



HBS

Update

September 21, 2017

RHC Information Exchange Group

[RHC Information Exchange Group on Facebook](#)

"A place to share and find information on RHCs."

TABLE OF CONTENTS

DESCRIPTION	PAGE
Update on Palmetto Replacing Cahaba as the MAC	2
CMS issues RHC Basic Training Course	3
Emergency Preparedness Training & Webinars	4
Emergency Preparedness for RHCs	7
Fall RHC Update Seminars	10

Visit our website at www.ruralhealthclinic.com

[Annual Evaluations](#)

[Cost Reports](#)

[RHC Startups](#)

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



Update on Palmetto Replacing Cahaba as the MAC

In our last issue of HBS Update on September 11, 2017 we announced that Palmetto GBA has won the contract award for processing of Medicare Part A and Part B claims for Jurisdiction J (Alabama, Georgia, Tennessee) which includes the out of jurisdiction RHCs still processed by Cahaba. Guidance has not yet been forthcoming on the timing of the changeover or what will happen to out of jurisdiction RHCs that have processed by Cahaba since 2009 out of their appropriate jurisdiction. While it seems logical to move these RHCs to their assigned jurisdiction with this changeover, we are not aware of any plans to do so at this time. The timing of the changeover from Cahaba to Palmetto may be delayed for some time if one of the MACs protests the award which is a relatively common event. According to the Fact Sheet on the changeover (see below) questions about the contract award should be directed to Phillip Smith in CMS' Office of Acquisition and Grants Management. Telephone (410)786-9492 or email at Phillip.Smith@cms.hhs.gov.

On September 7, 2017, the Centers for Medicare & Medicaid Services (CMS) awarded Palmetto GBA (Palmetto) a new contract for the administration of Medicare Part A and Part B Fee-for-Service (FFS) claims in the states of Alabama, Georgia, and Tennessee (A/B MAC Jurisdiction J). CMS will oversee the transfer of A/B MAC work from the incumbent contractor, Cahaba Government Benefit Administrators, LLC, to Palmetto over the next several months. CMS anticipates that implementation of the new contract will go smoothly, with few, if any, service issues for Medicare beneficiaries and providers. Learn more about this at A/B MAC Jurisdiction J Award Fact Sheet. <https://www.cms.gov/Medicare/Medicare-Contracting/Medicare-Administrative-Contractors/Downloads/JurisdictionJAwardFactSheet-09082017.pdf>

Source: Contract Award for A/B MAC Jurisdiction J (posted 9/8/2017) <https://www.cms.gov/Medicare/Medicare-Contracting/Medicare-Administrative-Contractors/Whats-New-.html>

Healthcare Business Specialists

Specializing in RAC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



CMS issues RHC Basic Training Course

RHC Mock Inspection Webinars

On August 22, 2017 CMS published RHC and FQHC Basic Training Online Course (RFBTOC) which is a series of training modules for RHC and FQHC inspectors or new RHCs. The course will take approximately 25 hours to complete. Here is the course syllabus: https://surveyortraining.cms.hhs.gov/data/99/hhs_rhc_syllabus.pdf

Rural Health Clinics (RHC) are required to comply with the Federal requirements set forth in the Medicare Conditions for Certification/Conditions for Coverage in order to receive Medicare and/or Medicaid payment. The goal of an RHC survey or FQHC complaint survey is to determine whether the RHC or FQHC complies with its applicable Conditions of Participation at 42 CFR 491, Subpart A. The link to find the RHC survey training course is as follows:

https://surveyortraining.cms.hhs.gov/pubs/ClassInformation.aspx?cid=0CMRHC/FQHC_ONL

Because most of us do not have 25 hours to spend on this training, we have condensed a large portion of the training down to a one hour webinar. If you are new to RHC or becoming a rural health clinic in the near future, this webinar will be very valuable to you.

The webinar Preparing to become an RHC - Mock Inspections will be held Sep 26, 2017 12:15 PM EDT and the link to register is:

<https://attendee.gotowebinar.com/regist.../3002497260624001794>

In this webinar, Mark Lynn, CPA and Dani Gilbert, CPA will go over the steps to become a rural health clinic or prepare for the annual evaluation from a Mock Inspection standpoint. We will go over procedures needed, steps to take, policies to update and provide tools to help with the inspection.

3

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



Emergency Preparedness Training & Webinars

On August 22, 2017 CMS issued an Emergency Preparedness Basic Surveyor Training Course. The Centers for Medicare & Medicaid Services (CMS) Survey & Certification Group (SCG) developed the Emergency Preparedness Basic Surveyor Training Course to help health and safety and Life Safety Code (LSC) surveyors and reviewers gain proficiency in surveying all affected participating providers and certified suppliers for compliance with their individual emergency preparedness requirements. Because the individual regulations for each provider and supplier type share a majority of standard provisions, this training provides consistent guidance and survey procedures for all provider and supplier types in a single course. Here is the link to the training course:

https://surveyortraining.cms.hhs.gov/pubs/ClassInformation.aspx?cid=0CMSEmPrep_ONL

We will go through the Emergency Preparedness Training Course in some detail during a webinar on September 29, 2017 at 12:15 to 1:30 Eastern time. To register for this free webinar: <https://attendee.gotowebinar.com/regist.../7594467936054034178>

In this 75 minute Emergency Preparedness Basic Surveyor Training Course (EP) we will go through the Surveyor course developed by the Centers for Medicare & Medicaid Services (CMS) Survey & Certification Group (SCG) and the Emergency Preparedness Basic Surveyor Training Course to help health and safety and Life Safety Code (LSC) surveyors and reviewers gain proficiency in surveying all affected participating providers and certified suppliers for compliance with their individual emergency preparedness requirements. Because the individual regulations for each provider and supplier type share a majority of standard provisions, this training provides consistent guidance and survey procedures for all provider and supplier types in a single course. This course will include questions and answers and you will be provided documentation that you completed the course for proof of attendance. You must score a 70% on the test to receive the certificate which should be completed and returned to HBS. (Note, the certificate is not sanctioned by any governing body but does provide you with proof that efforts to comply with these regulations are being made.) This webinar is free and preference will be given to HBS clients if all the spots are filled.

4

Healthcare Business Specialists

Specializing in RAC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



Emergency Preparedness – Due November 15, 2017

Uncle Sam wants you!!! In a new final regulation issued on September 16, 2016, effective November 16, 2016 and scheduled to be enforced starting on or after November 15, 2017 the government has enlisted 17 provider groups that participate in Medicare Part A to be defacto first responders in community disasters and emergencies by adding a condition of participation requiring providers to participate in community wide training drills annually and conducting tabletop exercises as well. There are four essential elements to the regulations which require RHCs to develop an emergency plan, emergency policy and procedures, a communication plan, and training and testing of the system. The 186-page regulation published on September 16, 2016 can be found at the following link: (note pages 182 and 183 are specific to RHCs) <https://www.gpo.gov/fdsys/pkg/FR-2016-09-16/pdf/2016-21404.pdf>

The regulations add a ninth condition of participation which could result in termination from the RHC program if the Condition Level is not achieved to the satisfaction of the RHC inspector or deeming authority. The regulations are somewhat daunting and appear to be beyond the scope of something that any individual RHC could comply without some outside resources. RHCs should reach out to the local hospital, the local Emergency Planning Committee In your county, or any of the over 500 coalitions that have formed throughout the country. See Link to the listing. [By Name By State Healthcare Coalitions - Updated 1-12-17 \[PDF, 361KB\]](#) Currently 20% of all RHCs participate in a healthcare coalition and 83% of all hospitals are in one. Hospitals can develop an integrated approach to complying with the regulation; however, each individual subunit or in this case rural health clinic must have a plan that will comply on its own.

There is also an organization that has been established to assist with emergency preparedness by the U.S. Department of Health and Human Services (HHS) called the Office of the Assistant Secretary for Preparedness and Response (ASPR) which sponsors the ASPR Technical Resources, Assistance Center, and Information Exchange (TRACIE).

5

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



TRACIE is like the Regional Extension Centers that assisted with Meaningful Use except for Emergency Preparedness. Here is the link: <https://asprtracie.hhs.gov/> . I would start with ASPR TRACIE as it has policies and procedures and information to help health providers comply with these regulations. We have a sample policy and procedure for RHCs on our website at www.ruralhealthclinic.com as well. One of the best ways to understand the regulation is spend 50 minutes watching the Emergency Preparedness Requirements MLN Connects® webinar on October 5, 2016. Here is the link: <https://www.youtube.com/watch?v=GcPdw4nZuU>.

Here is a sample of the regulation with just the highlights. The actual regulation as more detail on what is expected and Interpretative guidelines are due out any day to provide additional insight on what is expected from rural health clinics.

§ 491.12 Emergency preparedness.

The Rural Health Clinic (RHC) must comply with all applicable Federal, State, and local emergency preparedness requirements. The RHC must establish and maintain an emergency preparedness program that meets the requirements of this section. The emergency preparedness program must include, but not be limited to, the following elements:

- (a) *Emergency plan.* The RHC must develop and maintain an emergency preparedness plan that must be reviewed and updated at least annually.
- (b) *Policies and procedures.* The RHC must develop and implement emergency preparedness policies and procedures, based on the emergency plan set forth in paragraph (a) of this section, risk assessment at paragraph (a)(1) of this section, and the communication plan at paragraph (c) of this section. The policies and procedures must be reviewed and updated at least annually....
- (c) *Communication plan.* The RHC must develop and maintain an emergency preparedness communication plan that complies with Federal, State, and local laws and must be reviewed and updated at least annually....
- (d) *Training and testing.* The RHC must develop and maintain an emergency preparedness training and testing program....

Good luck in implementing this regulation. I would get started as early as possible to meet the compliance deadline as it will be difficult to respond timely if the RHC receives a

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



condition level deficiency for Emergency Preparedness. If you have any questions, please email them to me at marklynnrhc@gmail.com. Here are some resources that will help you with the implementation of the Emergency Preparedness regulations.

Please find attached a video of our webinar on Emergency Preparedness in July, 2017.

https://www.youtube.com/watch?time_continue=15&v=gipvS6Zlek0

Kate Hill from The Compliance Team has a great article on Emergency Preparedness in the Summer edition of the NARHC Newsletter:

<http://files.constantcontact.com/d9ff9a02301/e364c9f0-2f7f-4a53-9c40-a2c492f4e47d.pdf?ver=1500508600000>

Here is a link to the Interpretive Guidelines for Emergency Preparedness:

<https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-17-29.pdf>

I will be speaking at the NARHC Fall Institute in Indianapolis, Indiana on October 19th, 2017 from 8:40 to 9:45 AM regarding Emergency Preparedness for Rural Health Clinics. Here is a link to Register for the Institute and the Agenda:

<https://narhc.org/events/2017-fall-inst/>

<https://narhc.org/wp-content/uploads/2017/06/AGENDA-F17-Final.pdf>

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



RuralHealthClinic.com
Experienced Knowledge

Fall RHC Update Seminars

This year the RHC Update seminars will focus on RHC Billing (Medicare) and Emergency Preparedness, Cost Reporting, Annual Evaluations, and TennCare Quarterly Wrap Reporting (Tennessee Only). The RHC Update Seminar will cost \$250 for the entire day. If you only need to attend the morning session or the afternoon session the fee is \$175.

The morning session is on Medicare Billing for RHCs. The entire morning will be on Medicare Billing for RHCs and the session will run from 8:45 to 12:00. If you only want to attend this session use the discount code BILLING and the professional fee will \$175. The session will include a USB drive with complete up to date billing information for RHCs including Billing Policies and Procedures.

If we prepare your cost report or are doing your startup (and you are current on your bill), there is no charge for two EMPLOYEES. (Your consultant is welcome, but they cannot be a free person - they must pay the full charge) After two employees, the normal fees apply. The discounts are for only cost report and startup clients only. Lunch is on your own. Everyone will receive a Certificate of Completion for Emergency Preparedness documentation USB drive with all of our presentations, forms, templates, billing documents including a model fee schedule derived from the QVL listing with HCPCS and Medicare allowables presented, cost reporting files, policies and procedures, and annual evaluation documents. We will not print the presentations, but will provide them via links before the seminars.

8

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



Fall RHC Update Seminar Locations – 2017

Here are the locations for the Fall RHC Update seminars. You can sign up on the Registration Link provided on the right.

Date	Location	Hotel	Registration Link
10/26/2017 8:30 to 4:30	Nashville, Tennessee	Tennessee Hospital Assoc. Virginia Way Conference Ct 5201 Virginia Way Telephone: (615) 401-7436 Brentwood, TN 37027	http://events.constantcontact.com/register/event?llr=h9cmzvdab&oeidk=a07ee0gw23bb0c07466
10/27/2017 8:30 to 4:30	Cleveland, Tennessee	Fairfield Inn and Suites Cleveland 2815 Westside Drive Telephone: (423) 664-2501 Cleveland, TN 37312	http://events.constantcontact.com/register/event?llr=h9cmzvdab&oeidk=a07eeiabsiu69081e82
11/2/2017 8:30 to 4:00	Birmingham, Alabama	Courtyard Birmingham Colonnade/Grandview 4300 Colonnade Parkway, Birmingham, AL 35243 Telephone: (205) 967-4466	http://events.constantcontact.com/register/event?llr=h9cmzvdab&oeidk=a07ee0gw2apfbc0cb8c
11/3/2017 8:30 to 4:00	Little Rock, Arkansas	Residence Inn by Marriott Little Rock 219 Rivermarket Avenue Little Rock, Arkansas 72201 Telephone (501)-376-7200	http://events.constantcontact.com/register/event?llr=h9cmzvdab&oeidk=a07ee0gw2hi8cd6b14c
11/10/2017 8:30 to 4:00	London, Kentucky	London Community Center 529 S Main St, London, KY 40741 Telephone: 606) 864-7777	http://events.constantcontact.com/register/event?llr=h9cmzvdab&oeidk=a07ee0gw2o4c7c933f7

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



RuralHealthClinic.com
Experienced Knowledge

RHC Update Seminar Schedule

Time	Subject
8:30 AM to 8:45 AM	Registration
8:45 AM to 12:00 PM	RHC Billing Seminar – An update on Cahaba losing the Medicare Part A and Part B Processing contract and the transition plan. RHC Medicare Billing for RHCs. Basics to more advanced topics.
12:00 to 1:00 PM	Lunch (on your own)
1:00 to 3:00 PM	Emergency Preparedness (2 hours) (Includes a certificate of completion for documentation purposes) Cost Reporting and Annual Evaluations (1 hour)
4:00 to 4:30 PM	Tennessee Seminars Only: TennCare Wrap Payment and reporting. Questions and answer session on how to complete the report and how to avoid paybacks and stay in compliance with TennCare requirements.

10

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



Pricing for the RHC Seminar

The professional fee is \$250.00 for the entire day including both the morning and afternoon. Lunch is on your own.

If you would like to only attend the morning BILLING session use the discount code BILLING and the fee will be discounted to \$175.

If you want to only go to the afternoon session use the discount code EMERGENCY and the fee will be discounted to \$175.

If you are a cost report or startup client of Healthcare Business Specialists you may use discount code for up to 2 EMPLOYEES and there will be no fee for the seminar. If you think you qualify, email Mark Lynn at marklynnrhc@gmail.com to determine if you qualify and I will provide the discount code.

Other Information

Coffee and Orange Juice will be provided in the morning, soft drinks available during the day, and a snack at the afternoon break. Lunch is own your own and is from 12:00 to 1:00.

We do not block or discount rooms, so the hotel may not know we are there. We are. Catering handles our contracts and sometimes they do not talk to reservations. There are no special rates that the hotel offers due to the small number in our group. We offer a 100% refund if you cannot attend as long as we know within 7 days of the seminar. Emergencies will be refunded if you call us. If you do not call or show up, there is no refund.

11

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



Each person will be receiving a USB drive with 100's of files to help you manage you're Rural Health Clinic. The files include a policy and procedure manual with new policies to help manage your RHC, Annual Evaluation documents and templates, Cost Report workpapers and tools, and introducing the Line Item Benchmarking reports from RHC Cost Reports. We now have access to every RHC Cost Report in a data file and we have benchmarked 100 of the cost reports by Worksheet A line item. This will help you manage your expenses and help evaluate your expenses.

Additionally, the USB drive will include Emergency Preparedness files including policy and procedures, communication plan templates, Work Plans, and resources.

For More Information

For more information on the services of Healthcare Business Specialists including RHC cost reporting, annual evaluations, and startups or to view the resume of the primary speaker for this seminar, please go to our website at: www.ruralhealthclinic.com



Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



RHC Update Seminar Registration Form

Please complete the following registration information. Tell us about yourself (additional attendees from the same organization should use separate forms) – we must have an email address for each attendee to register and send materials.

Information Requested	Please Provide Information
Seminar Location	
Name	
Clinic	
Address (1)	
Address (2)	
City, State, Zip	
Telephone	
Email	

Please Provide Payment information on the next page

13

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



RHC Update Seminar Payment Information

Payment Information

Payment Source	How to Pay	Credit Card Information
Sending Check	Mail to: Check to: HBS Healthcare Business Specialists Suite 214, 502 Shadow Parkway Chattanooga, TN 37421	
Pay Pal	Email to la_vita_nouva@hotmail.com	
Mastercard, Visa, or Discover	Provide: Credit Card Number	_____
	Provide: Expiration Date:	_____
	Provide: Security Code	_____
Signature	Please sign for Credit Cards	_____

Please email or these two pages to Mark R. Lynn, CPA at marklynnrhc@gmail.com or fax to (800) 268-5055. Once we receive your information either via the mail, fax, or internet registration, we will prepare an invoice and mark it paid, email it to you with a Confirmation number indicating that we have received your payment and have a spot for you at the seminar.

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



More Information

For more information on the services of Healthcare Business Specialists including RHC cost reporting, annual evaluations, and startups or to view the resume of the primary speaker for this seminar, please go to our website at:

www.ruralhealthclinic.com

Become a Fan and like us on Facebook

We have a Facebook Fan page which is filled with information on a daily basis regarding rural health clinics. Why wait till Friday to find out what is going on? Become a fan by following the link and liking us.

<http://www.facebook.com/pages/Healthcare-Business-Specialists/123096777748776>

Youtube Channel with RHC Webinars

HBS has started a YouTube Channel and it has all the recordings of previous webinars on it. Here is the link:

[RHC YouTube Video and Webinar Channel with Recorded Webinars](#)

Recorded Webinars on RHC Billing, Cost Reporting, Certification, and Annual Evaluations

15

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185



H B S

Healthcare Business Specialists

Healthcare Business Specialists is a Chattanooga, Tennessee-based consulting firm which specializes in rural health clinic reimbursement and prepares rural health clinic cost reports, annual evaluations, provider re-enrollment, and RHC startups. Mark R. Lynn is trained as a certified public accountant and has over 35 years' experience in the healthcare field with almost 25 years of experience devoted almost exclusively to rural health clinics. We have been conducting rural health clinic seminars for over 25 years.

[Annual Evaluations](#)

[Cost Reports](#)

[RHC Startups](#)

Mark R. Lynn
RHC Consultant
Suite 214, 502 Shadow Parkway
Chattanooga, TN 37421
Telephone: (423) 243-6185
Fax: (800) 268-5055
Email: marklynnrhc@gmail.com
Website: www.ruralhealthclinic.com

Healthcare Business Specialists

Specializing in RHC reimbursement

Suite 214 502 Shadow Parkway Chattanooga, TN 37421

Email: marklynnrhc@gmail.com

Website: www.ruralhealthclinic.com

Telephone: (423) 243-6185