

# Rural Health Clinic Compliance What are the Requirements?

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NOSORH Technical Assistance (TA) Director

For AL TTA3: 2/26/2025

National Organization of **State Offices of Rural Health**

# Hi! I'm Tonne



- Earned an MS in Psychological Science from Shippensburg University
- Current doctoral candidate in the Experimental Psychology program with an emphasis in rural health at Idaho State University
- Nearly 10 years of rural health experience
- Holds Certified Rural Health Clinic Professional (CRHCP) credentials
- Holds Lean Six Sigma Green Belt status

ALABAMA OFFICE OF  
**PRIMARY CARE  
RURAL HEALTH**



Thank you to Karl Bryant!

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**State Offices of Rural Health**

# Upcoming Webinars

1. Rural Health Clinics (RHCs) Compliance Overview Part 2

**I. Date:** Wednesday, April 9, 2025

**II. Time:** Noon – 1 p.m. CT

2. Rural Health Clinics (RHCs) Compliance Overview Part 3

**I. Date:** Wednesday, April 30, 2025

**II. Time:** Noon – 1 p.m. CT

3. Rural Health Clinics (RHCs) and Community Engagement

**I. Date:** Wednesday, May 28, 2025

**II. Time:** Noon – 1 p.m. CT

4. Rural Health Clinics (RHCs) Strategic Planning

**I. Date:** Wednesday, June 25, 2025

**II. Time:** Noon – 1 p.m. CT

# Objectives

1. Overview of 42 CFR 491
2. Statute vs Guidance - understanding the difference
3. Be able to navigate the CMS RHC Center to find your resources



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# 42 CFR 491



§ 491.1	<a href="#"><u>Purpose and scope.</u></a>	§ 491.7	<a href="#"><u>Organizational structure.</u></a>
§ 491.2	<a href="#"><u>Definitions.</u></a>	§ 491.8	<a href="#"><u>Staffing and staff responsibilities.</u></a>
§ 491.3	<a href="#"><u>Certification procedures.</u></a>	§ 491.9	<a href="#"><u>Provision of services.</u></a>
§ 491.4	<a href="#"><u>Compliance with Federal, State and local laws.</u></a>	§ 491.10	<a href="#"><u>Patient health records.</u></a>
§ 491.5	<a href="#"><u>Location of clinic.</u></a>	§ 491.11	<a href="#"><u>Program evaluation.</u></a>
§ 491.6	<a href="#"><u>Physical plant and environment.</u></a>	§ 491.12	<a href="#"><u>Emergency preparedness.</u></a>



# Code of Federal Regulations

A point in time eCFR system



## Title 42



Displaying title 42, up to date as of 3/14/2024. Title 42 was last amended 3/11/2024. [view historical versions](#)

Enter a search term or CFR reference (eg. fishing or 1 CFR 1.1)



[Title 42](#) / [Chapter IV](#) / [Subchapter G](#) / [Part 491](#) [View Full Text](#)

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### ECFR CONTENT

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Part / Section

#### ▼ Chapter IV Centers for Medicare & Medicaid Services, Department of Health and Human Services

400 – 699

#### ▼ Subchapter G Standards and Certification

482 – 498

#### ▼ Part 491 Certification of Certain Health Facilities

491.1 – 491.12

#### ▼ Subpart A Rural Health Clinics: Conditions for Certification; and FQHCs Conditions for Coverage

491.1 – 491.12

§ 491.1 Purpose and scope.

§ 491.2 Definitions.

§ 491.3 Certification procedures.

§ 491.4 Compliance with Federal, State and local laws.

§ 491.5 Location of clinic.

§ 491.6 Physical plant and environment.

§ 491.7 Organizational structure.

§ 491.8 Staffing and staff responsibilities.

§ 491.9 Provision of services.

§ 491.10 Patient health records.

§ 491.11 Program evaluation.

§ 491.12 Emergency preparedness.





# State Operations Manual

## Appendix G - Guidance for Surveyors: Rural Health Clinics (RHCs)

Table of Contents  
*(Rev. 200, 02-21-20)*

### [Transmittals for Appendix G](#)

#### Part I – Survey Protocol

##### Introduction

##### Regulatory and Policy References

##### Rural Health Clinic Survey Protocol

###### Introduction

- Task 1 – Off-Site Survey Preparation
- Task 2 – Entrance Activities
- Task 3 – Information Gathering/Investigation
- Task 4 – Preliminary Decision Making and Analysis of Findings
- Task 5 – Exit Conference
- Task 6 – Post-Survey Activities





# **State Operations Manual**

## **Appendix Z- Emergency Preparedness for All Provider and Certified Supplier Types**

### **Interpretive Guidance**

**Table of Contents**  
*(Rev.186, Issued: 03-04-19)*

# Walkthrough and Comparison

1. <https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-G/part-491?toc=1>
2. <https://www.cms.gov/files/document/appendix-g-state-operations-manual>
3. <https://www.cms.gov/files/document/qso-21-15-all.pdf>

# Drugs and Biologicals

- Multi-dose vial
- Single-dose vial
  - Testosterone
    - Secured
  - Not expired

# Program Evaluation

★ Biennial review ★

# Emergency Preparedness

- MUST
  - Have a plan & policy
    - specify the RHC
  - Complete RHC's own Risk Assessment
    - All hazards approach
  - Practice and document!

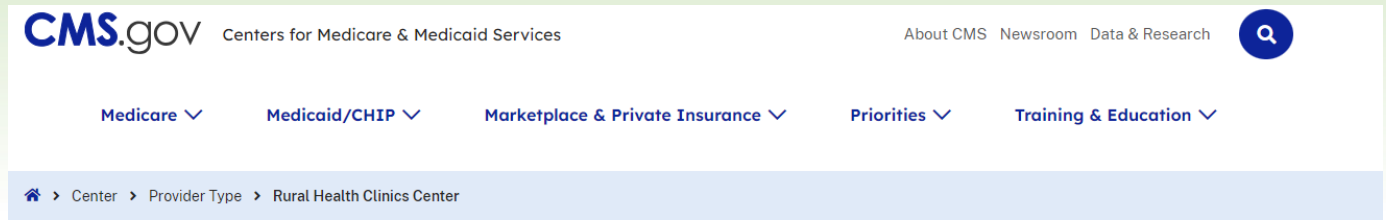
# Alabama's Surveys

158 RHCs (96 Provider-Based)

94 Surveys in 5 years

208 Deficiencies in 5 years

# CMS – Rural Health Clinics Center



## Rural Health Clinics Center

### Spotlights

- > PrEP for HIV: Prepare for Potential Medicare Part B Coverage
- > End of the COVID-19 Public Health Emergency (PHE)
- > CY 2024 Physician Fee Schedule (PFS) Final Rule Effective January 1, 2024
- > CY 2024 Outpatient Prospective Payment System (OPPS) Final Rule Effective January 1, 2024
- > Care Management Services
- > CY 2024 Payment Rates

### Important Links

Billing / Payment

CMS Manuals & Transmittals

<https://www.cms.gov/center/provider-type/rural-health-clinics-center>



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# Additional Resources

- RHC Covered Services – CMS Chapter 13: <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/bp102c13.pdf>
- Medicare Claims Processing Manual – Chapter 9: <https://www.cms.gov/regulations-and-guidance/guidance/manuals/downloads/clm104c09.pdf>
- CMS RHC Center: <https://www.cms.gov/Center/Provider-Type/Rural-Health-Clinics-Center>

# Additional Resources



- 42 cfr 491: <https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-G/part-491?toc=1>
- QCOR: [https://qcor.cms.gov/index\\_new.jsp](https://qcor.cms.gov/index_new.jsp)
- State Operations Manual: Appendix G - Guidance for Surveyors: Rural Health Clinics (RHCs): <https://www.cms.gov/files/document/appendix-g-state-operations-manual>
- State Operations Manual: Appendix Z- Emergency Preparedness for All Provider and Certified Supplier Types Interpretive Guidance: <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertEmergPrep/Downloads/Appendix-Z-EP-SOM-February-2019.pdf>

# National Rural Health Day

Celebrating the **Power of Rural!**®



## November 20, 2025

Always the third Thursday of November

# Next Webinar Session



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# *Questions?*



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# ***THANK YOU!!!***

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