MD, APN, NSG		0	0
10. Patient education documented.				0	0	MD, APN, NSG		0	0
11. Patient disposition completed/documented.				0	0	MD, APN, NSG		0	0
12. Fall assessment completed.				0	0	MD, APN, NSG		0	0
TOTALS	0	0	0	0	0	TOTALS	0	0	0

PERFORMANCE CALCULATIONS

TOTAL AS A CLINIC

BUSINESS OFFICE

NURSING SERVICE

MD/APN

#DIV/0!

#DIV/0!

#DIV/0!

#DIV/0!



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RHC Forms to use from Idaho

Description	Link
Idaho Bureau of Rural Health & Primary Care (See 2012 Presentations)	http://www.healthandwelfare.idaho.gov/Health/RuralHealthandPrimaryCare/RuralHealthClinic(RHC)Certification/tabid/408/Default.aspx
Medical Record Review Form	http://www.healthandwelfare.idaho.gov/Portals/0/Health/Rural%20Health/PatientRecordQualityCklist.pdf
CDC Temperature Logs	http://www.healthandwelfare.idaho.gov/Portals/0/Health/Rural%20Health/CDCTempLog.pdf
Equipment Maintenance Logs	http://www.healthandwelfare.idaho.gov/Portals/0/Health/Rural%20Health/Equipment%20Name.pdf
Sample Medication Log	http://www.healthandwelfare.idaho.gov/Portals/0/Health/Rural%20Health/SampleMedicationLog.pdf



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Ohio Presentations

Description	Link
Ohio RHC Documents	http://www.odh.ohio.gov/en/odhprograms/chss/pchr_programs/rural_health/sorh.aspx
Policies and Procedures Presentation	http://www.odh.ohio.gov/~media/ODH/ASSETS/Files/chss/state%20office%20of%20rural%20health/RHC%20Webinar%20Series/Slides%20-%20Policies%20and%20Procedures%20Webinar%20May%2028.pdf
RHC Regulations Presentation	http://www.odh.ohio.gov/~media/ODH/ASSETS/Files/chss/state%20office%20of%20rural%20health/RHC%20Webinar%20Series/RHC%20Services%20and%20Regulations%20Slides%20March%202014.pdf
Annual Evaluation Presentation	http://www.odh.ohio.gov/~media/ODH/ASSETS/Files/chss/state%20office%20of%20rural%20health/RHC%20Webinar%20Series/Slides%20-%20RHC%20Program%20Evaluation%20Feb%2018%202014.pdf



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Who is required to review and sign the RHC Policy and Procedure Manual? your RHC Manual.

Medical Director

Nurse Practitioner/Physician Assistants/CNM

Community Member

Optional – Office Manager

Optional – Hospital CEO

Optional – RHC Consultant



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How often is the RHC P and P updated?

Annually is the requirement.

**Must be signed by the Professional
Advisory Committee. (PAC)**

Recommend changes and implement.





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Who must review the policies initially and annually?

- 1. Medical Director**
- 2. Nurse Practitioner/PA/Certified Nurse Midwife**
- 3. Community Representative**





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RHC Policy and Procedure Manual may need to address Civil Rights Policies

- 1. If Provider-based - Yes**
- 2. If Independent – Depends on the State**
- 3. Here is a link to help you comply:**

<http://www.hhs.gov/ocr/civilrights/clearance/index.html>



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Civil Rights Technical Assistance

Meeting the RHC Civil Rights Requirement

November 20, 2012

- [Audio](#) (MP3 - 15.8 KB)
- [Transcript](#) (PDF - 116 KB)
- [Slides](#) _
- [Documents for a Non-Corporate Entity](#) _
- [Documents for a Corporate Entity](#) _



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Have a plan for when the Inspector comes to your clinic

- 1. Provide the receptionist with instructions**
- 2. Do not keep them waiting in the lobby**
- 3. Give them a desk to work at that is quiet and away from activity.**
- 4. Give them the P and P manual and Inspection Emergency kit.**
- 5. Inform the staff that the inspection is underway.**



Provide Donuts!!!



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**Have an Inspection Emergency Kit
up to date at all times. (a file with copies for the inspector)**

**The Inspector will hand you a list of what they
want to see in most cases. The list will typically
have the same things listed:**

- A. Physician/NP/PA/CNM/Nurses licenses**
- B. Schedules for NPs/PA/CNMs (50%)**
- C. Preventive maintenance logs and plans**
- D. ALS or CPR updated certificates**
- E. Chart Reviews by the Medical Director**
- F. Emergency, Fire, and Medical Drills**
- G. Fire Department inspection, Invoices for PM.....**



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Let's look at the RHC P and P manual

- 1. Add policy for Incident to. Page 80.**
- 2. Change policy for Emergency kit. (Page 103)**
- 3. Consent to Treat Policy 720**





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Review sections of the Policy and Procedure Manual at the Monthly/Quarterly Office meeting





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Questions, Comments, Thank You



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