



Rural Health Clinic Basics

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Learning Goals

At the conclusion of this training you will be able to:

- Discuss what a Rural Health Clinic (RHC) is.
- Discuss the RHC Federal Regulations.

This training is designed to provide an overview of the RHC program and a brief orientation to the RHC Federal Regulations.



What is a Rural Health Clinic?

- A Rural Health Clinic (RHC) is a healthcare facility located within a rural area federally
 - designated as a Health Professional Shortage Area (HPSA) or
 - a Medically Underserved Area (MUA) and
- Is neither a rehabilitation agency nor a facility primarily for the care and treatment of mental diseases.
- An RHC must provide primary health care, including laboratory services to its patients.

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The primary function of a Rural Health Clinic is to provide health care services to people living in rural areas.



What is a Rural Health Clinic?

- In Idaho, RHCs are governed by federal certification regulations.
- Applicable federal certification requirements are found in the State Operations Manual (SOM), [Chapter 2](#), and § 2240, [Appendix G](#)
- Idaho has no state licensure requirements for RHCs

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Location, service and other clinic requirements must be achieved and maintained in order to participate in the RHC program. All Federal regulatory requirements governing RHCs are found at 42 CFR (Code of Federal Regulations) 491, Subpart A. This section can be located on the internet at: http://www.access.gpo.gov/nara/cfr/waisidx_07/42cfr491_07.html


Appendix G, of the State Operations manual, is based on the CFR and provides additional guidance related to the regulatory requirements. Additional guidance is also found in the regulation sets which populate the national computer system data base (known as ASPEN). Ideally, Appendix G and the regulations in ASPEN are identical. However, with changes in additional guidance and regulations this is not always the case. Please ensure that you are reading the CMS updates in order to ensure you have the most current information available. These and additional information specific to RHCs can be found in the Rural Health Clinics Center of the Centers for Medicare & Medicaid Services (CMS) website at

<https://www.cms.gov/center/rural.asp>

Currently, the ASPEN regulation set contains the most up to date comprehensive information available and therefore, that is the regulation set

available on our website at:

<http://www.healthandwelfare.idaho.gov/LinkClick.aspx?fileticket=3KNq01EhWck%3d&tabid=277&mid=3140>



RHC Federal Regulations

- Conditions for Coverage
 - Standards
 - Elements

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If you could please locate the RHC regulations, we can discuss what all is included in the regulation set. Again, the regulations can be accessed at:
<http://www.healthandwelfare.idaho.gov/LinkClick.aspx?fileticket=3KNq01EhWck%3d&tabid=277&mid=3140>

The RHC regulation set contains Conditions for Coverage (CfC), Standards, and Elements. Conditions represent the overall systems of the RHC, and must be in compliance with at all times. Under each Condition are Standard level regulations associated with that Condition and under the standard level requirements are the elements of that standard.

Looking at the regulation set, you can see the J-tag number (e.g., J-0076). Under that is the title of the specific regulation, the CFR number and the type (Condition, standard or element). Under that information, in the left hand column is the actual regulatory language. In the right hand column are the regulation's interpretive guidelines. The purpose of the guidelines, procedures and probes are to clarify the information that is relevant to specific regulatory requirements. While the guidelines, procedures and probes provide assistive information, they do NOT replace professional judgment. Additionally, not all regulatory requirements will have interpretive guidance, for example J-0075.



RHC Conditions for Coverage

- **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**

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The RHC Federal Regulations include eight CfCs, which must be met in order to participate in the RHC program. Please follow along in your regulation set as the CfCs are reviewed.



CfC for Compliance with State Licensure Law (J-0003)

- Federal Laws and Regulations
- State and Local Laws
 - Licensure/Certification/Registration of Personnel

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The Federal Regulations governing RHCs are found at 42 CFR 491, Subpart A. It is incumbent on the facility to ensure compliance with other federal requirements, such as OSHA standards and requirements addressed under HIPAA.

The Idaho Department of Health and Welfare does not have state licensure rules for RHCs. Therefore, the standard at J-0004 does not apply. However, state requirements related to Licensure/Certification/Registration of Personnel at J-0005 do apply. The facility must ensure adherence to Licensure Rules and Practice Acts in order to maintain compliance with this Federal Regulation.



CfC for Location of Clinic (J-0006)

- A Rural Health Clinic (RHC) is a healthcare facility located in a rural area federally designated as a Health Professional Shortage Area (HPSA) or a Medically Underserved Area (MUA)

RHCs are located in a rural area, federally designated as a HPSA or MUA. Additional specific location information can be found in the standard and element requirements at J-0007 through J-0018.



CfC for Physical Plant and Environment (J-0019)

- Physical Plant Safety
- Preventive Maintenance
- Non-medical Emergencies

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This CfC is split into three main parts: Physical Plant Safety (standard J-0020), Preventive Maintenance (standards and elements J-0021 through J-0024) and non-medical emergencies procedures or disaster preparedness (standards and elements J-0025 through J-0028). The Physical Plant Safety standard addresses basic construction and space, Preventive Maintenance addresses clinic systems to ensure equipment is maintained, drugs are stored appropriately and that the clinics is clean and orderly. The Emergency Procedures regulations address the manner in which the clinic keeps patients safe during non-medical emergencies.



CfCs: Organizational Structure & Staffing (J-0029)

- Organizational Structure: Physician Direction, Policies, Disclosure & Staffing
- Staffing: Time requirements, responsibilities, current licensure/certification

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The CfC for Organization addresses Physician Direction, policies, disclosure of ownership, and staffing.

It should be noted that the requirement of 60% time coverage, at regulation J-0041, is in error and conflicts with the 50% requirements specified in other regulations. The percentage discrepancy has been clarified with CMS, Region X staff and is 50% as specified throughout the other regulations in Appendix G.

There is additional guidance, via an S&C letter regarding “Hours of Operation for Rural Health Clinics (RHC)”, dated December 7, 2006 (Reference number S&C-07-06), which addresses patients being at the clinic during non-operating hours either to get out of bad weather or for administrative matters. In accordance with that CMS guidance, allowing for this does not impact compliance with J-0041. Also, please note J-0041 relates to 42 CFR 491.8(a)(6). However, the CMS S&C letter refers to CFR 493.2, which does not address RHCs. So again, the CFR numbers have changed. When in doubt, please refer directly to the current CFR. A copy of the CMS S&C letter is available on the CMS web site.



CfC: Provisions of Services (J-0052)


- Policy & Procedure
- RHC Services:
 - Diagnostic and Therapeutic Services
 - Lab Services
 - Emergency Services
- Services Provided by Arrangement or Agreement

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The CfC for Provisions of Services includes policies and procedures related to the scope of services offered by the RHC. Basic requirements and patient care policies are addressed in standard and elements J-0053 through J-0058. Direct services, including general, laboratory and emergency services are addressed in standards and elements J-0059 through J-0062 and services provided by arrangement or agreement are addressed in standards and elements J-0063 through J-0065.



CfC: Patient Records (J-0066)

- Policy
- Maintenance of Records
- Documentation

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This CfC addresses policy, maintenance, and documentation of records. The standards and elements J-0067 through J-0070 address the overall facility systems for record keeping. Protection of patient information is addressed in standards and elements J-0071 through J-0074 and retention of records is addressed at standard J-0076. Please be aware that there are additional requirements addressed under the federal Health Information Portability and Accountability Act (HIPAA).



CfC: Program Review (J-0076)

- Annual Evaluation
 - Services: Utilization review
 - Clinical Records: Active and Closed
 - Policies

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Includes annual review of all services, clinical records, and policies. The standards and elements J-0077 through J-0081 address the minimum requirements of the annual review, while the standards and elements J-0082 through J-0085 address the purpose of the evaluation. The standard at J-0086 addresses the evaluation findings and the action taken by the clinic based on those findings.



Achieving and Maintaining Compliance

- Ensure staff are familiar with Federal Regulations
- Develop systems to ensure compliance with Regulatory Requirements
- Monitor to ensure adherence to clinic practice standards

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It is the clinic's responsibility to achieve and maintain compliance with all Federal Regulatory requirements in order to participate in the RHC program. Ongoing assessment of systems, coupled with staff training and monitoring, can be critical to ensuring regulatory requirements are met and patients are receiving quality healthcare.



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- ***Please send your comments or questions to fsb@dhw.idaho.gov***

Thank you for your time and participation. Please feel free to email any comments or questions you may have.