

## RURAL HEALTH CLINIC (RHC) PRODUCTIVITY STANDARD EXCEPTION REQUEST

Providers are required to meet minimum visit numbers per full-time employee (FTE) for physicians and mid-level practitioners in Rural Health Clinics (RHCs). The current standards are 4,200 visits per Physician FTE and 2,100 visits per mid-level practitioner FTE. If these minimums are not met, it may indicate excessive staffing relative to patient volume, leading to higher costs that are not considered reasonable for reimbursement. In such cases, the minimum visit numbers are used instead of actual visits on worksheet M-2, which reduces the cost per visit and consequently lowers Medicare reimbursement.

[CMS Pub. 100-02, Chapter 13, Section 80.4](#) allows providers to request exceptions to these standards at the Medicare Administrative Contractor's (MAC's) discretion. A checklist has been developed to guide providers through common situations that might warrant an exception. However, this checklist does not guarantee approval. The manual does not specify when RHC Productivity Standard Requests should be submitted or the review timeframe for the MAC. If a request is submitted after the desk review has started, the results may not be incorporated into the final settlement, but additional documentation can be submitted for reopening consideration. The decision to reopen ultimately lies with the MAC.

### Facility Information

Main Hospital Name	
Main Hospital Provider Number (CCN)	
RHC Provider Number (A separate form should be completed for each clinic)	
Impacted Fiscal Year End (FYE)	
RHC City	
RHC County	
Date of Submission of Request	

## Questionnaire

1. What is the current number of FTEs and visits for the RHC for this cost reporting period for each category of staff?

Worksheet (W/S) and Line	Col. 1 FTEs	Col. 2 Total Visits
W/S M-2 Line 1 – Physician		
W/S M-2 Line 2 – Physician Assistants		
W/S M-2 Line 3 – Nurse Practitioner		

2. What was the number of clinic visits for the RHC in the prior year, and did the RHC request and receive approval for an RHC standard in that prior year?

Worksheet (W/S) and Line	Col. 1 FTEs	Col. 2 Total Visits
W/S M-2 Line 1 – Physician		
W/S M-2 Line 2 – Physician Assistants		
W/S M-2 Line 3 – Nurse Practitioner		

3. What visit count are you requesting as an exception to the standards of 4,200 (Physicians) and 2,100 (Mid-Level Practitioners)?

**For questions 4-8, you only need to complete the ones that relate to your request, and that you believe may help justify the request for an exception to the RHC Productivity Standards.**

4. Explain and demonstrate whether the clinic employs no more than the minimum number of staff (physician and mid-level practitioners) necessary to meet applicable certification requirements. Include details on what the current staffing level is for each type and what the minimum certification requirements are.

5. Is the clinic listed in a Primary Care Health Professional Shortage Area (HPSA)? If so, provide documentation from [HPSA Find](#), or another similar resource.
  
6. Document how the population base of the service area is significantly lower than would be needed to generate sufficient visits to meet the minimum number of visits required of the RHC Productivity Standards. This generally requires evidence for #4 as well.
  
7. Document whether any new physicians or mid-level practitioners were added during the cost reporting period in question and when they started. Explain why you believe this may require a temporary reduction to the RHC Productivity Standards.
  
8. Explain and document any other justification for an exception to the RHC Productivity Standards.

This submission is made by:

Name	
Title	
Date	