

# CMS requirements for RHC's



# Rural Health Presentation 2008

- How you can transform your Medicare survey into a relatively brief and painless experience
- Please ask questions

# Who am I ?

To stand and wonder  
to wait  
while the wheels  
of fate  
slowly grind  
my life away.

*Country Joe McDonald*  
1968



# John Pilmer RN

- Public Health Division
- Oregon Department of Human Services
- Health Care Licensure and Certification
- CMS representative
- 971-673-0540
- [john.g.pilmer@state.or.us](mailto:john.g.pilmer@state.or.us)

# CMS representative



# HELP



- Initial certification
- Ongoing compliance
- Continued certification

# Why is this important?

- Initial survey
- Recertification surveys
- Cooperative surveys
- Look behind surveys
- Federal surveys
- Complaint investigations
- Congressional oversight

# INITIAL APPLICATIONS

- Request packet in writing
- Current situation
- Application papers
  - ◆ CMS 29
  - ◆ 1561A (2 original copies)
  - ◆ 855A to fiscal intermediary



# Medicare is here !

- What to expect during a survey



# The List

- A short list of what the surveyor needs to document compliance with the Medicare regulations



**A tour of facility, including all rooms, drug storage areas, emergency drugs and equipment, exit signs, and the area where lab tests are performed.**

**The clinic's days and hours of operation.**

**The names and licenses of physicians, nurse practitioners or physician assistants, and all other licensed personnel.**

**The work schedule for the physician and midlevel practitioners. Is the physician present at least once every two weeks?**

**A copy of the preventive maintenance policy and documentation.**

**Documentation of training of staff in handling non-medical emergencies.**

**Policy books including documentation of how the policies are developed and reviewed.**

**Agreements for hospitalization, referrals, and specialized tests.**

**A list of lab tests performed by the clinic and a copy of CLIA Certificate or CLIA waiver.**

**System to maintain confidentiality of medical records.**

**Medical records will be selected randomly for review.**

**Documentation of chart review by the Physician and Mid level Practitioner.**

**A copy of the annual program evaluation and quality assurance data.**

**A copy of any recent inspections by Radiation Protection Services.**

**Licenses for diagnostic imaging equipment and personnel.**

**An organizational chart clearly setting forth the lines of authority and responsibilities.**

# The Notebook

- Put all of your required documentation in a notebook
- Label it clearly
- Make sure everyone knows where it is
- Update it periodically
- If it is not documented it is not done

# What are the regulations?

---

11 Pages

11 Conditions

Brief summary

Conditions for Participation

491.1 Purpose and scope

491.2 Definition of a  
shortage area

491.3 RHC procedures

# 491.4 Compliance with Federal, State and Local Laws

- State License
- Other local laws
- Licensure, certification or registration of personnel



# 491.5 Location of clinic

- Grandfather clause
- Initial



©Silverander, EthnoGraphics®

# 491.6 Physical plant and equipment

- Maintenance. The clinic has a preventive maintenance program to ensure that:
- All essential mechanical, electrical and patient care equipment is maintained in safe operating condition

# Maintenance program

- Follow manufacturers recommendations
- Surface integrity (Damaged exam tables etc.)
- Maintain documentation that you are monitoring equipment
- Radiation Protection Services

# Drugs and biologicals are appropriately stored

- Expired items
- Temperature monitoring
- Potential infection control issues

# The premises are clean and orderly



# Emergency procedures

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

# Training staff in handling emergencies

- Fire drills



# Exit signs

- Must be illuminated
- Not glow in the dark
- Can be luminescent





# Other measures

- Consistent with the particular conditions of the area in which the clinic is located



# 491.7 Organizational structure

- Organizational chart
- Job descriptions
- Policies
- Sufficient staff
- MD, NP, PA present at all times

# 491.8 Staffing and staff responsibilities

- Medical Director
- Mid-level practitioner

# Physician

- Provides medical direction
- Consultation
- Medical supervision

# Physician

- Provides medical orders
- Provides medical care services to the patients of the clinic
- Group activities

# Physician

- Sufficient time
- At least once every 2 weeks
- Extraordinary circumstances documented



# Mid level practitioner

- Provides services in accordance with clinic policies
- Arranges for needed services that cannot be provided at the clinic
- Assures adequate patient health records are maintained
- Group activities

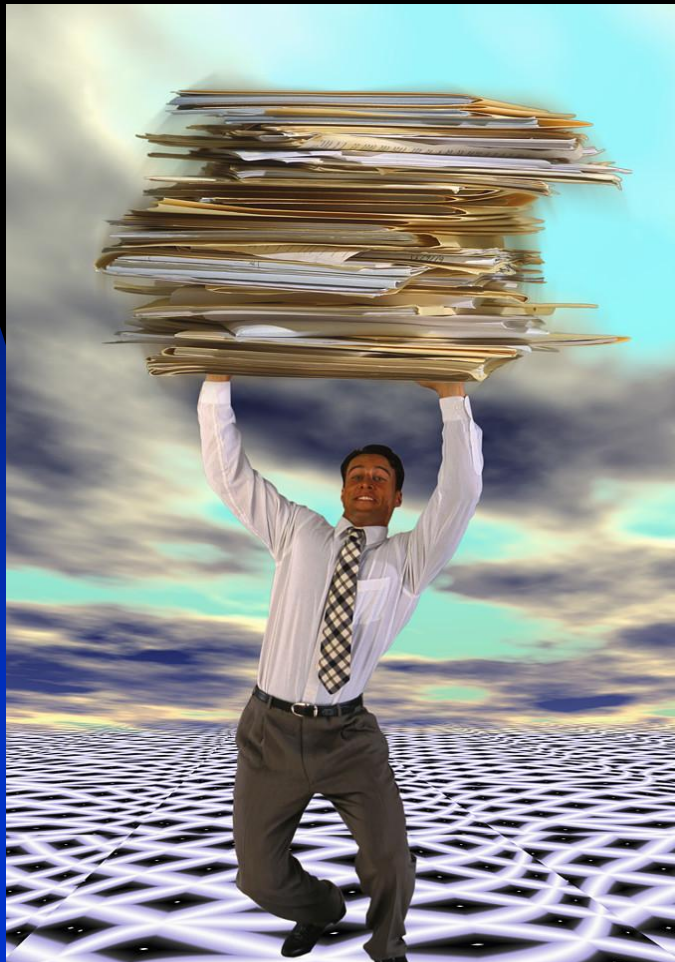
# Mid level practitioner

- Available to provide services at least 50% of the time the RHC operates
- Waiver





# MD and Mid-level



- Participate in a periodic review of patients' health records
- Maintain documentation

# Group activities

- Group of professional personnel
- Physician, mid-level practitioner and a person who is not a member of clinic staff
- Develop and review as necessary (at least annually) the clinic policies
- Maintain documentation

# 491.1 Provision of services

- Primarily engaged in providing outpatient health services
- Primary care

# Policies

- Description of services offered by the clinic
- Guidelines for management of health problems
- Maintenance of health care records
- Procedures for periodic review and evaluation of the services furnished by the clinic
- Rules for storage and administration of drugs

# Direct services

- Diagnostic and therapeutic services commonly furnished in a physicians office
- Medical history, physical exam, assessment, and treatment for a variety of medical conditions

# Laboratory

- Minimum requirements
- CLIA certificate of waiver
- 6 required tests
- Must be provided as a direct services

# Required tests

- Chemical exam of urine by stick or tablet including ketones
- Hemoglobin or hematocrit
- Blood glucose
- Stool for occult blood
- Pregnancy tests
- Primary culturing for transmittal

# Emergency

- Provides emergency procedures as a first response to common life threatening injuries
- Has available drugs and biologicals commonly used in life saving procedures such as analgesics, local anesthetics, antibiotics, anticonvulsants, antidotes and emetics, serums and toxoids.



# Services provided through agreements or arrangements

- Hospital care
- Specialized diagnostic or laboratory services
- Evidence of referral



# 491.10 Patient health records

- Consent forms
- Medical history
- Assessment
- Summary of episode
- Disposition and instructions
- Orders, reports of treatments and medications
- Signatures

# Medical record security

- Maintains confidentiality of record information and provides safeguards against loss, destruction or unauthorized use



# 491.11 Program evaluation/QAPI

- Confusion
- Can do either
- Condition
- Please do something

# Common elements

- Evaluate organizational processes, functions, and services
- Utilization of clinic services, including at least the number of patients served and the volume of services
- Effective in identifying issues and implementing improvements
- Maintain documentation

# Differences

- QAPI
- Ongoing
- Specific projects
- Data driven
- Performance measures
- Priority driven
- Program evaluation
- Annual
- Program review

