



SOUTH CAROLINA OFFICE OF
RURAL HEALTH

Investment. Opportunity. Health.

Biennial Evaluation
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The Rules - 42 CFR 491

This is the Code of Federal Regulations (CFR) which stipulates rural health clinics' conditions for certification.

http://www.cms.gov/Regulations-and-Guidance/Legislation/CFCsAndCoPs/RHC_FQHC.html

- 12 Sections!!

Biennial Review

- In September 2019, Annual review became biennial review. The final rule changed the Policy Review and Annual Evaluation requirements.
- <https://www.federalregister.gov/documents/2019/09/30/2019-20736/medicare-and-medicaid-programs-regulatory-provisions-to-promote-program-efficiency-transparency-and>

Biennial Evaluation

- Purpose of the evaluation is to determine whether:
 - 1. The utilization of services was appropriate.
 - 2. The established policies were followed
 - 3. Any changes that are needed



Steps for Success

- Policy and Procedure Manual Review
- Clinic Walkthrough
- Chart Audit
- Report
- Emergency Preparedness Review/Drills



Committee Members

- Medical Director
- NP or PA
- Clinic Manager/Business Office Supervisor
- Clinic Nursing Department
- **Non Member** of your clinic



Policy and Procedure Manual

- **Tab 1**-Organizational Chart and List of Employees
- **Tab 2**-Clinic Information/ Copies of Professional Licenses for Physicians and Mid-levels
 - ✓ Medical License
 - ✓ CVs
 - ✓ NP/PA Protocols/Agreements
 - ✓ Drug Enforcement Authority Prescriptive Permit
 - ✓ State Prescribing License
 - ✓ Certificate of Liability Insurance
 - ✓ CLIA Certificate
 - ✓ Business License

- **Tab 3**- Agreements-
 - ✓ Medical Director
 - ✓ Hospital Privileges
 - ✓ Laboratory Agreement
 - ✓ Bio-Waste Agreement
 - ✓ Confidentiality Agreement (If outside cleaning crew)
- **Tab 4**- Periodic Chart Reviews- Follow your policy
- **Tab 5**- Disaster Drills- Fire Drill, Bomb Threat, Severe weather, Evacuation Plan

- **Tab 6**-Preventative Maintenance
 - ✓ Copy of letter from certified electrician
 - ✓ CPR Certification
 - ✓ Refrigerator temperature log
- **Tab 7**-Miscellaneous
 - ✓ Exam Room Cleaning Chart
 - ✓ Checklist for Sample Drugs
 - ✓ Emergency Kit- Supplies list out
 - ✓ Encounter Form
 - ✓ Anti-Discrimination Policy

- **Tab 8-** Prior Annual/Biennial Evaluations
 - ✓ Evaluation – Typed up document that lays out what you found during review. This is where you want to catch errors so inspector doesn't. Signed by committee members.
 - ✓ Clinic Inspection- Look at your clinic from the eyes of a two year old.
 - ✓ Chart Review (10 Active and 5 Inactive)

Clinic Walkthrough

- A clinic walkthrough must be completed as part of your Evaluation process.
- This includes:
 - Room Review
 - Waiting Room
 - Bathrooms
 - Supplies
 - Medications
 - Equipment
 - Staff Education

Physical Plant and Environment

- Exit signs are clearly marked at each exit.
- Exit routes are free of barriers. Doors are locked from outside but allow exit from inside.
- Diagrams indicating Emergency exits are present.
- Clinic is clear of clutter and is clean.
- Fire extinguishers are checked monthly by staff.
- Fire Drills and emergency drills are conducted and documented at least annually.
- Overhead ceiling lights are free of bugs and debris.
- Clinic does not have any exposed building materials.

- Electrical sockets are covered when not in use.
- Bathroom/clinic is handicapped accessible.
- Clinic has handicap parking spots.
- Bathrooms do not contain personal hygiene products.
- Adult and Pediatric scales are balanced at least annually.
- AED is maintained and tested in accordance with manufacturer recommendations.
- Cleaning policies are in place and followed.
- List of all equipment by manufacturer, model and serial number.
- Preventive maintenance due dates are tracked.

Laboratory

- The lab has a CLIA certificate.
- Refrigerator and Freezer temperatures are recorded daily.
- Lab Equipment is calibrated accordingly.
- External control results are logged.
- No food is stored in refrigerators that are used for vaccines/samples.
- Nothing is stored on the door in a freezer or refrigerator.
- Reagents strips and supplies are dated when opened?

Room Review

- Do not contain hazardous materials. (Cleaners, drug samples, etc.)
- Nothing is under the sinks.
- Electrical Outlets are covered when not in use.
- Sharps containers are secured.
- All supplies are in date.
- Supplies should be clean with no dust or debris.
- Equipment is cleaned and disinfected prior to each patient's use.
- Equipment is not stored on floor.

- Preventative Maintenance stickers on appropriate equipment.
- Exam tables do not contain rips or tears.
- Countertops are clean and not cracked.
- Review lights, walls, and flooring.
- No meds in patient rooms.

Waiting Room

- Infection Control Policies are followed.
- Outlets covered.
- No exposed building material.

Drugs and Biologicals

- Drug samples are reviewed monthly and documented.
- Samples are stored in a secure area without patient access.
- Samples are logged should a recall be issued. If completed in EMR, ensure that you are able to run a report on it.
- All medications are stored with no patient access.
- Multidose vials, ointments, and solutions are dated when opened and discarded in accordance with policy.
- Expired medications, biologicals, and supplies are discarded in accordance with policy.

Controlled Meds

- All controlled meds should be double locked and all transactions recorded.
- Log should be verified weekly by management.



Monthly Logs

- Sample Closet
- Emergency Kit
- Oxygen
- AED- Visual Check, Battery Check, Pads,
- Eye Wash Station (Weekly)



Staffing

- Change in Staff since last review?
- PPD status
- Staff is performing as expected – no clinical or administrative actions.
- BLS Certified?
- Staff have participated in emergency training?



Additional Items

- Hours of operation are posted
- CPR certification is up to date
- Improvements in the office or Parking Lot?
- Adding or Changing EMRs?
- Any new services that you are providing?
- Medical director is identified
- Owner of clinic is disclosed and documented.

Chart Review

- 10 Active Charts and 5 inactive charts.
- 5 inactive- Transferred, Terminated or Deceased.
- When reviewing charts we are looking for the following:
 - ✓ Records are in good order- Vitals, Current Meds, Clean and clear documentation.
 - ✓ Labs, radiology and consults were recorded and documented.
 - ✓ Authorization to treat
 - ✓ Insurance verification
 - ✓ Provider signature
 - ✓ HIPAA

Clinic Numbers

- What is your RHC Volume?
- Payer Mix
- CPT Code Analysis by Provider



Evaluation Report

- Report should consist of all findings from Walkthrough, Chart Audit and Policy review.
- Should be signed by all committee members



Emergency Preparedness

- Must address an emergency on-site, off-site and disruption of service.
 - Developing the RHC EP Plan
 - EP Policy and Procedures
 - EP Communication Plan
 - EP Training and Testing Program

Resources

- Rural Health Information Hub
<https://www.ruralhealthinfo.org/topics/rural-health-clinics>
- Medicare Claims Processing Manual [Chapter 13 - Rural Health Clinic \(RHC\) and Federally Qualified Health Center \(FQHC\) Services \[PDF, 581KB\]](#)
- National Association of Rural Health Clinics
<https://narhc.org/resources/rhc-rules-and-guidelines/>

Questions?



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