Annual Evaluation-Peer Review

Spoof it up with Marketing and Data to create outcomes.

Glen Beussink
Development & Education
Annual Evaluation
Not a medical Procedure

What you should learn
• What is an Annual Evaluation, 491.11?
• When must it take place?
• Who completes it for the clinic? (policy)
• What occurs during the process?
• Facilitator?
Annual Evaluation
Not a medical procedure

• What is it?
  - An Annual Evaluation is a requirement that must be fulfilled to maintain RHC status. The goal is to review the operations of the RHC on an annual basis and show improvement. CFR 491.11
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• When must it take place?
  - The Evaluation must be completed once each 12 month period.
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• Who completes it for the clinic?
  - By following section CFR 491.11 you can complete the annual review or have someone with RHC experience facilitate the review of your RHC. One person should not be an employee of the clinic.
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What occurs during the process?

- **Sec. 491.11 Program evaluation.**
  a) The clinic or center carries out, or arranges for, an Annual Evaluation of its total program.
  b) The Evaluation includes review of:
     1) The utilization of clinic or center services, including at least the number of patients served and the volume of services;
     2) A representative sample of both active and closed clinical records; and
     3) The clinic's or center's health care policies.
  c) The purpose of the Evaluation is to determine whether:
     1) The utilization of services was appropriate;
     2) The established policies were followed; and
     3) Any changes are needed.
  d) The clinic or center staff reviews the results of the Evaluation and takes corrective action if necessary
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b) The Evaluation includes review of:
   1) The utilization of clinic or center services, including at least the number of patients served and the volume of services;
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b) The Evaluation includes review of:

2) A representative sample of both active and closed clinical records.
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b) The Evaluation includes review of:

3) The clinic's or center's health care policies.
   - The policies are developed with the advice of a group of professional personnel that includes one or more Physicians and one or more Physician Assistants or Nurse Practitioners. **At least one member is not a member of the clinic or center staff.**
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c) The purpose of the Evaluation is to determine whether:
(1) The utilization of services was appropriate;
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c) The purpose of the Evaluation is to determine whether:
   2) The established policies were followed;
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c) The purpose of the Evaluation is to determine whether:
3) Any changes are **needed** to **improve** the program.
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d) The clinic or center staff reviews the results of the Evaluation and takes corrective action if necessary.
Such as...Sec. 491.6 Physical plant and environment.

a) Construction. The clinic or center is constructed, arranged, and maintained to insure access to and safety of patients, and provides adequate space for the provision of direct services.

b) Maintenance. The clinic or center has a preventive maintenance program to ensure that:
   1) All essential mechanical, electrical and patient-care equipment is maintained in safe operating condition;
   2) Drugs and biologicals are appropriately stored; and
   3) The premises are clean and orderly.

c) Emergency procedures. The clinic or center assures the safety of patients in case of non-medical emergencies by:
   1) Training staff in handling emergencies;
   2) Placing exit signs in appropriate locations; and
   3) Taking other appropriate measures that are consistent with the particular conditions of the area in which the clinic or center is located.
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Here is a list of documents you may refer to during your Annual Evaluation:

• CMS – 30, Rural Health Clinic Survey Report (dated 1978)
• Chapter 13, RHC Benefits Manual, 12/31/2015
• Chapter 9 RHC Claims Processing Manual, 12/31/2015

Note, Changes are happening April 1, 2016 and Chapter 9 is expected to be updated soon.
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Building a taller building,  
Has to have a better design.
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What is the difference between Nitrous Oxide and Liquid Nitrogen?

How can you see if your eyes are blurred? There is nothing better than Peer Review.
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Tell about it in Pictures

Are you “inspecting what you expect?”
W. Edward Deeming

Do you have unlocked poisons, pap solutions?
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Tell about it in Pictures

20 day rule, always check with the CDC

Liquid Nitrogen, don’t under estimate the dangers

Strap um and cap um.....
New Accreditation for Rural Health Clinic

• AAAASF– Quad A –SF, [www.aaaasf.org](http://www.aaaasf.org) (American Association for Accreditation Ambulatory Surgery Facilities)
• TCT -The Compliance Team [www.thecomplianceteam.org](http://www.thecomplianceteam.org)
• Yes there is a fee!
• Deemed Status Agency, what does this mean?
• All states will not Survey, or delay for much longer, RHC become a Tier 4 Process

Are you considering a New RHC, get help and do it fast, beat the process. It’s a daunting process and days matter in the total cost.
New Rules to Consider for your Rural Health Clinic

- New Emergency Preparedness, 491.12
- Limited English Proficiency
- Provider Services Policy, Audit and Policy Tool

Are you considering a New RHC, get help and do it fast, beat the process. It’s a daunting process and days matter in the total cost.
Annual Evaluation

Would you consider your curb appeal, if it were at McDonalds?

• Walk in a door you never enter. Better yet, ask for someone you can trust to give you honest feedback as to the appealing nature of your entrance.
• Clean up all the notice in your practice. Look around, do you have so many notices that you can’t see the receptionist?
• How is the rest room in the waiting area?
• Does the curb appeal invite you into a clean clinic and are the weeds and clutter a distraction, worse yet, send the wrong signal?
• Have you or a friend called your clinic to challenge your clinic staff for proper phone skills?
• Have you considered “firing” someone?
Annual Evaluation
Where is your customers going?

- Consider, there are 4,000 Rural Health Clinics
- Consider, that there are already 8,000 Urgent Care Centers

Walgreens, Walmart, CVS and a whole host of businesses are getting into the primary care business. They want your CUSTOMERS in their business. They want the cream and you get the tougher patients, for the same reimbursement.

Should you be looking during this process for new business Services?
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Selling your practice

• Join the local Chamber of Commerce, Rotary or Medical Group Managers Assn.
• Network with local Dentist office, they are looking for networking opportunities.
• Talk to the community organizations, they are looking for speakers. You don’t have to be a professional speaker, just talk from the heart. (show you care for your clinic & your patients)
• Get free advertisement in the papers or radio, when you attend a conference or your providers attend conferences or get certified in a new process.
• Set up a free blood screening.
• Extend your hours. (Wal-Greens did)
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Peer Review

We (healthcare) are not a very understanding group when it comes to our patients. Especially when it comes to billing issues, they simply don’t know. Especially to the elderly.

Medicare is in the process of benchmarking all providers and Rural Health Clinics will be compared in the future.

Are you training you staff?
What data are you tracking to understand the habit of your patients?
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Peer Review

• Pediatric Vaccines For Children, when they are due and call the parents.
• Cost Report Benchmarking.
• Charge Master Review.
• Revenue Cycle, Peer review of the clinic E & M and procedure code and surgical procedures charge master review.
• Early and Periodic Screening Testing and Diagnostic (EPSTD) visit for children. When are they due, how often, reach out to the patients.
• Wellness visits for Medicare, how do you rank with compliance to your patients.
• Nursing Home Encounter, should this be a service of your clinic.
• Assisted Living, should this be a service you offer.
• Customer Satisfaction, you must be doing this, just because its right.
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Something to Think About

• Healthcare Payer News reported recently that Medicaid provided coverage to 1 in 4 Americans. Covering nearly 1/2 child births, 1/3 of all children, 2/3 adults in Nursing Homes.

• How will you meet these future need?
Thank You National Assn of Rural Health Clinics for allowing me to present what I believe to be one of the most important things to do to complete a full RHC Annual Evaluation/Peer Review.

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