



Experienced Knowledge

Management Overview of RHC Cost Reporting Technical Assistance July 30, 2019









Agenda

- 1. Cost Report Overview
- 2. Building Blocks ABCs
 - 1. Expenses
 - 2. Visits
 - 3. Productivity standards
 - 4. Flu & Pnu Costs
 - 5. PS&R
 - 6. Bad Debts
- 3. Questions



Webinar Objective

To provide general information on the RHC cost reporting understandable to RHC managers and providers and focused on impact, timing, and responsibilities of the RHC to prepare timely and accurate Medicare and Medicaid cost reports.

RHC Cost Report



RHC Cost Report Overview

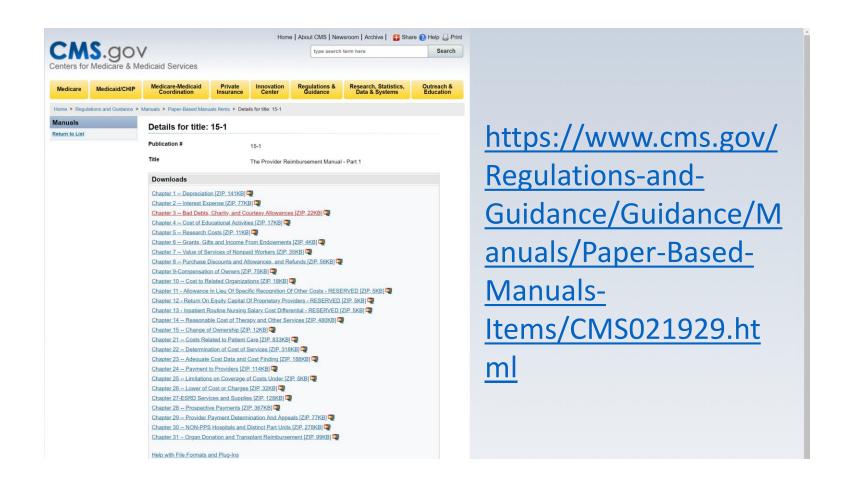
The purpose of the Medicare Cost Report is reconciling payments received from Medicare as compared to the allowable costs reported by the RHC. The process will result in a settling of monies owed or due to Medicare for the cost report fiscal year.

Medicaid uses a cost reporting process to establish Medicaid RHC rates and/or settle Medicaid RHC payments with the RHC. Each state is different.

Why is a Cost Report important?

- Medicare will not pay you if you do not file a cost report and will ask for any Medicare money paid during the year to be refunded.
- ² RHC Medicare and Medicaid rates are based upon the cost report.
- RHCs receive a cost report settlement for flu, pnu, bad debts, preventive co-pays/deductibles and rate settlements.
- You are responsible for preparing the Cost Report accurately and in compliance with Medicare and Medicaid rules.

Medicare RHC Cost Report Reimbursement Regulations



Cost Reporting Forms for Independent & Provider-based RHCs

Description	Independent	Provider-based
Cost Reporting Form	CMS-222-17	CMS-2552-10
Link to PDF of Forms	https://www.cms.gov/Regu lations-and- Guidance/Guidance/Trans mittals/2018Downloads/R1 P246.pdf	https://www.cms.gov/Regu lations-and- Guidance/Guidance/Trans mittals/Downloads/R3P240 f.pdf
Software Vendors 4 vendors for RHCs and 2 for hospital cost reports	https://med.noridianmedic are.com/web/jea/audit- reimbursement/cost- reports/cms-approved- vendor-listing	https://med.noridianmedic are.com/web/jea/audit- reimbursement/cost- reports/cms-approved- vendor-listing

Crosswalk of Forms between Provider-based & Independent RHCs

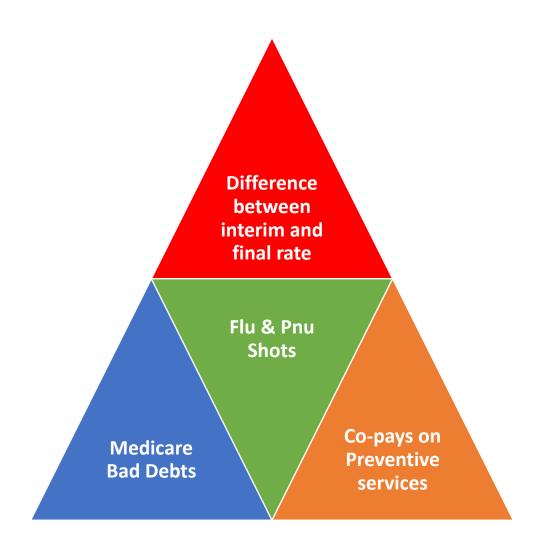
Purpose of Form	Independent	Provider-based
Provider Name, Location, CCN Number, Signature	S Parts I, II & III	S-2/S-8
Malpractice Information, Hours of Operation	S-1 Part I & II	NA
Replaces the 339 Questionnaire	S-2	NA
Payer Mix and mental health visits	S-3	NA
Expense information (Trial Balance of total expenses)	А	A/M-1
Reclassifications (Salaries to the proper cost center)	A-6	A-6
Adjustments (remove non-allowable expenses, straight- line depreciation on assets, value of services)	A-8	A-8
Related Party Transaction (adjust RPTs to actual cost)	A-8-1	A-8-1
Allocation of Overhead (Hospital or Parent)	NA	B Part I, B-1
Visits, FTEs, Overhead allocations to Non-RHC	B, Part 1	M-2
Influenza and Pneumonia Costs	B-1	M-4
All Inclusive Rate Calculation, Bad Debts, P S & R data	С	M-3
Medicare Payments including Interim settlements	C-1	M-5

RHC Cost Caps by Year

	2016	2017	2018	2019
Medicare Cap	\$81.32	\$82.30	\$83.45	\$84.70
Medicare Economic Index	1.10%	1.20%	1.40%	1.50%

Provider-based RHCs with less than 50 beds are not subject to the above caps.

What does Medicare Settle on the Cost Report?



Cost Report Repayments to Medicare

- Many of the MACs did the following:
 - Increased the interim rate above the cap
 - Paid Interim Settlements during the year.
- This resulted in the following:
 - Much smaller settlements to RHCs
 - Some RHCs paying back monies to Medicare
 - RHC Consultants having to do a lot of explaining



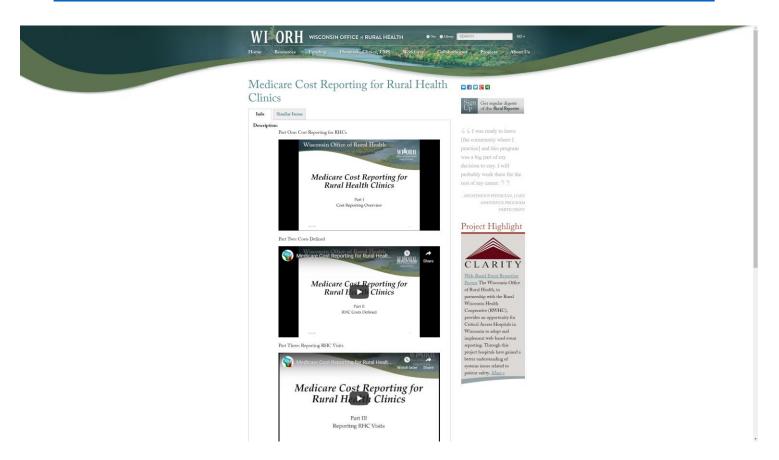
Professional Tip: Get Help

https://www.web.narhc.org/narhc/Consultants Vendors1.asp

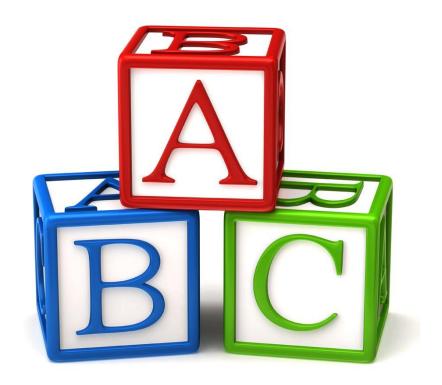
MARIC RIVER LATITUDES
ENGINE CONTROLL CONT
Montal Association of Management of Manageme

Wisconsin Office of Rural Health - Wipfli

http://worh.org/library/medicare-cost-reporting-rural-health-clinics



Building Blocks



What is a Medicare Cost Report?

Form 222 or 2552 - Medicare Cost Report is required by all RHC's to be completed on an annual basis.

If covers a 12-month period of time with some exceptions: You may have up to a 13-month cost report or you may have a short period if you sell the RHC or change ownership.

The First Major Change in the Independent RHC cost report in 25 years



The overall burden to RHCs is estimated at 55 hours compared to the existing burden associated with the CMS-222-92 of 50 hours.

New Information Requirements

Independent Rural Health Clinics will have to provide new information for their annual cost report submissions this year. The Centers for Medicare and Medicaid Services (CMS) has replaced the CMS-222-92 form with the new CMS-222-17 and replaced Chapter 29 of the Provider Reimbursement manual with Chapter 46. Instructions and forms were provided by CMS in Transmittal 1 on May 18, 2018 and the new cost report forms are required for cost report submissions ending on or after September 30, 2018. Alternatively, provider-based RHCs in a hospital healthcare complex, will continue to use Form CMS-2552-10 instead. Below is a link to the new cost report forms and instructions.

https://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/2018Downloads/R1P246.pdf

Why Change?

The reason for the changes to the independent RHC cost report are as follows:

1. To incorporate electronic filing of the cost report using the MCReF system. The following link has information on how MCReF works:

https://www.cms.gov/Medicare/Compliance-and-Audits/Part-ACost-Report-Audit-and-Reimbursement/MCReF.html

- 2. To eliminate unnecessary FQHC information due to the Form 224-14 used by FQHCs
- 3. To incorporate information previously submitted on the Form 339 Questionnaire (no longer required)

Sources – RHC Cost Reports

<u>Description</u>	<u>Link</u>
Chapter 46, RHC Instructions and Forms, May 18, 2018. (95 page PDF)	https://www.cms.gov/Regulations-and- Guidance/Guidance/Transmittals/2018Do wnloads/R1P246.pdf
Medicare Cost Report E-Filing (MCReF) MLN Matters Number: MM10611 revised November 2, 2018	https://www.cms.gov/Outreach-and- Education/Medicare-Learning-Network- MLN/MLNMattersArticles/downloads/MM10611.pdf
MCReF FAQs (5-page PDF)	https://www.cms.gov/Medicare/Compliance- and-Audits/Part-A-Cost-Report-Audit-and- Reimbursement/Downloads/MCReF-FAQ.pdf

Mandated Cost Reporting Timeframes

Description	Timeframe
Cost Report prepared by the clinic and due to Medicare	5 months year-end
Number of days the MAC has to accept the cost report	30 days
Number of days the MAC has to pay a tentative settlement	60 days
Time to final settle cost report	1 year from
	acceptance

Source: https://www.cms.gov/Regulations-and-guidance/Guidance/Manuals/downloads/fin106c08.pdf

Deadlines for 12/31/2019 Fiscal Year Ends

#	Requirement	Due Date
1.	To claim Medicare Bad Debts, the bad debt must be written off by the fiscal year end (usually 12/31)	12/31/2019
2.	Liquidate accrued bonuses or payments to owners	75 days after year-end. March 16, 2020
3.	Liquidate accruals for non-owners.	One year after year-end. December 31, 2020
4.	Complete Requested Workpapers from your Cost Report Preparer	3 months after the fiscal year end in most cases
5.	Sign up with EIDM/IACS for the P S and R.	ASAP

Gathering Information for the Cost Report

Your Cost Report Preparer will send you a checklist of information or Excel spreadsheet to submit to your cost report preparer.

Start Early and get the information to the preparer as soon as possible.

If you do not have the checklist by your cost report year-end or shortly thereafter contact your cost report preparer.



Medicare Cost Report Table of Contents

- Medicare Cost Report Form 222/2552 (ECR File)
- 2. Medicare Workpapers which include 3 through 9.
- 3. Trial Balance of expenses that ties to WKS A.
- 4. Workpapers to support reclassifications or adjustments.
- 5. How total visits were computed.
- 6. How Provider FTEs are computed
- 7. Flu and Pnu logs and invoices
- 8. P S and R including preventive services
- Medicare Bad Debt listing in Excel

All Inclusive Rate (AIR) Per Visit Calculation

Total Allowable RHC Costs minus Flu/Pnu costs

Total RHC Visits (Includes all payor types)

=

RHC Cost Per Visit (limited to cap if applicable)

Chapter 13, Section 80.4 The A/B MAC re-calculates the AIR by dividing the total allowable costs across all patient types (i.e., the numerator) by the number of visits (as defined in section 40) for all patient types (i.e., the denominator). If fewer than expected visits based on the productivity standards have been furnished, the A/B MAC substitutes the expected number of visits for the denominator and uses that instead of the actual number of visits.

Allowable Costs

"Allowable costs must be reasonable and necessary and may include practitioner compensation, overhead, equipment, space, supplies, personnel, and other costs incident to the delivery of RHC services."

- Provider Reimbursement Manual, Pub. 15

Total Expense Source Documents (Numerator)

Provide your Expenses Typically one of the following:

- 1. Financial Statements
- 2. Trial balance
- 3. Tax return

	ABC Compa	ny	
Table: Cash Flow			
Po Farea Cell Flor	10000	10000	Tel dan
23/23/2017 Th	PT.3000	PY 2010	FY 300
CIP RODUST	-0.107		- 1000
Coll. from Operations			
Corp. Names	\$694,000	\$214,060	41,000,000
Surpose Carle from Operations	E741.000	811500	41,002,00
Accepted Carll Superied			
Subset as YAT, HOT NOT Received.	30	30	7
New Current Removing	30	80	100
New Other Use Stripe Interestings	90	80	
See Long-term Link Ohes	40	100	9
Substant Omer Current Assets	100	66	,
Stries of Congrains Assets	10	90	9
Total Extendit and Phosphaid	10	30	200000
Europe Carl Reserved	EF91.000	2019.300	\$1,000,00
Experières	RY 3000	FY 2003	FV 300
Super-Environment Commons			
CHE SHARING	\$082,000	8414.380	1404.00
Bil Faccionis	1079,607	1001,400	2401.41
Editable Spann on Operations	M07-07	1716,600	Time?
Address Out Spett			
SUDHITEK, YAT, RESTIGET FIND ONC.	360	50	79
Principal Reservent of Survey Borgering	40	50	
Otter Liabilities Panyloai Repaymont	160	60	
Gargiere Listifities Principal Repayment	\$400,000	\$10,000	304.00
Purchase Orion Current Assets	S/14 000	\$16,660	521.00
Plythas Long em Asses	40	\$20,000	590,00
(h-meste	- 10	100	
Sumotor Carth Speek	PASSAGE.	\$800.KU	1005,47
Kel Cash Flora	539 340	ATTUARY	171.42
Cort Relevan	639.360	Principal.	6203.63

Source Documents for Cost Report Expenses

- For provider-based RHCs
- -Departmental summary reports
- -Internally prepared financial statements (Trial Balance)
- -Hospital cost report data
- For independent RHCs
- -Financial statements prepared by outside accountants
- -Internally prepared financial statements (Quickbooks)
- -Tax returns

Worksheet A Form 222-17 for Independent RHCs

05-18	1	FORM CMS-222-1	7				4690 (0	Cont.)
RECLASSIFICATION AND ADJUSTMENT OF TRIAL BALANCE OF EXPENSES				CCN:	PERIOD: FROM: TO:	_	WORKSHEET A	
COST CENTER	SALARIES	OTHER	TOTAL	RECLASSIFI- CATIONS	RECLASSIFIED TRIAL BALANCE	ADJUSTMENTS	NET EXPENSES FOR ALLOCATION	
FACILITY HEALTH CARE STAFF COSTS	•	-		·			,	_
1 0100 Physician								1
2 0200 Physician Assistant								2
3 0300 Nurse Practitioner								3
4 0400 Certified Nurse Midwife								4
5 0500 Registered Nurse								5
6 0600 Licensed Practical Nurse								6
/ 0700 Clinical Psychologist								/
8 0800 Clinical Social Worker								8
9 0900 Laboratory Technician								9
10 1000 Other (specify)								10
14 Subtotal-Facility Health Care Staff Costs (sum of lines 1 through 10)								14
COSTS UNDER AGREEMENT								
15 1500 Physician Services Under Agreement								15
16 1600 Physician Supervision Under Agreement								16
17 Subtotal Under Agreement (sum of lines 15 and 16)								17
OTHER HEALTH CARE COSTS								
25 2500 Medical Supplies								25
20 2600 Transportation (Health Care Staff) 27 2700 Depreciation-Medical Equipment								26
2/ 2700 Depreciation-Medical Equipment								27
28 2800 Malpractice Premiums								28
29 2900 Allowable GME Costs								29
30 3000 Pneumococcal Vaccines & Med Supplies								30
31 3100 Influenza Vaccines & Med Supplies								31
32 3200 Other (specify)								32
38 Subtotal-Other Health Care Costs (sum of lines 25 through 32) 39 Total Cost of Services (Other Than								38
Total Cost of Services (Other Than Overhead And Other RHC Services)								39
(sum of lines 14, 17, and 38)								
FACILITY OVERHEAD-FACILITY COST								—
40 4000 Rent								40
41 4100 Insurance	ļ			 			 	41
42 4200 Interest On Mortgage Or Loans	-	-	-	+			+	42
43 4300 Utilities	-		-	+			-	43
44 4400 Depreciation-Buildings And Fixtures								44
45 4500 Depreciation-Movable Equipment				 			 	45
40 4600 Housekeeping And Maintenance			 	+	+		 	46
4/ 4700 Property Tax			 	 	 		 	47
48 4800 Other (specify)				 			 	48
59 Subtotal-Facility Costs (sum of lines 40 through 48)				†				59
						ı		

Worksheet A Form 222-17 for Independent RHCs

4690 (Cont.)	1	FORM CMS-222-1	7					05-18
RECLASSIFICATION AND ADJUSTMENT OF TRIAL BALANCE OF EXPENSES				CCN:	PERIOD: FROM: TO:	-	WORKSHEET A	
COST CENTER	SALARIES	OTHER	TOTAL (col. 1 + col. 2)	RECLASSIFI- CATIONS	RECLASSIFIED TRIAL BALANCE (col. 3 ± col. 4)	ADJUSTMENTS	NET EXPENSES FOR ALLOCATION (col. 5 ± col. 6)	
FACILITY OVERHEAD-ADMINISTRATIVE COSTS	1	4	,	7	,	U	,	-
60 6000 Ottice Salaries								60
61 6100 Depreciation-Office Equipment								61
62 6200 Office Supplies					1			62
63 6300 Legal								63
64 6400 Accounting								64
05 6500 Insurance								05
66 6600 Telephone								66
67 6700 Fringe Benefits And Payroll Taxes								67
68 6800 Other (specify)								68
/3 Subtotal-Administrative Cost (sum of lines 60 through 68)								/3
74 Total Overhead (sum of lines 59 and 73)								74
COST OTHER THAN RHC SERVICES								
75 7500 Pharmacy								75
76 7600 Dental								76
77 7700 Optometry								77
78 7800 Non-allowable GME Pass Through Costs								78
79 7900 Telehealth								79
80 8000 Chronic Care Management								80
81 8100 Other (specify)								81
86 Subtotal-Cost Other Than RHC (sum of lines 75 through 81)								86
NON-REIMBURSABLE COSTS								
87 8700								87
88 8800					ļ			88
89 8900								89
90 Subtotal Non-Reimbursable Costs (sum of lines 87 through 89)					ļ			90
TOTAL COSTS (sum of lines 39, 74, 86, and 90)								100

Provider-Based RHCs Cost Report Forms – M-1

10-1	12		FOR	M CMS-2552-10				4090 (C	Cont.)
ANA	LYSIS OF PROVIDER-BASED RURAL HEALTH CLI	NIC/				PROVIDER CCN:	PERIOD:	WORKSHEET M-1	
FEDE	RALLY QUALIFIED HEALTH CENTER COSTS						FROM		
						COMPONENT CCN:	то		
Check	applicable box: [] RHC [] FQH	IC .						+	
	,					RECLASSIFIED		NET EXPENSES	T
						TRIAL		FOR	
		COMPEN-		TOTAL	RECLASS-	BALANCE		ALLOCATION	
		SATION	OTHER COSTS	(col. 1 + col. 2)	IFICATIONS	(col. 3 + col. 4)	ADJUSTMENTS	(col. 5 + col. 6)	
		1	2	3	4	5	6	7	1
	FACILITY HEALTH CARE STAFF COSTS								
1	Physician								1
2	Physician Assistant								2
3	Nurse Practitioner								3
4	Visiting Nurse								4
5	Other Nurse								5
6	Clinical Psychologist								6
7	Clinical Social Worker								7
8	Laboratory Technician								8
9	Other Facility Health Care Staff Costs								9
10	Subtotal (sum of lines 1-9)								10
	COSTS UNDER AGREEMENT								
	Physician Services Under Agreement								11
	Physician Supervision Under Agreement								12
	Other Costs Under Agreement								13
14	Subtotal (sum of lines 11-13)								14
	OTHER HEALTH CARE COSTS								-
	Medical Supplies								15
	Transportation (Health Care Staff)								16
	Depreciation-Medical Equipment								17
	Professional Liability Insurance								18
19	Other Health Care Costs								19
	Allowable GME Costs								20
	Subtotal (sum of lines 15-20)						ļ		21
22							1		22
	(sum of lines 10, 14, and 21) COSTS OTHER THAN RHC/FQHC SERVICES								┿
22	Pharmacy								23
24								 	24
25	Optometry								25
	All other nonreimbursable costs								26
	Nonallowable GME costs							 	27
	Total Nonreimbursable Costs (sum of lines 23-27)							 	28
	FACILITY OVERHEAD								-20
29	Facility Costs								29
30	Administrative Costs							+	30
	Total Facility Overhead (sum of lines 29 and 30)							+	31
	Total facility costs (sum of lines 22, 28 and 31)							+	32
	Toma anciary costs (sum or mies 22, 20 diff 31)					l			32

The net expenses for cost allocation on Worksheet A for the RHC/FQHC cost center line must equal the total facility costs in column 7, line 32 of this worksheet.

FORM CMS-2552-10 (10-2012) (INSTRUCTIONS FOR THIS WORKSHEET ARE PUBLISHED IN CMS PUB. 15-2, SECTION 4066)

Rev. 3

40-659

Worksheet B-1 Provider-based RHC Cost Statistics

Provider-based RHCs receive an allocation of parent overhead from the hospital. The provider-based RHC must maintain statistics to support the allocation of overhead. Such statistics may include:

- 1. Square Footage
- Time Studies
- 3. Gross Salaries
- 4. Accumulated Costs
- 5. Pounds of Laundry

	0 (Cont.) FALLOCATION - STATISTICAL BASIS	10	RM CMS-255	PROVIDER CCN:		PERIOD:		WORKSHEET B-1	10-12
COSI	ALLOCATION - STATISTICAL BASIS			PROVIDER CCN:		FROM	_	WORKSHEET B-1	
		CAPITAL RE	LATED COST			ADMINIS-	MAIN-		т
		BLDGS. & FIXTURES	MOVABLE EQUIPMENT	EMPLOYEE BENEFITS		TRATIVE & GENERAL	TENANCE & REPAIRS	OPERATION OF PLANT	
	COST CENTER DESCRIPTIONS	(SQUARE FEET)	(DOLLAR VALUE)	(GROSS SALARIES) 4	RECONCIL- IATION 5A	(ACCUM. COST)	(SQUARE FEET) 6	(SQUARE FEET)	1
	ANCILLARY SERVICE COST CENTERS		-	7	- A			,	
50	Operating Room								- 51
51	Recovery Room								5
	Labor Room and Delivery Room							1	5
	Anesthesiology								5
	Radiology-Diagnostic							1	5
	Radiology-Therapeutic								5
	Radioisotope								5
	Computed Tomography (CT) Scan								5
	Magnetic Resonance Imaging (MRI)								5
59	Cardiac Catheterization								5
60	Laboratory								6
61	PBP Clinical Laboratory Services-Program Only								6
62	Whole Blood & Packed Red Blood Cells								6
63	Blood Storing, Processing, & Trans.								6
64	Intravenous Therapy								6
65	Respiratory Therapy								6
66	Physical Therapy								6
67	Occupational Therapy								6
68	Speech Pathology								6
	Electrocardiology								6
70	Electroencephalography								7
71	Medical Supplies Charged to Patients								7
	Implantable Devices Charged to Patients								7
	Drugs Charged to Patients								7
	Renal Dialysis								7
	ASC (Non-Distinct Part)								7
76	Other Ancillary (specify)								7
	OUTPATIENT SERVICE COST CENTERS								
	Rural Health Clinic (RHC)								8
									8
	Clinic								9
	Emergency								9
	Observation Beds								9:
93	Other Outpatient Service (specify)								93

FORM CMS-2552-10 (10-2012) (INSTRUCTIONS FOR THIS WORKSHEET ARE PUBLISHED IN CMS PUB. 15-2, SECTION 4020)

40-55

Rev. 3

Using Benchmark Data

What elements of cost are causing the variance: provider, support staff, overhead, parent allocation?

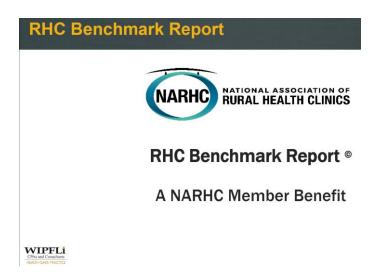
	2018							
	RHC		Mean					
Category/Indicator	Values	MI	Midwest	Nation				
Number of Facilities	1	61	383	837				
Clinic Cost per Encounter:								
Total Health Care Staff	130.04	79.09	98.42	92.91				
Total Direct Costs of Medical Services	146.41	123.21	129.20	117.97				
Allowable GME Overhead	0.00	0.00	0.00	0.00				
Clinic Overhead	59.88	27.57	22.73	24.09				
Parent Provider Overhead Allocated	122.44	81.28	81.91	78.20				
Allowable Overhead (Clinic and Parent)	182.32	108.34	104.07	101.54				
Allowable Overhead Ratio (Clinic and Parent)	100%	100%	99%	99%				
Total Allowable Cost per Actual Encounter	328.74	230.60	233.00	218.67				
Total Allowable Cost per Adjusted Encounter	328.74	221.89	222.99	208.51				



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Professional Tip: Benchmark your Cost Report

https://www.wipfli.com/healthcare



https://www.ruralhealthinfo.org/assets/762-2349/slides-121415.pdf



	1	2015	I		001/			0017	
	2015			2016		2017			
	TN	Mean		TN	Mean		Mean		Mari
Category/Indicator	TN	Southern	Nation	TN	Southern	Nation	TN	Southern	Nation
Number of Facilities	62	708	1,242	71	672	1,154	74	628	1,056
Encounters per FTE:									
Physicians	5,209	4,970	4,729	5,167	4,941	4,651	4,577	4,725	4,577
Physician Assistants	3,435	3,677	3,639	3,574	3,834	3,740	2,967	3,911	3,738
Nurse Practitioners	3,215	3,487	3,327	3,267	3,497	3,332	3,242	3,469	3,286
Visiting Nurses	0	119	375	0	200	525	595	538	815
Clinical Psychologist/Social Worker	980	1,658	1,876	1,620	1,356	1,478	1,140	1,643	1,746
Midlevel Staffing Ratio	80%	55%	54%	80%	57%	57%	81%	59%	58%
Midlevel Visit Ratio	72%	46%	46%	72%	49%	49%	74%	52%	51%
Cost per Encounter:									
Physician	56.84	55.83	59.10	63.93	58.88	62.04	69.22	62.80	64.96
Physician Assistant	36.38	33.84	33.82	31.04	31.25	33.06	36.05	31.91	34.63
Nurse Practitioner	32.81	32.05	34.37	34.54	33.23	35.19	34.45	34.21	37.09
Visiting Nurse	#DIV/0!	313.49	97.39	0.00	263.49	103.50	117.07	111.29	69.26
Clinical Psychologist/Social Worker	165.53	89.32	52.67	96.58	92.61	69.71	53.73	72.72	55.53
Total Health Care Staff Cost	11.47	12.51	14.19	10.78	12.78	14.74	11.17	13.34	15.23
Cost per FTE:									
Physician	264,333	266,709	269,434	306,012	279,334	276,635	292,911	290,846	288,698
Physician Asstistant	124,961	124,427	123,069	110,934	119,809	123,661	106,947	124,798	129,446
Nurse Practitioner	105,480	111,750	114,345	112,868	116,211	117,254	111,682	118,694	121,874
Visiting Nurse	28,001	37,413	36,524	0	52,791	54,352	69,655	59,818	56,466
Clinical Psychologist/Social Worker	162,220	148,073	98,810	156,460	125,626	103,017	61,251	119,484	96,944
Total Healthcare Staff Costs per Provider FTE	42,539	52,546	57,439	40,642	53,339	58,968	39,858	54,220	59,977
Clinic Cost per Encounter:									
Total Health Care Staff	51.69	57.24	61.57	53.60	58.35	62.87	55.26	61.28	65.82
Total Direct Costs of Medical Services	63.14	67.38	72.52	66.27	68.57	74.17	69.76	71.36	76.99
Facility Cost	13.89	9.59	10.19	11.96	9.69	11.10	12.23	9.70	11.17
Clinic Overhead	58.49	47.41	54.20	55.36	48.54	58.44	57.95	48.90	59.63
Allowable Overhead	54.16	43.97	47.63	50.77	44.96	49.02	54.90	45.65	50.02
Allowable Overhead Ratio	93%	93%	88%	92%	93%	84%	95%	93%	84%
Total Allowable Cost per Actual Encounter	117.30	111.02	119.97	117.04	113.51	123.18	124.66	116.60	126.77
Total Allowable Cost per Adjusted Encounter	113.26	108.92	116.96	113.58	111.25	119.82	119.42	114.12	123.30
Cost of Vaccines and Administration per									
Adjusted Encounter (Reimbursed Separately)	(2.65)	(2.62)	(3.47)	(2.73)	(2.89)	(3.99)	(2.01)	(3.24)	(4.13)
Payment Rate per Adjusted Encounter	110.61	106.30	113.49	110.85	108.36	115.83	117.41	110.88	119.17
Total Encounters	469,666	8,501,938	15,452,512	558,284	8,198,077	14,340,172	592,558	7,780,195	13,469,393
Total Medicare Encounters	75,336	2,029,889	3,634,757	83,802	1,846,994	3,210,685	92,153	1,648,929	2,895,111
Medicare Percent of Visits	16%	24%	24%	15%	23%	22%	16%	21%	21%
Injection Cost:									
Cost per Pneumococcal Injection	220.94	173.43	188.83	282.22	201.14	229.88	274.63	245.80	270.32
Cost per Influenza Injection	44.09	48.89	49.13	43.52	48.15	51.14	54.66	68.29	66.41



New Cost Centers – Independent RHCs

The new Form CMS-222-17 expands the number of cost centers and add specific cost centers for costs such as:

- a. Pneumococcal vaccines (CR 30) Must be entered here or you will not get paid.
- b. Influenza vaccines (CR 31) Same Here.
- c. Telehealth (CR 79)
- d. Chronic Care Management (CR 80)

Form 222–17 Cost Center Conversion Cheat sheet

Cost Report Conversion from Form 222-92 to Form 222-17 Trial Balance Cheat Sheet

Cost Report Trial Balance Cod	ling for Cost Centers	
Account Type	Form 222-92 (Old)	Form 222-17 (New)
Health Care Staff: Physician	1	1
Health Care Staff: Physician Assistant	2	2
Health Care Staff: Nurse Practitioner	3	3
Health Care Staff: Certified Nurse Midwife		4
Health Care Staff: Visiting Nurse	4	5 (RN) and 6 (LPN)
Health Care Staff: Other Nurse	5	10
Health Care Staff: Clinical Psychologist	6	7
Health Care Staff: Social Worker	7	8
Health Care Staff: Laboratory Technician	8	9
Health Care Staff: Transcription	9	10.01
Health Care Staff: Contract Labor	10	10.02
Costs Under Agreement: Physician Services	13	15
Costs Under Agreement: Physician Supervision	14	16
Other Health Care: Medical Supplies	17	25
Other Health Care: Transportation	18	26
Other Health Care: Depreciation (Medical Equipment)	19	27
Other Health Care: Professional Liability Insurance	20	28
Other Health Care: Allowable GME	20.50	29
Other Health Care: Pnuemococcal Vaccine & Med Supplies		30
Other Health Care: Influenza Vaccine & Med Supplies		31
Other Health Care: Other Health Care Costs (Specify)	21	
Other Health Care: CME, Dues, Licenses, Subscritions	22	32
Other Health Care: Electronic Health Records	23	32.01
Other Health Care: Small Equipment		32.02
Facility Overhead: Rent	26	40
Facility Overhead: Insurance	27	41
Facility Overhead: Interest	28	42
Facility Overhead: Utilities	29	43
Facility Overhead: Depreciataion (Building & Fixtures)	30	44
Facility Overhead: Depreciataion (Equipment)	31	45
Facility Overhead: Housekeeping & Maintenance	32	46
Facility Overhead: Property Tax	33	47
Facility Overhead: Other Overhead Facility Costs (Specify)	34	
Facility Overhead: Other Overhead Facility Costs (Specify)	35	
Facility Overhead: Other Overhead Facility Costs (Specify)	36	
Facility Overhead (Administrative): Office Salaries	38	60
Facility Overhead (Administrative): Depreciation (Office Equipment)	39	61
Facility Overhead (Administrative): Office Supplies	40	62
Facility Overhead (Administrative): Legal	41	63
Facility Overhead (Administrative): Accounting	42	64
Facility Overhead (Administrative): Insurance	43	65
Facility Overhead (Administrative): Telephone	44	66
Facility Overhead (Administrative): Fringe Benefits & Payroll Taxes	45	67
Facility Overhead (Administrative): Billing Service	46	68
Facility Overhead (Administrative): Miscellaneous	47	68.01
Facility Overhead (Administrative): Non-Allowable Costs	48	68.02
Facility Overhead (Administrative): Corporate Administrative Allocation		68.03
Costs Other than RHC: Pharmacy	51	75
Costs Other than RHC: Dental	52	76
Costs Other than RHC: Optometry	53	77
Costs Other than RHC: Non-Allowable GME Pass Through Costs	53.50	78
Costs Other than RHC: EPSDT/Physicals	54	81
Costs Other than RHC: Hospital	55	81.01
Costs Other than RHC: Chronic Care Management	55.50	80
Costs Other than RHC: Telehealth	55.60	79
Costs Other than RHC: Private Practice	56	81.02
Costs Other than RHC: Laboratory		81.03
Costs Other than RHC: Radiology		81.04

RHC Cost Report can be divided in 3 sections

CR Description- WKS A	CR Line	_	_
Healthcare Staff Costs	1-39	4	
Facility Overhead	40-74	4	
Non-RHC and Non-Reimbursable	75-100		

Healthcare Costs – CR Lines 1-39

		COST CENTER	SALARIES 1	OTHER 2
ACIL		ALTH CARE STAFF COSTS		
1_	0100	Physician		
2	0200	Physician Assistant		
3		Nurse Practitioner		
4		Certified Nurse Midwife		
)	0500	Registered Nurse		
0	0600	Licensed Practical Nurse		
7	0700	Clinical Psychologist		
8		Clinical Social Worker		
9		Laboratory Technician		
		Other (specify)		
14		Subtotal-Facility Health Care Staff Costs (sum of lines 1 through 10)		
		R AGREEMENT		
15		Physician Services Under Agreement		
16	1600	Physician Supervision Under Agreement		
17		Subtotal Under Agreement (sum of lines 15 and 16)		
THE		TH CARE COSTS		
25	2500	Medical Supplies		
26	2600	Transportation (Health Care Staff)		
27		Depreciation-Medical Equipment		
28		Malpractice Premiums		
29		Allowable GME Costs		
50	3000	Pneumococcal Vaccines & Med Supplies		
31		Influenza Vaccines & Med Supplies		
32	3200	Other (specify)		
38		Subtotal-Other Health Care Costs (sum of lines 25 through 32)		
39		Total Cost of Services (Other Than		
		Overhead And Other RHC Services)		
		(sum of lines 14, 17, and 38)		

Facility Overhead CR Lines 40-74

FACIL	ITY OV	ERHEAD-FACILITY COST
40	4000	Rent
41	4100	Insurance
42	4200	Interest On Mortgage Or Loans
4.5	4300	Utilities
44	4400	Depreciation-Buildings And Fixtures
45	4500	Depreciation-Movable Equipment
46	4600	Housekeeping And Maintenance
47	4700	Property Tax
48	4800	Other (specify)
59		Subtotal-Facility Costs (sum of lines 40 through 48)
FACIL	ITY OV	ERHEAD-ADMINISTRATIVE COSTS
60	6000	Office Salaries
61	6100	Depreciation-Office Equipment
62	6200	Office Supplies
0.5	6300	Legal
04	6400	Accounting
65	6500	Insurance
66	6600	Telephone
67	6700	Fringe Benefits And Payroll Taxes
68	6800	Other (specify)
73		Subtotal-Administrative Cost (sum of lines 60 through 68)
74		Total Overhead (sum of lines 59 and 73)

Non-allowable Expenses CR 75-100

COST	OTHER	CTHAN RHC SERVICES
75	7500	Pharmacy
76	7600	Dental
77	7700	Optometry
78	7800	Non-allowable GME Pass Through Costs
79	7900	Telehealth
80	8000	Chronic Care Management
81	8100	Other (specify)
86		Subtotal-Cost Other Than RHC (sum of lines 75 through 81)
	KEIMB(URSABLE COSTS
87	8700	
88	8800	
89	8900	
90		Subtotal Non-Reimbursable Costs (sum of lines 87 through 89)
100		TOTAL COSTS (sum of lines 39, 74, 86, and 90)

Separate General Ledger accounts for **Non-allowable Expenses**

Certain Non-RHC expenses need separate accounting or general ledger accounts.

- A. Laboratory supplies/reagents/licenses
- B. Radiology supplies/ film/ licenses
- C. EKGs tracing supplies or Part B technical component costs.
- D. Any service billed to Part B and there is a supply cost.
- E. Chronic Care Management
- F. Tele-Health

Why are Visits so Important?

Visits are important because They are the denominator in The cost per visit calculation.

Do not count 99211 visits, Injections, lab procedures, hospital visits, non-rhc visits



Definition of an RHC Visit per Section 40 of Chapter 13 of the Medicare Benefits Policy Manual

An RHC visit is a medically-necessary medical or mental health visit, or a qualified preventive health visit. The visit must be a face-to-face (one-on-one) encounter between the patient and a physician, NP, PA, CNM, CP, or a CSW during which time one or more RHC services are rendered. A Transitional Care Management (TCM) service can also be an RHC visit. Services furnished must be within the practitioner's state scope of practice, and only services that require the skill level of the RHC or practitioner are considered RHC visits.

Total Visit Counts

2	PROVIDE AT LEAST ONE OF THE FOLLOWING (A. OR B.) TO DETERMINE
	THE TOTAL PATIENT VISITS OR
	ENCOUNTERS AND NEED ONE OF THE
	FOLLOWING.
a.	CPT Frequency report by Provider from your computer system.
b.	Written or manual visit count with physician, physician assistant, and nurse practitioner visits provided.

Additional Information Required for Independent RHCs Only

To capture additional information from the RHC such as:

- a. Malpractice premiums, paid losses, and self-insurance
- b. Medical visits, mental health visits, and visits by interns and residents
- c. Visits by payor mix (Worksheet S-3)
 - a. i. Title V- CHIP
 - b. ii. Title XVIII Medicare
 - c. iii. Title XIX Medicaid
 - d. iv. Other Commercial, self-pay, etc.

Additional Visit Information for Independent RHCs Only

TAB 2

Worksheet S-3 – Total Visits by Payor Mix

Please provide the RHC Total Visits as follows. If the clinic does not provide mental health visits or visits by interns and residents, you do not have to complete this form.

#	Description	CHIP	Medicare	Medicaid	Other	Total
1	Medical Visits					
2	Total Medical Visits					
3	Mental Health Visits					
4	Total Mental Health					
	Visits					
5	Number of Visits					
	Performed by Interns					
	and Residents					
6	Total Number of					
	Visits Performed by					
	Interns and Residents					
7	Total Visits					

Health Care Provider FTEs

Cost report requires separation of provider visits, time, (and cost):

Physician
Physician Assistant
Nurse Practitioner
Visiting Nurse
Clinical Psychologist
Clinical Social Worker



The Provider FTE calculation is important For Productivity Calculations (based up a 2,080 Hour work year)

Provider	Visits
Physician	4,200
Physician Assistant	2,100
Nurse Practitioner	2,100

Productivity Standards Documentation – FTE Calculations

Record provider FTE for clinic time only (this includes charting time):

- -Time spent in the clinic
- -Time with SNF patients
- -Time with swing bed patients

Do not include non-clinic time in provider productivity:

- -Hospital time (inpatient or outpatient)
- -Administrative time
- -Committee time

Provider time for visits by physicians under agreement who do not furnish services to patients on a regular ongoing basis in the RHC are not subject to productivity standards.

Time Studies for Provider FTEs

				Rural Health Cl	inic Physi	cian Time Stu	dy			
	Physici	an Name:					_	Date:		_
	Physici	an Signature	:							
	To com	plete, place a	an "X" in the	appropriate box	for each 1	5-minute incr	eme	nt to identify the	ac	tivities performed.
			Part A	- Provider Comp	onent			RHC	Co	mponent
		Supervision	Committee	Administration of Department	Quality Control	Emergency Room Availability		Patient Services		Documentation
0:00	0:15									
0:15									\vdash	
0:30										
0:45										
1:00	1:15									
1:15	1:30									
1:30										
1:45										
2:00	2:15									

Influenza and Pneumoccoal

4	PROVIDE ALL OF THE FOLLOWING INFORMATION TO CLAIM INFLUENZA AND PNEUMOCCOCAL REIMBURSEMENT ON THE COST REPORT.
a.	Medicare logs with patient name & HIC number and date of service for pneumoccocal and influenza patients.
b.	A count, listing, or log on non-Medicare patients in order for us to determine total flu shots provided.
C.	Invoices supporting influenza and pneumoccocal purchases during the year. This will help us to determine the cost of the supply cost.

Influenza and Pnemoccocal Shot Logs

Patient Name	HIC Number	Date of Service
John Smith	411992345A	12/31/2013
Steve Jones	234123903A	12/31/2013
Ashley Taylor	903214934A	12/31/2013

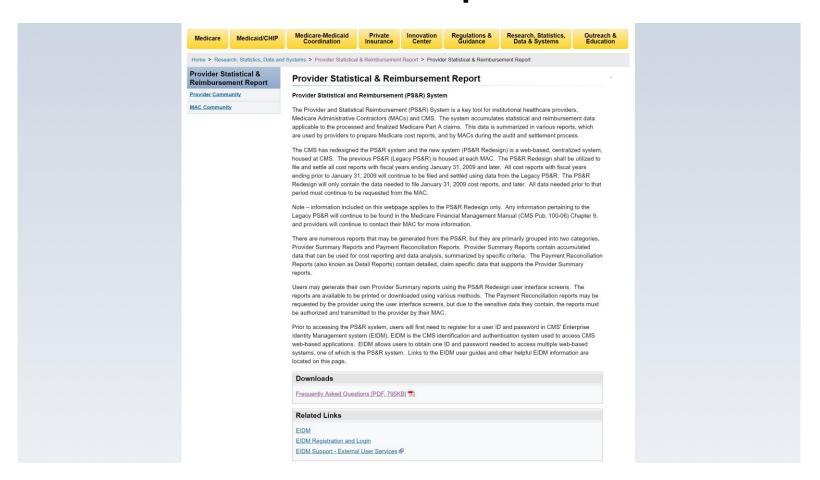
Medicare Influenza and Medicare Pnemoccocal shots should be maintained on separate logs. Pnumo pays around \$270 per shot and influenza is \$66 or so.

EIDM Access - P S and R

Start here first. This takes the longest and is the most confusing.



PS&R Reports



https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/PSRR/index.html

EIDM: Change Password FAQ

Q: How do I change my SPOT/EIDM password, and how often do I need to change it?

A: You must log in to the EIDM portal once every 60 days to change your password. You may change your Password as well as personal information associated with your Enterprise Identity Management (EIDM) account through the My Profile menu on the EIDM website.

Change Password

1. Navigate to CMS' EIDM portal: https://portal.cms.gov

Important: Keep a written record of the log-in and Passwords in the RHC Policy and Procedure Manual at all times since the EIDM Security Officials may change. You will need to access the system to print the PS and R and you will need to change the password every 60 days.

Important – Ask for Preventive Charge Report Report Type: 710 and 71S (Summary) not Detailed

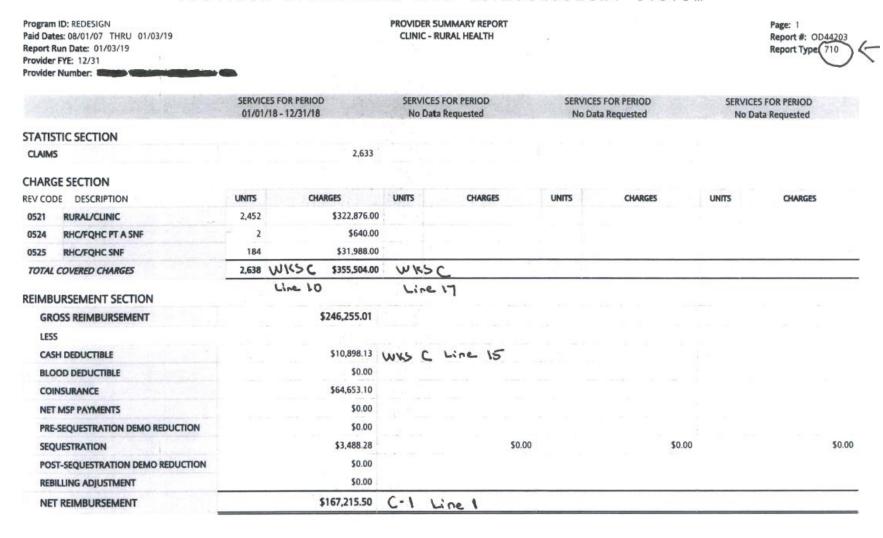
Ask for the P S and R report that has preventive charges on it.

It is a separate report from the P S and R.

It is important to enter these charges as this is were you get your co-pays paid.

PS&R Reports – 710 Visits, Charges, Deductibles, Payments

PROVIDER STATISTICAL AND REIMBURSEMENT SYSTEM



PS&R Reports – 71S Preventive Visits, Charges, Payments

PROVIDER STATISTICAL AND REIMBURSEMENT SYSTEM Program ID: REDESIGN PROVIDER SUMMARY REPORT Page: 1 Paid Dates: 08/01/07 THRU 01/03/19 CLINIC - RURAL HEALTH - PREVENTIVE SERVICES Report #: OD44203 Report Run Date: 01/03/19 Report Type: 715 Provider FYE: 12/31 Provider Number: 448966 Mid-South Convenient Care SERVICES FOR PERIOD SERVICES FOR PERIOD SERVICES FOR PERIOD SERVICES FOR PERIOD 01/01/18 - 12/31/18 No Data Requested No Data Requested No Data Requested STATISTIC SECTION CLAIMS 1,079 **CHARGE SECTION** REV CODE DESCRIPTION UNITS CHARGES UNITS CHARGES UNITS CHARGES UNITS CHARGES 0521 RURAL/CLINIC 920 \$98,656.00 TOTAL COVERED CHARGES WKSC \$98,656.00 Line 10 REIMBURSEMENT SECTION **GROSS REIMBURSEMENT** \$76,774.00 LESS **CASH DEDUCTIBLE** \$0.00 **BLOOD DEDUCTIBLE** \$0.00 COINSURANCE \$0.00 **NET MSP PAYMENTS** \$0.00 PRE-SEQUESTRATION DEMO REDUCTION \$0.00 **SEQUESTRATION** \$1,533.06 \$0.00 \$0.00 \$0.00 POST-SEQUESTRATION DEMO REDUCTION \$0.00 REBILLING ADJUSTMENT \$0.00 **NET REIMBURSEMENT** \$75,240.94 Line C-1 ADDITIONAL INFORMATION SECTION **CLAIM INTEREST PAYMENTS** \$0.20

Interim Payments to be reported on the Cost Report

Subject: YEAR END RATE REVIEW FOR FYE: December 31, 2018 FCR:

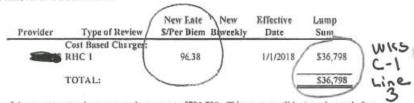
CCN: NP:

We have recently completed your Year End rate review for the war ending December 31, 2018. These reviews were

We have recently completed your Year End rate review for the year ending December 31, 2018. These reviews were based on previous audit history for your facility, the provider statistical and reimbursement report and the December 31, 2017 as-filed cost report.

As required by law, President Obama issued a sequestration order on March 1, 2013 requiring across-the-board reductions in Federal spending. In general, Medicare FFS claims with dates-of-service or dates-of-discharge on or after April 1, 2013, will incur a 2 percent reduction in Medicare payments. Therefore, to prevent making overpayments, interim and pass-through payments related to the Medicare cost report will be reduced by 2 percent. Beginning April 1, 2013 the 2 percent reduction will be applied to Periodic Interim Payments (PIP), Critical Access Hospital (CAH) and Cancer Hospital interim payments, and pass-through payments for Graduate Medical Education, Organ Acquisition, and Medicare Bad Debts.

The results of these reviews are as follows:



The net result of these reviews is a lump sum underpayment of \$36,798. This amount will be issued on or before October 19, 2018. Enclosed are the computations and payment schedule(s) for your reviews.

If you have any questions please call me at (803) 763-1392 or 4-mail me at brenda, williams@palmettogba cont.

Bronda Williama

Brenda Williams

Accountant II, Provider Reimbursement

Provider Reimbursement

Medicare Bad Debt Reimbursement is 65% of the uncollected of Medicare Co-pays and Deductibles



https://www.alabamapublichealth.gov/ruralhealth/assets/webinar.medicarebaddebt.12.10.13.pdf

Medicare Bad Debt Summary

A provider's bad debts resulting from Medicare *deductible and coinsurance* amounts that are uncollectible from Medicare beneficiaries are considered in the program's calculation of reimbursement to the provider if they meet the criteria specified in 42 CFR 413.89.

Per 42 CFR 413.89(e), a bad debt must meet the following criteria to be allowable:

- 1. The debt must be related to covered services and derived from deductible and coinsurance amounts.
- 2. The provider must be able to establish that reasonable collection efforts were made.
- 3. The debt was actually uncollectible when claimed as worthless.
- 4. Sound business judgment established that there was no likelihood of recovery at any time in the future.

https://med.noridianmedicare.com/web/jea/audit-reimbursement/audit/bad-debt

Medicare-Medicaid Crossover Bad Debt Classification

Providers claiming Medicare bad debt must meet 42 CFR 413.89 and all requirements from Chapter 3 of the Provider Reimbursement Manual (https://go.usa.gov/xEuwD). Correctly classify unpaid deductible and coinsurance amounts for Medicare-Medicaid crossover claims in your accounting records. For bad debt amounts:

- Do not write off to a contractual allowance account
- Charge to an expense account for uncollectible accounts (bad debt)

Effective for cost reporting periods beginning on or after October 1, 2019, providers must comply with these longstanding Medicare bad debt requirements.

Medicare Bad Debt Summary

- 1. Medicare coinsurance 20% of charges.
- 2. Medicare deductible of \$185.00 in 2019.
- 3. Billed to the Part A MAC.
- 4. Nothing else is allowed.
- 5. Must try to collect for 120 days from first bill.
- 6. Must treat everyone the same.
- 7. Do not have to turn over to collection agency.
- 8. Must be written off in the fiscal year of the cost report.
- 9. Collection efforts must cease.

Medicare Bad Debt Listing - Write off

Medicare Bad Debts must be written off by the end of the fiscal year to be claimed on the cost report.



Collection efforts must cease.

A Medicare Bad Debt must meet the following Criteria:

- 1. The debt must be related to a covered service and derived from the Deductible and Coinsurance amounts.
 - A. No Fee for Service. IE. Hospital, Technical Components.
 - B. No Medicare Advantage plans.
- 2. The provider must be able to establish that reasonable collection efforts were made.
 - A. At least 120 days of first bill.
 - B. First Bill as least within 45 to 60 days of service.
 - C. Four documented collection efforts made.
- 3. The debt was actually uncollectible when claimed as worthless.
- 4. Sound business judgment indicated there was little likelihood of recovery in the future.

Source: 42 CFR 413.89(e)

Capturing the information for Bad Debt

- 1.Use an Excel Spreadsheet
- 2. Keep Regular and Crossover Bad Debt in separate spreadsheets
- 3. Provide Medicare with the spreadsheet.
- 4. Start early. Start NOW.
- 5. Provide it to the Preparer ASAP.

Exhibit 2 Listing of Medicare Bad Debts and Appropriate Supporting Data

Provider	Prepared By	
Prov. Number	Date Prepared	
FYE	Inpatient	Outpatient
	SNF	RHC

(1) Patient Name	HIC NO.	(3) Dates of Service From To		(4) Indigency & Wel. Recip (ck if apply) Yes Medicaid #		(5) Date First Bill Sent To Beneficiary	(6) Date Collection Efforts Ceased	(7) Medicare Remittance Advice Date	(8) Deduct	(9) Co-Ins	(10) Total
											-
											-
											-
											-
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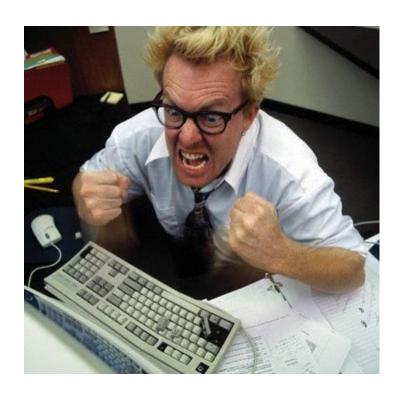
Crossover or Duel Eligible Bad Debt

•If Medicaid does not pay the complete coinsurance or deductible; a RHC can include this difference as an allowable bad debt on the cost report and Medicare will reimburse you for this bad debt. Keep up with in a separate file.

Bad Debt – Excel Spreadsheets

<u>Description</u>	<u>Link</u>				
Bad Debt Policy for Medicare Cost Report and Policy and Procedure Manuals	https://www.dropbox.com/s/0xjrovoh y5q6532/2016%20Sample%20Bad%2 0Debt%20Policy%20for%20Rural%20 Health%20Clinics.pdf?dl=0				
Medicare Bad Debt Log in Excel	https://www.dropbox.com/s/1o6zh90uxhhxmzd/ 2016%20Medicare%20Bad%20Debt%20Excel%2 0Spreadsheet%20for%20Medicare%20Only%20i n%20September%202016.xls?dl=0				
Medicare/Medicaid Crossover Bad Debt Log in Excel	https://www.dropbox.com/s/auf8w5dsu49q1v5/2 016%20Medicare%20Bad%20Debt%20Excel%20 Spreadsheet%20for%20Medicare%20and%20Me dicaid%20Crossovers%20in%20September%2C %202016.xls?dl=0				

Electronic Filing of Cost Reports



Electronic Filing of RHC Cost Reports

Currently 50,000 cost reports claiming \$200 billion of Medicare funds are filed annually to 12 different MACs

Effective July 2, 2018 Cost Reports may be filed by the following methods:

- 1. Via mail or express delivery services
- 2. Via MCReF portal in the EDIM system

Electronic filing is not Required

Electronic Filing Details

MCReF – a new application allows you to electronically transmit (e-File) your Medicare Cost Report

- Available as of 5/1/2018
- Usage is optional. Mail and hand-delivery remain filing options.
- Accessible by your EIDM (Enterprise Identity Management System) PS&R Security Official (SO) and Backup Security Official (BSO)
- Your MAC will have access to e-Filed cost report materials

MCReF (M-Cref) Detailed Overview

System Login: https://mcref.cms.gov

- Access is controlled by EIDM
- Restricted to EIDM PS&R SO / BSO
- Existing PS&R SOs / BSOs already have access
- Any organization without access to PS&R must register a PS&R SO with EIDM.

MCReF Authorized Cost Report Filer

CMS has created within EIDM a dedicated MCReF role that the EIDM Security Official of your organization or Backup Security Official could delegate out to a particular person that they want for cost report filing. And the SO or BSO will be able to approve that role. And it's called the MCReF authorized cost report filer role.

Contact Information

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marklynnrhc@gmail.com www.ruralhealthclinic.com

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Questions, Comments, Thank You









