

RURAL **HEALTH** WORKSHOP

# Common Deficiencies in the Rural Health Clinic



# Speaker

- Wendy Sablatura
  - RHC Surveyor
  - The Compliance Team



# Rural Health Clinic Compliance



# Today's Objectives



Learn the most commonly seen deficiencies found in RHC surveys.

Learn tips to prevent the common deficiencies

Discover methods to stay compliant.

# Deficiencies

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## Standard Level:

- Standard level deficiencies are deficient practices that pose low threat to health and safety. Must be resolved within 60 calendar days from the date of survey.

## Condition Level:

- Condition level deficiencies are deficient practices that pose a serious threat to health and safety. Must be resolved within 45 calendar days from the date of survey.
- Multiple standard level deficiencies could lead to a CONDITION level citation.

## Immediate Jeopardy:

- Immediate Jeopardy is an immediate threat to health or safety and requires immediate attention and resolution.



# Medication Vials



Single dose vials being utilized as a multi-dose vial. Most cited - Lidocaine

Single and multi dose vials found stored past the manufacturer printed expiration date

Open multi-dose vials stored past the 28 day Beyond Use Date

Refrigerated multi-dose vaccines and tuberculin (TST)

Check open vials on a regular basis or use basket method

# Sterilization of Instruments



- The clinic is not following their process for handling and sterilization of non-disposable instruments.
- The clinic is not following the MFU for the autoclave.
- The clinic is not following their policy for accepting sterilized instruments from the hospital or other outside source.
- Cold sterilization is not acceptable.

# Patient Care Equipment & Supplies

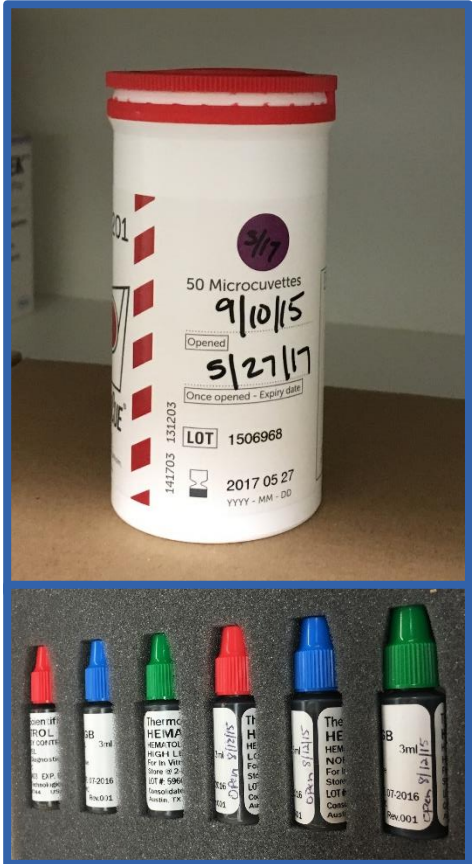
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- Patient care equipment is not checked according to manufacturers instructions for use.
- Exam bed covers have frayed corners or tears in the cover.
- Broken or obsolete equipment not labeled “Do Not Use”.
- Patient care items stored directly on the floor.
- Single Patient Use Items such as Suture Removal Kits, Sterile Water, Normal Saline, Iodoform Gauze, Steri-Strips



# Point of Care Tests



- Clinic must have the ability to perform all 6 required point of care tests. Hemoglobin or Hematocrit, Blood Glucose, Pregnancy, Urinalysis by stick or tablet, Culturing, Occult blood in the stool.
- Most common tests the clinic is unable to perform are:
- Hemoglobin or Hematocrit - No equipment and/or supplies
- Blood Glucose - not using a meter for Multiple Patient Use
- Testing for occult blood in the stool - Providing mail in test only
- All reagents, strips, controls, etc., must be in date - these are expired or not present in the clinic

# Emergency Services



- A list of medications approved by the Medical Director and NP or PA is missing from clinic policy.
- Approved medications are missing from the emergency medication kit.
- Expired medication and supplies found in the emergency medication kit.
- No emergency medication kit found in the clinic.



# Helpful Links



## 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 [applicable laws, regulations, and compliance information](#)

Learn how RHC providers did on performance surveys by searching [Survey and Certification's Quality, Certification and Oversight Reports \(QCOR\)](#)

[Find more information about billing care management services in the Care Management Services in RHCs and FQHCs FAQs](#)

# Helpful Websites

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## 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](#)

[Facebook Group – Rural Health Clinics Information Exchange](#)

## Regional Office Rural Health Coordinators

Get contact information for [CMS Regional Office Rural Health Coordinators](#) who offer technical, policy, and operational help on rural health issues

# Contact Information

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**Questions?**

# We want to hear from you!

<https://www.surveymonkey.com/r/BW59S9F>



# RURAL **HEALTH** WORKSHOP

**Networking Lunch: 11:45 a.m. – 1:00 p.m.**

