



KNOWLEDGE • RESOURCES • TRAINING

Rural Health Clinic







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What's Changed?

 We pay Rural Health Clinics (RHCs) a bundled payment, or All-Inclusive Rate (AIR) per visit, for qualified primary care and preventive health services provided by an RHC practitioner (page 6)

- Added hospices as a location where RHC visits can take place (page 7)
- Beginning January 1, 2022, RHCs can bill Transitional Care Management (TCM) and general
 care management services furnished for the same patient during the same service period, if
 the RHC meets the requirements for billing each code (page 8)
- Beginning April 1, 2021, RHCs will receive a prescribed national statutory payment limit per visit increase over an 8-year period for each year from 2021 through 2028 (page 8)
- Added COVID-19 monoclonal antibody products as services Medicare covers (page 8)
- Beginning January 1, 2022, RHCs can report and get payment for mental health visits furnished via real-time telecommunication technology (page 9)
- Beginning January 1, 2022, RHCs are eligible to get payment for hospice attending physician services when provided by a RHC physician, nurse practitioner, or physician assistant who's employed or working under contract for an RHC, but isn't employed by a hospice program (page 10)

You'll find substantive content updates in dark red font.



A Rural Health Clinic (RHC) is a clinic located in a rural, underserved area with a shortage of primary care providers, personal health services, or both. Currently, there are about 4,500 RHCs nationwide providing primary care and preventive health services in underserved rural areas.

Together we can advance health equity and help eliminate health disparities in rural populations. Find these resources and more from the CMS Office of Minority Health:

- Rural Health
- Data Stratified by Geography (Rural/Urban)
- Health Equity Technical Assistance Program

RHC Practitioners

RHCs and their staff must comply with all licensure and certification laws and regulations. Medicare pays RHCs for qualified primary and preventive health services provided by RHC practitioners, including:

- Physicians
- Nurse Practitioners (NPs)
- Physician Assistants (PAs)
- Certified Nurse-Midwives (CNMs)
- Clinical Psychologists (CPs)
- Clinical Social Workers (CSWs)

RHC Patient Services

RHCs provide:

- Primary care and preventive services
- Services and supplies furnished incident to RHC practitioner services, such as taking blood pressure or administering shots
- Homebound visiting nurse services in CMS-certified home health agency shortages
- Some care management services
- Some <u>virtual communication services</u>, such as communications-based technology and remote evaluation services



RHC Certification

To be certified as an RHC, a clinic must meet all state and federal requirements, including location, staffing, and health care services requirements. RHCs must also have a quality assessment and program improvement program.

Location Requirements

An RHC must:

- Be located in an area defined by the U.S. Census Bureau as non-urbanized
- Be located in an area currently designated by the Health Resources and Services Administration (HRSA) within the last 4 years as 1 of these:
 - Primary Care Geographic Health Professional Shortage Area
 - Primary Care Population-Group Health Professional Shortage Area
 - Medically Underserved Area
 - Governor-designated and Secretary-certified Shortage Area

Staffing Requirements

An RHC must:

- Employ an NP or PA (RHCs may contract with NPs, PAs, CNMs, CPs, and CSWs when the RHC employs at least 1 NP or PA)
- Have an NP, PA, or CNM working at least 50% of the time during operational hours
- Post operation days and hours

Health Care Services Requirements

An RHC must:

- Directly provide routine diagnostic and lab services
- Have arrangements with 1 or more hospitals to provide medically necessary services unavailable at the RHC
- Have drugs and biologicals available to treat emergencies
- Provide these lab tests on site:
 - Stick or tablet chemical urine exam or both
 - Hemoglobin or hematocrit
 - Blood sugar
 - Occult blood stool specimens exam



- Pregnancy tests
- Primary culturing to send to a certified lab
- Not be primarily a mental disease treatment facility or a rehabilitation agency
- Not be a Federally Qualified Health Center (FQHC)

RHC Payments

We pay RHCs a bundled payment, or All-Inclusive Rate (AIR) per visit, for qualified primary care and preventive health services an RHC practitioner provides. We subject the AIR to a payment limit per visit, meaning an RHC won't get any payment beyond the specified limit amount per visit.

For independent RHCs, provider-based RHCs in a hospital with 50 or more beds, and RHCs enrolled in Medicare on or after January 1, 2021:

- Payment limit per visit based on these national statutory limits:
 - January 1, 2021–March 31, 2021 = \$87.52
 - April 1, 2021–December 31, 2021 = \$100.00
 - Calendar Year (CY) 2022 = \$113.00

For specified provider-based RHCs in a hospital with less than 50 beds:

 Medicare Administrative Contractors (MACs) calculate the payment limit per visit for providerbased RHCs that meet certain criteria

For certain preventive services like the Annual Wellness Visit (AWV) and the Initial Preventive Physical Exam (IPPE), we pay the full AIR and patients don't pay anything. For most other services, Medicare Part B deductible and coinsurance rates apply. This means that once patients meet their Part B deductible, we pay 80% of the AIR and the patient pays the remaining 20%.





RHC Visits

RHC visits must be:

- Medically necessary
- Medical or mental health visits, qualified preventive health visits, or face-to-face visits between the patient and an RHC practitioner
- A qualified RHC service needing an RHC practitioner

RHC visits can take place at:

- RHC
- Patient's home, including an assisted living facility
- Medicare-covered Part A skilled nursing facility
- Scene of an accident
- Hospice

RHC visits can't take place at:

- Inpatient or outpatient hospital department, including a critical access hospital
- Facility with specific requirements excluding RHC visits

Multiple Visits on the Same Day

Visits with more than 1 RHC practitioner on the same day, or multiple visits with the same RHC practitioner on the same day, count as a single visit, **except** when:

- Patient returns to the RHC for diagnosis or treatment of an injury or illness that happened after
 the initial visit; for example, a patient sees their practitioner in the morning because they have flu
 symptoms, then later in the day they cut their finger and return to the RHC
- Patient has a qualified medical and mental health visit on the same day
- Patient has an IPPE and a separate medical or mental health visit on the same day



RHC Services

Care Management Services

RHCs may provide general care management services, such as:

- Transitional Care Management (TCM)
 - Beginning January 1, 2022, RHCs can bill TCM and general care management services furnished for the same patient during the same service period, if the RHC meets the requirements for billing each code
- General Care Management (G0511)
 - Chronic Care Management (CCM)
 - General Behavioral Health Integration (BHI)
 - Principal Care Management (PCM)
- Psychiatric Collaborative Care Model (CoCM) (G0512)

We don't require the RHC face-to-face services requirement for care management services. Auxiliary personnel may provide them under general supervision.

RHCs can't bill care management services if another practitioner or facility billed them during the same time period.

Flu, Pneumococcal, & COVID-19 Shots & COVID-19 Monoclonal Antibody Products

We pay for flu, pneumococcal, COVID-19 shots, and COVID-19 monoclonal antibody products and their administration at 100% of reasonable cost. RHCs report these services on a separate cost report worksheet. RHCs shouldn't report these services on their RHC billing claims.

Note: We updated the RHC cost report to reflect costs related to COVID-19 shots and COVID-19 monoclonal antibody products and their administration.

An RHC can't bill a visit when the practitioner only sees a patient to administer a shot. Instead, the RHC includes shots and their administration on the annual cost report and we reimburse them at cost settlement. Patients pay no Part B deductible or coinsurance for these services.

Hepatitis B Shot Administration & Payment

The bundled payment, or AIR, for an RHC visit includes the hepatitis B shot and its administration costs. This means you can't bill the shot or its administration separately from the visit, and you can't bill for a visit if shot administration is the only service you provided. However, you can include it on a separate line item when you submit the visit's bill, which ensures the patient pays no deductible or coinsurance. If the shot was the only service you provided, you can add it on a separate line item for the next visit.



Telehealth Services Payment

RHCs can be an "originating site" for telehealth services. An originating site is the location where an eligible patient gets telehealth services. A patient must go to an originating site for services located in a county outside a Metropolitan Statistical Area or in a rural Health Professional Shortage Area in a rural census tract. RHCs serving as telehealth originating sites get an originating site facility fee. You may include the originating site facility fee charges on the claim.

RHCs aren't authorized to serve as a "distant sites," except during the COVID-19 Public Health Emergency (PHE) (see COVID-19 Flexibilities). A distant site is where the practitioner is located during the telehealth service. You can't bill the visit's cost or include it on the cost report.

This means patients can go to the RHC to get telehealth services provided by practitioners located in other areas of the state or country, but practitioners in the RHC can't provide telehealth services, except during the COVID-19 PHE.

Mental Health Visits Furnished Using Telehealth

Beginning January 1, 2022, RHCs can report and get payment for mental health visits furnished via real-time telecommunication technology in the same way they currently do when visits take place in-person, including audio-only visits when the patient isn't capable of, or doesn't consent to, using video technology.

An in-person, non-telehealth visit must be furnished at least every 12 months for these services; however, we may make exceptions to the in-person visit requirement based on patient circumstances (with the reason documented in the patient's medical record) and also allow more frequent visits as driven by clinical needs on a case-by-case basis.

Virtual Communication Services (G0071)

We pay for virtual communication services when an RHC practitioner meets certain requirements, including:

- Practitioner provides at least 5 minutes of billable RHC communication technology-based or remote evaluation service
- Patient had at least 1 face-to-face billable visit within previous year
- Virtual visit isn't related to service provided within last 7 days
- Virtual visit doesn't lead to in-person RHC service within the next 24 hours or at next appointment

When an RHC practitioner provides a patient with virtual communication service, we don't require the RHC face-to-face requirements and apply the coinsurance and deductible.

Virtual Communication Services FAQs has more information.



Hospice Attending Physician Services Payment

Beginning January 1, 2022, RHCs and FQHCs will be eligible to get payment for hospice attending physician services when provided by an RHC physician, NP, or PA who's employed or working under contract for an RHC, but isn't employed by a hospice program. During a hospice election, attending physician services can take place at the patient's home, a Medicare-certified hospice freestanding facility, skilled nursing facility, or hospital.

COVID-19 Flexibilities

MLN Matters® Article SE20016 has more information on new and expanded COVID-19 RHC flexibilities during the PHE.

Cost Reports

RHCs must file an annual cost report. Use <u>Form CMS-222-17</u> to determine your payment rate and reconcile interim payments. Include graduate medical education adjustments, bad debt, shots, and their administration payments.

- Independent RHCs must complete <u>Health Clinic Form (CMS-222-1992)</u>, Independent Rural Health Clinic and Freestanding Federally Qualified Health Center (HCLINIC) Cost Report
- Hospital-based RHCs must complete <u>Hospital Form (CMS-2552-2010)</u>, Worksheet M, Hospital and Hospital Health Care Complex Cost Report
- Provider-based RHCs must complete the appropriate worksheet for RHC services within the parent provider's cost report

Provider Reimbursement Manual – Part 2 has more cost reports and forms.

Annual Reconciliation

At the end of the annual cost reporting period, RHCs submit a report to their MACs. The report includes total allowable costs, total RHC service visits, and other required reporting period information. After reviewing the report, MACs determine a final period rate by dividing allowable costs by the number of actual visits.

MACs determine the total payment due and the amount necessary to reconcile payments made during the period with the total payment due. They review interim and final payment rates for productivity, reasonableness, and payment limitations.

For more information, find your MAC's website.



Resources

 Learn about covered services, visits, payment policies, and other information in Medicare Benefit Policy Manual, Chapter 13

- Learn how we process RHC claims in Medicare Claims Processing Manual, Chapter 9
- Learn how we evaluate state survey and certification efforts in State Operations Manual, Chapter 8
- Learn about RHC certification requirements in Medicare State Operations Manual, Chapter 2, Appendix G
- Learn about being certified as a Medicare RHC supplier by reviewing <u>applicable laws</u>, regulations, and compliance information
- Learn how RHC providers did on performance surveys by searching <u>Survey and Certification's</u> Quality, Certification and Oversight Reports (QCOR)
- Find more information about billing care management services in the <u>Care Management Services</u> in RHCs and FQHCs FAQs

Other Helpful Websites

- American Hospital Association Rural Health Services
- CMS's Rural Health Strategy
- Medicare Rural Health Clinics
- National Association of Rural Health Clinics
- National Rural Health Association
- Rural Health Information Hub

Regional Office Rural Health Coordinators

Get contact information for <u>CMS Regional Office Rural Health Coordinators</u> who offer technical, policy, and operational help on rural health issues.

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