

Regulatory and Legislative Updates

Sarah Hohman, MPH, CRHCP

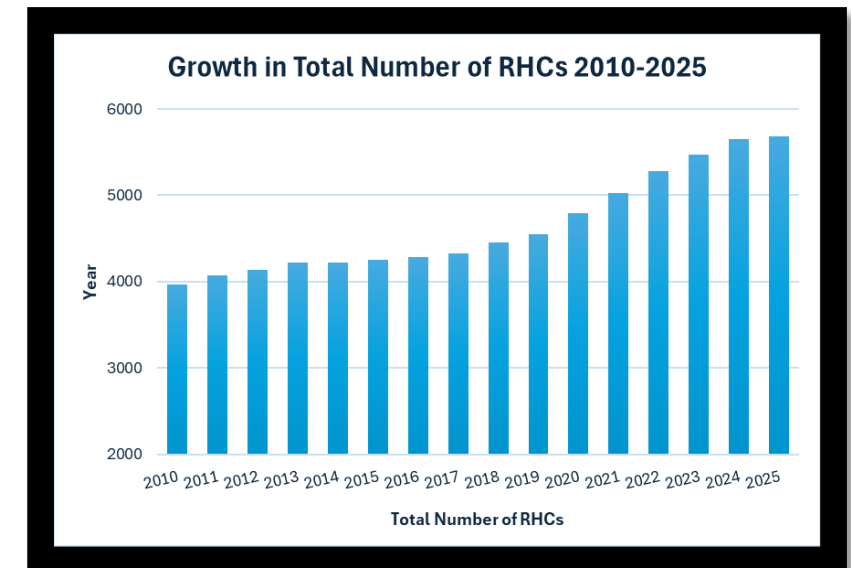
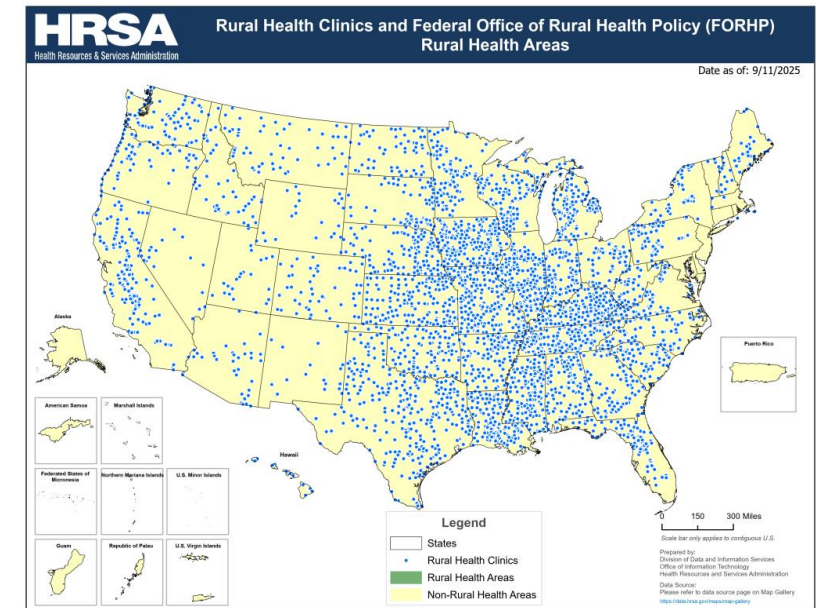
Director of Government Affairs

National Association of Rural Health Clinics

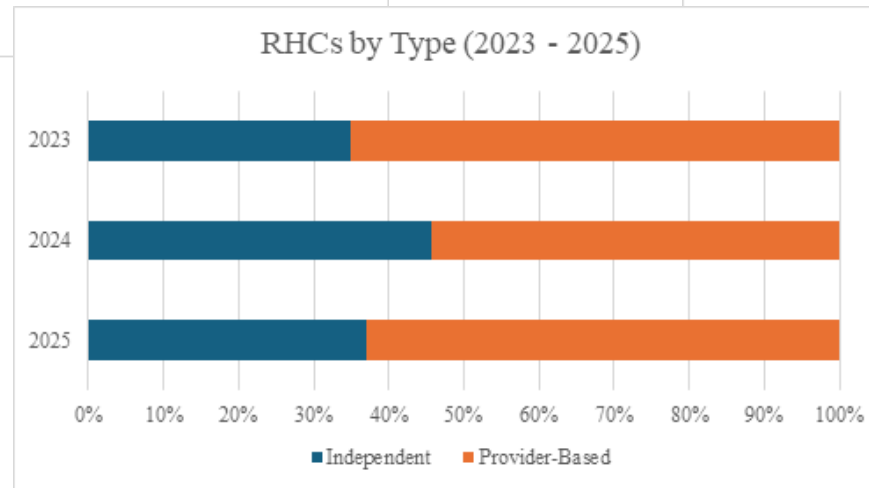
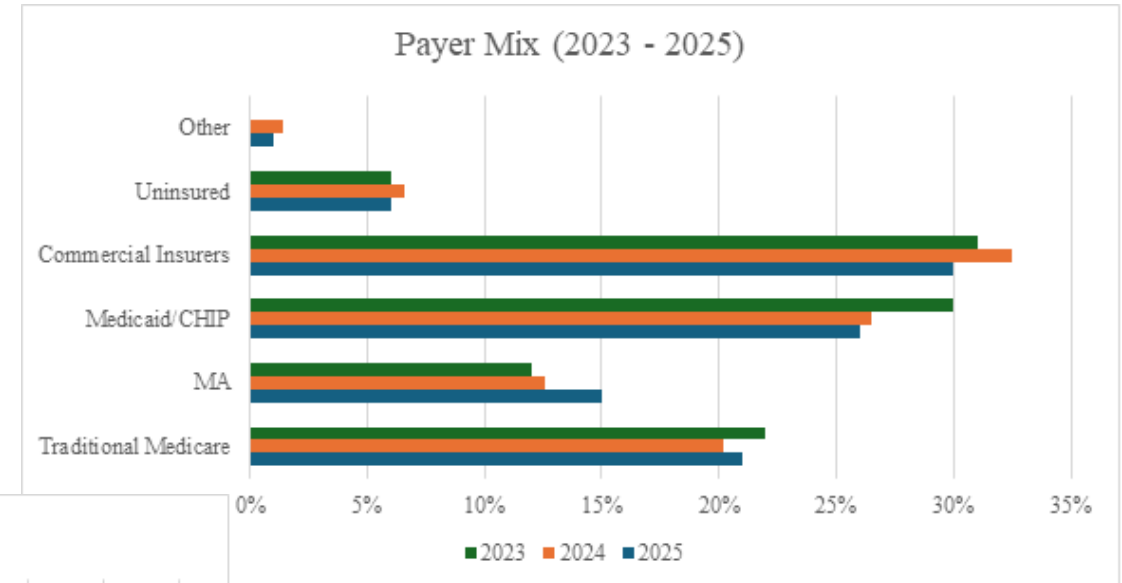
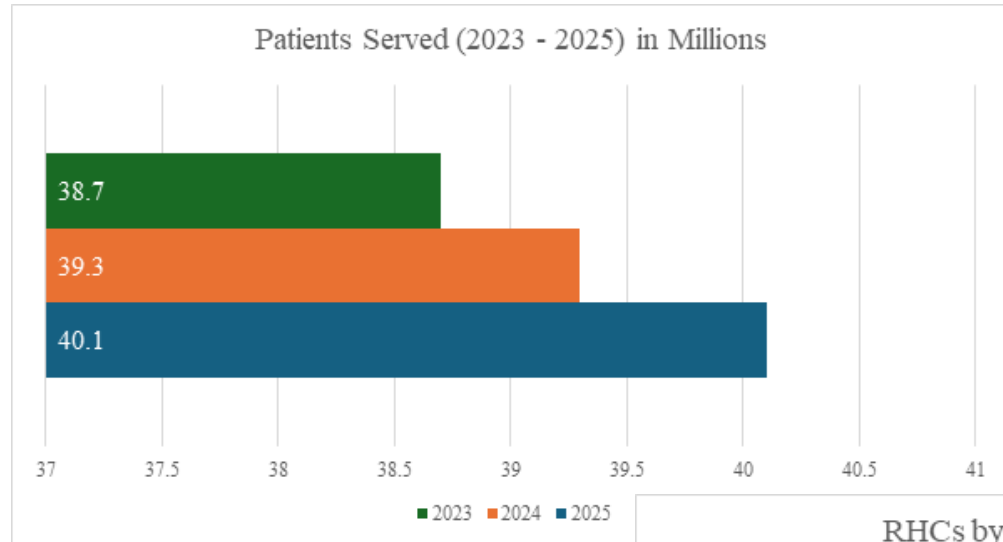


Status of the RHC Program

- There are over 5,800 RHCs across 45 states and one territory
 - **102 in Oregon!**
- RHCs provide care to over 40 million Americans annually
- Many RHCs have closed, many more have opened
 - NARHC encourages you to share these openings and closures with us



Annual NARHC Policy Survey Results



Annual Policy Survey Results

RANKED CONCERNS (2026)	
1	Medicare Advantage Reimbursement
2	Medicare Advantage Other: Prior Authorization, Claims Denials, Other Administrative Burdens
3	Medicaid Reimbursement
4	Provider Recruitment / Retention
5	Medicare Cap/Upper Payment Limit Concerns
6	Compliance with New Regulations - Section 1557 Nondiscrimination
7	Compliance with New Regulations - Good Faith Estimate
8	Provider Enrollment
9	Cybersecurity

RHCs ranked Medicare Advantage reimbursement and Medicare Advantage administrative burdens as the top 2 most concerning issues

CMS Announces Plans for RHC Self-Attestation Process

- CMS plans to implement a program through which RHCs would be required to complete a brief, self-attestation form every 6 years, in lieu of periodic on-site surveys
- NARHC staff have sent comments to CMS
 - We acknowledge the intent of CMS to reduce administrative burdens placed on RHCs
 - Recommend focusing on fixing the underlying regulations and policies causing the administrative burdens in the first place instead of changing the method in which RHCs demonstrate program compliance
 - Currently awaiting more information (effective date, etc.)



CY2027 Medicare Physician Fee Schedule Proposed Rule

- Proposes Diabetes Self-Management Training (DSMT) and Medical Nutrition Therapy (MNT) as qualified preventive services that are covered and paid the AIR as stand-alone billable visits
- RPM / RTM services could not be billed when the services are performed by third-party companies/contractors
- Proposed rule also contains many Requests for Information, value-based care, artificial intelligence



AI Request for Information

- What tools are being used in primary care clinical settings?
- How has your practice been impacted by these tools?
- How do you ensure data and privacy are protected?
- Please share your [feedback](#) with NARHC for our comments



Policy Priority: Medicare Telehealth Coverage for RHCs

Medical Telehealth

- RHCs can serve as telehealth distant site providers through December 31, 2027
- Paid ~\$97 for all services on Medicare's allowable telehealth list (200+ codes)
- Bill as G2025, not encounters

Mental Health Telehealth

- Permanent coverage in RHCs, reimbursed at AIR, counts as an encounter
- Occasional in-person visit requirements waived until January 1, 2028

UPDATE: Effective October 1, 2026, RHCs shall bill the individual HCPCS codes describing the telehealth services furnished to Medicare beneficiaries, instead of G2025 for every service provided. Additionally, RHCs will be required to report modifier 93 for audio-only services, and modifier 95 for audio-visual telehealth.

Continued Monitoring of H.R.1 Implementation

- Increased frequency of eligibility checks (twice per year) begins January 1, 2027
- Work/community engagement requirements begin January 1, 2027
 - How is your state engaging providers, MCOs, beneficiaries at this stage?
 - Are your facilities engaging with patients on upcoming rules?

CBO estimates 10 million more uninsured by 2034

State level decisions will impact whether these estimates are accurate



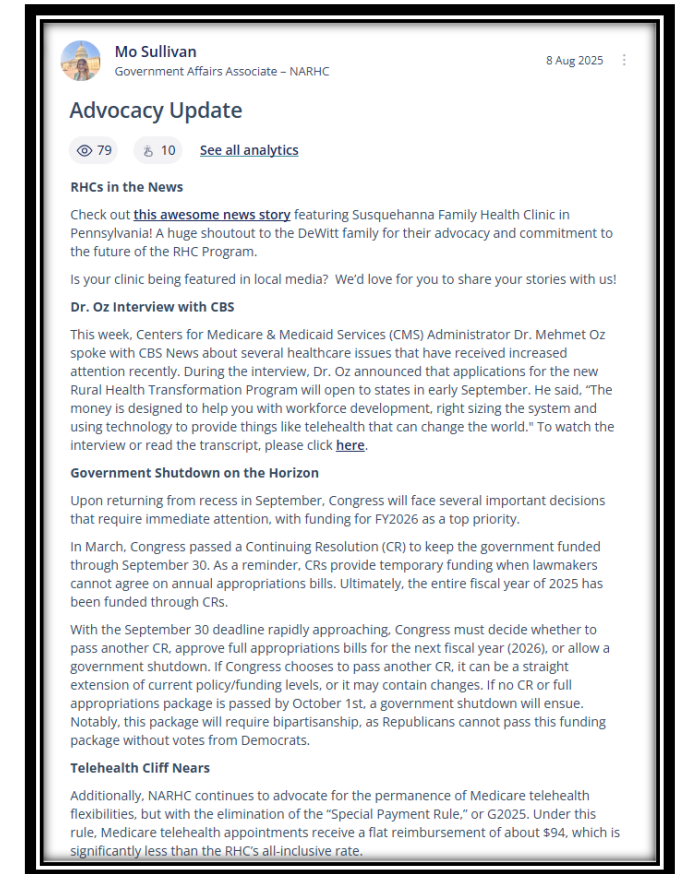
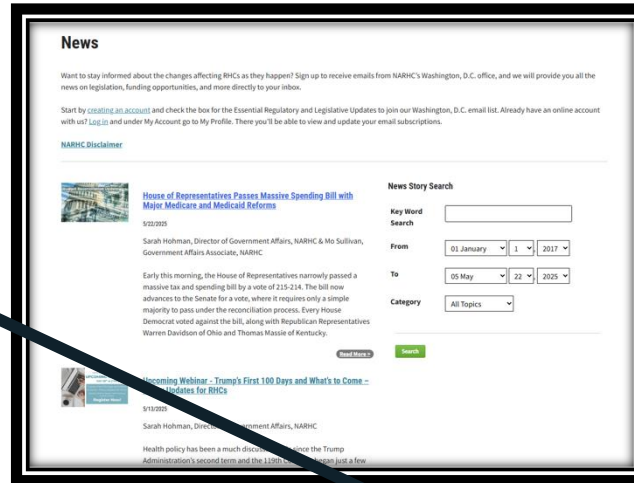
Other Things to Watch 119th Congress

- Increasing focus on affordability approaching midterm elections
 - Price Transparency
 - Hearings with hospitals, insurance companies
- Very limited opportunities/vehicles to move legislation



Stay “In the Know” on RHC Issues

- [NARHC.org](https://www.narhc.org)
 - Email Listserv
 - Discussion Forum
 - Weekly policy updates!
 - NARHC News
 - [Biweekly Office Hours](#)
 - Resources
 - TA Webinars
 - Policy and Advocacy
- [State rural health organizations & offices of rural health](#)
- [Federal Office of Rural Health Policy \(FORHP\) Weekly Updates](#)
- [RHIhub](#)
- [CMS RHC Center](#)





Sarah Hohman, MPH, CRHCP

Director of Government Affairs
National Association of Rural Health Clinics

866.306.1961

Sarah.Hohman@narhc.org

