

Welcome to the

RHC COVID-19 Technical Assistance Webinar

This webinar is brought to you by the National Association of Rural Health Clinics and is supported by cooperative agreement G2742182 from the Federal Office of Rural Health Policy, Health Resources and Services Administration (HRSA). It is intended to serve as a technical assistance resource based on the experience and expertise of independent consultants and guest speakers.

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Identifying Allowable Expenses for COVID-19 Programs

Moderator

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National Association of Rural
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Speaker

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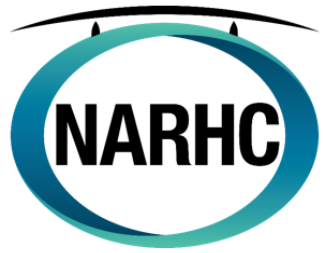
Speaker

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South Carolina Office of Rural
Health

NOSORH and Connections for
Community Care Contractor



Will this be recorded? Can I get slides?



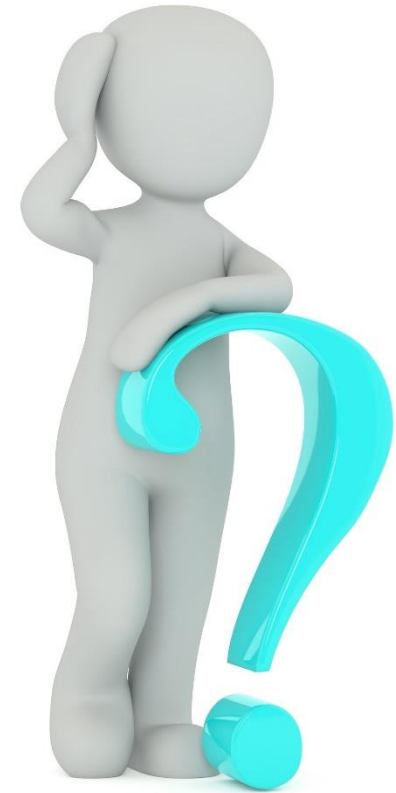
- Yes!
- All of our Technical Assistance webinar recordings, slides, and transcripts are available here:
- https://www.narhc.org/narhc/TA_Webinars1.asp
- www.NARHC.org > Resources > TA Webinars

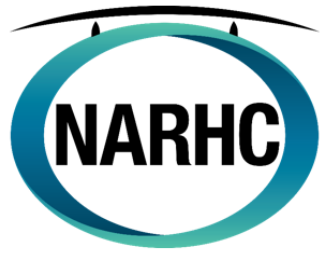


Agenda



- Brief review of RHC COVID-19 funding
- Allowable versus unavailable expenses
- Reimbursed versus unreimbursed expenses





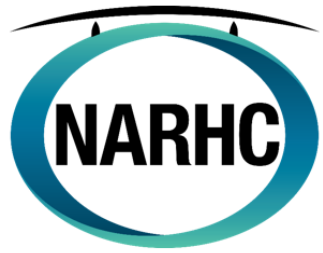
Name of Grant/Allocation	Project Period	Amount (per RHC)	Who is eligible?	Allowable Expenses and Reporting Requirements
RHC COVID-19 Testing Program	Jan. 27, 2020 – Dec. 31, 2021	\$49,461.42	All eligible Rural Health Clinics, no application necessary	COVID-19 Testing and Testing-Related RHCcovidreporting.com
Vaccine Confidence Grant Program	July 1, 2021 – June 30, 2022	\$49,529.00	1,924 RHCs applied and were funded	<ul style="list-style-type: none"> • Vaccine promotion, education, and outreach to increase confidence in ALL vaccines • Follow your approved budget or submit a request to change through EHB • Reporting requirements to be announced!





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RHC COVID-19 Testing and Mitigation Program	Jan. 1 2021 – Dec. 31, 2022	\$100,000	All eligible and reporting compliant Rural Health Clinics	COVID-19 Testing and Testing-Related COVID-19 Mitigation and Mitigation-Related RHCcovidreporting.com
Provider Relief Funding	Awarded April, May, December 2020; Phase 4 coming soon!	Varying amounts	Health care providers, including targeted allocations for rural providers	Provider Relief Fund Portal Lost revenues and unreimbursed expenses attributed to COVID-19
American Rescue Plan – Rural Allocation	Applications open September 29 th for 4 weeks	\$8.5 billion available – Rural providers must apply	Rural providers	Lost revenues and unreimbursed expenses attributed to COVID-19 HRSA Future Payments





Reporting Differences



RHCcovidreporting.com

- DOES require total COVID-19 test and positive test numbers
- DOES require monthly reporting
- IS the program reporting requirement for both RHCCT and RHCCTM
- DOES not require RHCs to enter specific expenses

Provider Relief Fund

- DOES require specific categorical expenses to be reported
- DOES require reporting that corresponds with the period received
- DOES not require RHCs to report specific use of funds in the RHCCT or RHCCTM programs

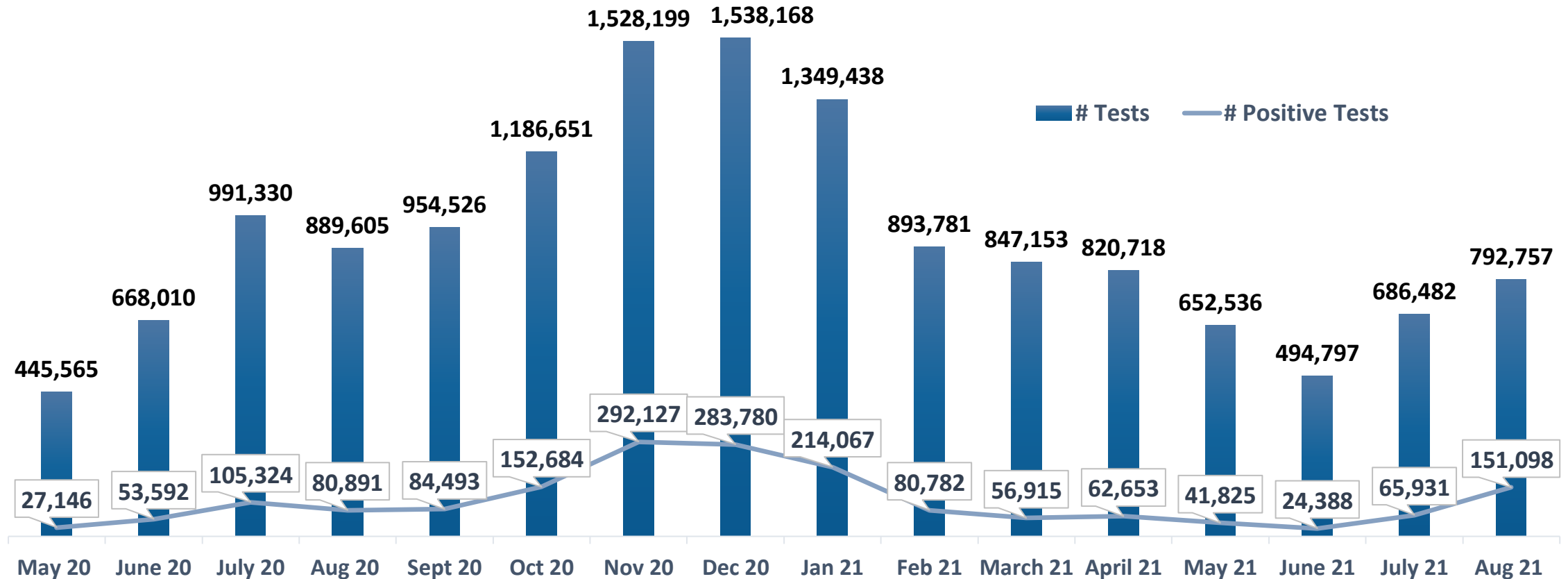
Questions? Contact
[rhccovidreporting@narhc.org!](mailto:rhccovidreporting@narhc.org)



Tests Supported by RHCCT and RHCCTM Funding



Over 14.8M COVID-19 Tests Supported





Spending RHCCT and RHCCTM Funding: 2 Important Questions



#1: Is this an “allowable expense” related to COVID-19 testing and/or mitigation?

- Testing
- Testing-Related
- Mitigation
- Mitigation-Related

#2: Am I otherwise **reimbursed** for this expense?



Allowable Expenses (RHCCT & RHCCTM)

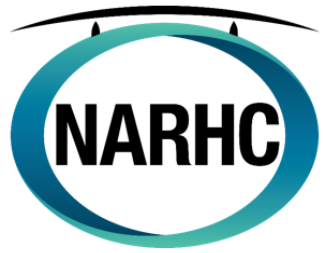


Testing:

- COVID-19 tests
 - Viral tests (including at-home tests)
 - Antibody tests

Testing-Related:

- Alterations to renovate labs and key spaces for safe/efficient testing
- Lab supplies and equipment for COVID-19 testing
- Storage (refrigerator, freezer, and storage unit safeguards)
- Personal Protective Equipment
- Workforce – staff and provider time for testing activities; retention payments to maintain adequate personnel



At-Home Tests



- At-home COVID-19 tests (i.e. home collection; direct-to-consumer; over-the-counter) are allowable expenses for RHCCT or RHCCTM program funding!
- If your RHC offers at-home test kits, your RHC should ensure the following safeguards:
 - (1) free COVID-19 testing is offered to all who request it, regardless of insurance coverage or lack thereof;
 - (2) individuals who receive positive test results should be instructed to consult with a health care professional and would not be referred/directed to the RHC or to any other specific provider as an effort to generate new patients to your RHC;
 - (3) the RHC would not offer special discounts or any other free or discounted items or services to those who received free COVID-19 testing;
 - (4) no payor, including the beneficiary, a commercial insurance company, or a Federal health care program, would be billed for or pay any costs in connection with the COVID-19 testing services; and
 - (5) the COVID-19 tests are cleared or approved by the Food and Drug Administration (FDA), are subject to an FDA-issued Emergency Use Authorization, or are covered by the Medicare program.
- **Please read and follow additional U.S. Health and Human Services Office of the Inspector General (OIG) Coronavirus Disease 2019 (COVID-19) Public Health Emergency FAQs found [here](#).**
- There are currently 13 tests that can be performed at home with a self-collected sample and 63 tests and collection kits where samples are collected at home and sent to a lab for processing that have FDA Emergency Use Authorization

Poll #1



Allowable Expenses (RHCCTM)



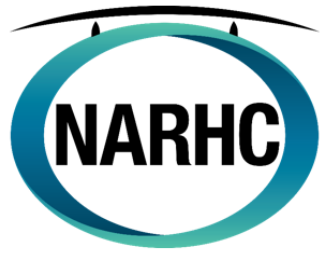
Mitigation:

- Expenses related to case investigation, contact tracing, screening, long-COVID conditions management, community education, health behavior promotion, cleaning and disinfecting, etc.

Mitigation-Related:

- Workforce costs related to mitigation activities, including costs to secure and maintain staff
- Retrofitting for mitigation and infection control
- Expanding digital technologies

Poll #2



Retrofitting versus Construction



Retrofitting (allowable):

- Upgrading HVAC and other filtration systems
- Automating doors and high-touch surfaces (bathrooms)
- Installing tents, sheds, etc. for testing and mitigation activities
- Creating negative pressure spaces

Construction (unallowable):

- Building an entirely new **permanent** building
- Significant new ground disturbance

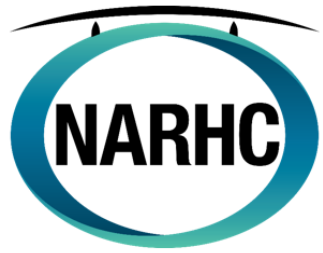


Workforce Payments



- Retention bonuses
 - When would a retention payment be most effective?
 - What is “reasonable?”
- Recruitment and hiring costs
- Housing costs
- Childcare costs

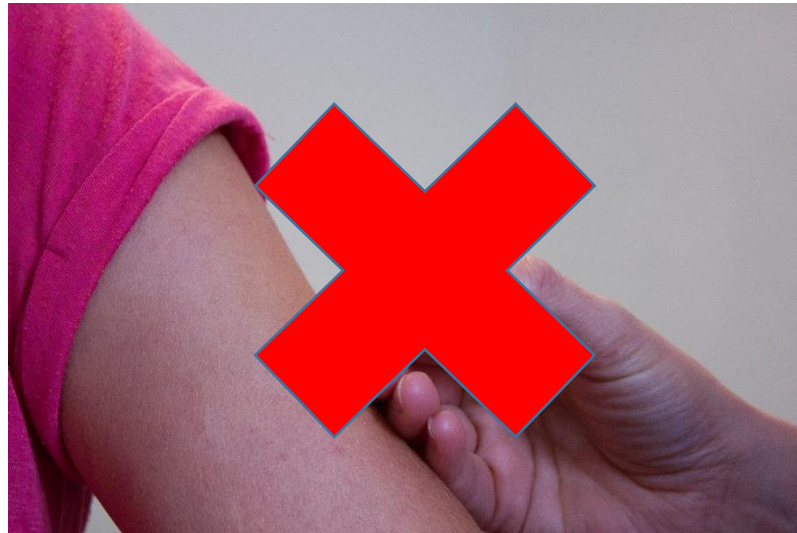




Unallowable Expenses



- Direct provider-to-patient vaccine administration
- Vaccine purchase
- Patient care or treatment





Reimbursed versus Unreimbursed



Expenses clearly **not** reimbursed by another payer:

- Retrofitting facilities to support testing or mitigation
- At-home COVID-19 tests
- Retention or recruitment payments / bonuses necessary to “secure and maintain adequate personnel” to carry out testing / mitigation activities
- Vehicle purchase and transportation costs to support mitigation efforts

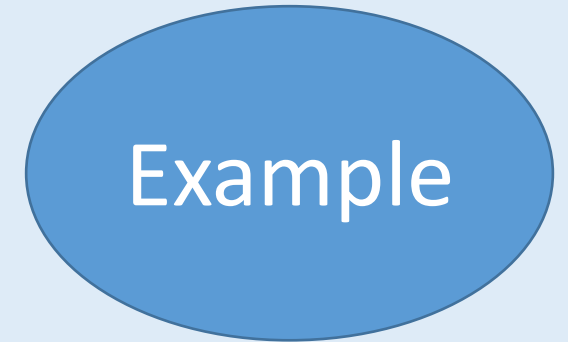




Calculating Remaining Expenses After Reimbursement (e.g. Insurance)



- **COVID-19 Testing Costs**
 - Staff Time @ 15 min per test = \$5.00
 - Utilities, office supplies, rent, accounting, etc. = \$6.00
 - Test Supplies = \$25.00
 - PPE / Infection Control = \$7.00
 - Test Equipment per 1 test performed = \$7.30
- **Total Expenses: \$50.30**
- **Reimbursement per Test (e.g. Insurance): \$38**
- **Remaining Expenses: \$12.30**



Expenses Per Test:	\$50.30
Reimbursement Per Test (Insurance):	38.00
Remaining expense per test applied to RHCCT or RHCCTM	\$12.30

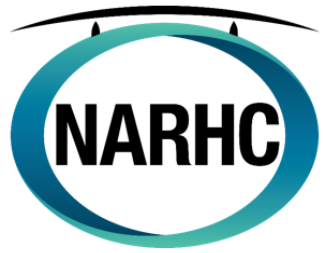


How does Medicare reimburse RHCs for COVID-19 Tests?



- Collection done at RHC; lab portion outsourced to third-party
 - Does not generate a claim
 - Allowable expense on cost report
 - May result in increased All-Inclusive Rate for the next year
 - Third-party bills lab portion
- Collection and lab portion done at RHC
 - Independent RHCs – Part B on CMS 1500
 - Provider-Based RHCs – Bill through hospital
 - Reimbursed a specific amount per test which can be used in calculation on slide 17





Questions?



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- **CEU for Certified Rural Health Clinic Professionals (CRHCP) ONLY: ZZDFU**
- **Upcoming Webinar:** Next Thursday, September 30th @ 11 AM ET Provider Relief Fund Phase 4 and ARP Rural



Thank You!

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