

RHC Productivity Standards During COVID

Do I need an exception? What about Telehealth?

We know many Rural Health Clinics have experienced lower than normal volumes in 2020 due to COVID-19. Many have turned to telehealth to see patients during this period. These two combined will have an effect on next year's cost report calculations and productivity standards.

CMS has acknowledged this challenge in the July 6 MLN Matters: "Many RHCs have had to change the way they staff their clinics and bill for RHC services during the COVID19 public health emergency (PHE). As a result, these RHCs may have difficulty in meeting the productivity standards. To minimize the burden on RHCs, exceptions to the productivity standard may be granted by your MAC during the COVID-19 PHE. Further direction will be forthcoming from your MAC." (Link to full publication: <https://www.cms.gov/files/document/se20016.pdf>)

What does this mean for me?

There is nothing to do right now! Your cost report preparer will need to review your clinic's volumes and whether or not you need to request exceptions to the productivity standard when it is time to complete your 2020 cost report. Several MACs have published guidance on how to request an exception to the clinic's productivity standard. Palmetto, Novitas and First Coast Service Options will accept requests WITH the cost reports, if an exception to the productivity standard is necessary. We expect other MACs to follow the same protocol.

How do Telehealth visits and time factor in?

- Telehealth time does not go into the FTE calculations for minimum productivity standard calculations.
- Telehealth visits are not included in total RHC visits.
- You will carve out telehealth just like you do Lab/X-ray/EKG



Link to Novitas Productivity Standard Exception Requests:

https://www.novitas-solutions.com/webcenter/portal/MedicareJH/pagebyid?contentId=00228302&fbclid=IwAR2QwK1_mNiSx1mxFTLIQHnCtwyqKtdxvCt4JHpB4nYa7J6EfNfYuXGxbTM

Link to FCSO Productivity Standard Exception Requests:

https://medicare.fcso.com/PARD_provider_reimbursement/0462066.asp

Link to Palmetto guidance on Productivity Standard Exception Requests:

<https://www.palmettogba.com/palmetto/providers.nsf/DocsR/Providers~JJ%20Part%20A~Browse%20by%20Topic~Emergency%20and%20Disaster%20Instructions~BR9RM57524?open>

Additional information for Palmetto requests -

- For JJ providers, send the request to JJCOSTREPORT@palmettogba.com.
- For JM providers, send the request to JMCOSTREPORT@palmettogba.com.
- If you came over from Cahaba you will most likely be a JJ provider.
- If your request is due to COVID productivity/volume issues, a free form letter may be submitted. Please include the visit count that you are requesting as an exception, as well as the justification for the exception. Please indicate COVID as the reason for your request. The request can be submitted at any time.

I hope this helps!

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