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TO: All Nebraska RHCs  
FROM: John L. Roberts, MA, Executive Director  
DATE: June 3, 2020  
SUBJECT: RHCs and COVID-19 Testing – Fact Sheet

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COVID-19 testing is critically important to defeating this virus. It will not only provide information necessary to policy makers as they struggle with next steps, but it will also help to reassure the American people that it is safe to resume “normal” activities.

### **Background**

As part of the CARES Act, Congress appropriated an unprecedented amount of money - \$225 Million specifically for RHCs for COVID-19 testing and testing related activity. HHS adopted a policy that they would provide an equal amount to every RHC, regardless of size. This meant that smaller RHCs (by revenue and/or staff) would receive a larger payment as a percentage of clinic revenue than a larger clinic. This was intentional.

On May 20, 2020 the Department of Health and Human Services released funds to virtually every federally certified Rural Health Clinic. Each eligible RHC received a deposit of \$49,640 in their account if they have an ACH/EFT arrangement with CMS. If a clinic does NOT have an ACH/EFT billing arrangement, they will receive their funds by mail for this amount.

### **Why were RHCs chosen for this program?**

RHCs are a respected voice in your community. Members of your community look to you for answers and solutions to healthcare problems affecting the entire community, not just those who might walk through your doors. Congress and the Administration are looking to the RHC community to step up, be creative and help stop the spread of the Corona Virus.

### **Who is eligible to receive the Rural Health Clinic Testing funds?**

All RHCs that have CMS Certification Numbers (CCNs) and are listed in either (1) the CMS Provider of Service file (March 2020) or (2) the CMS Survey & Certification's Quality, Certification and Oversight Reports (QCOR) before May 7, 2020.

### **Is there a time limit on how quickly I need to spend this money?**

No. If you have already been doing testing or testing related activities for which NO payment was received from another source, monies could be applied to those expenses retroactively – document! If you do not start testing until August (i.e. perhaps for students returning to school). That is OK – Document. Just document the COVID testing or testing related activities you undertook and how much was allocated to that purpose.

### **What are some examples of what RHCs can I do with this money?**

RHCs have WIDE latitude in how they can spend this money as long as it is for direct or indirect expenses related to COVID-19 testing or testing related activities. Primarily these funds are used for the planning and implementation of a COVID-19 testing program including efforts to maintain or increase rural health clinic capacity and personnel levels to support COVID-19 testing and related clinical and operational needs, including hiring and contracting with providers and other personnel

Examples of related expenses include, but are not limited to:

- Building or construction of temporary structures
- Leasing of properties or retrofitting facilities as necessary to support COVID-19 testing - Minor alteration or renovation (A/R) projects directly supporting testing capacity expansion
- Training providers and staff on COVID-19 testing procedures
- Reporting data to HHS on COVID-19 testing activities
- Purchasing PPE for employees to wear who may be involved in obtaining samples
- Development of testing plans for both active infection and prior exposure
- Procurement and distribution of tests within the service area
- Purchase of testing equipment and supplies
- Temporary drive- or walk-up testing
- Laboratory services
- Patient and community education related to testing
- Assessment of symptoms, delivering test results, and appropriate follow up assessment, including by telephone, text monitoring systems, or videoconference
- Testing personnel to support a safe workplace and facilitate timely return to work
- Personnel training related to testing
- Outreach to patients who may be at high risk or who have access barriers
- In coordination with federal, state and local public health activities, notifying identified contacts of infected health center patients of their exposure to COVID-19, consistent with applicable law (including laws relating to communicable disease reporting and privacy)

- Reporting information on COVID-19 infection to federal, state, and local public health agencies consistent with applicable law (including laws relating to communicable disease reporting and privacy)
- Equipment (e.g., telehealth equipment, temporary and non-fixed barriers to separate patients, vehicles to transport patients or health center personnel)
- Health information technology and digital tools (e.g., technology to support patient engagement and remote monitoring, case management, health information exchange with state and local public health partners, enhanced reporting)
- Purchase or lease of mobile vans/units directly supporting testing capacity expansion

You COULD be subject to an audit at a later date in which you could be asked to provide a report on how you spent the money. You should keep an account of how you spent the money.

**If an organization has multiple RHC sites, which RHC will receive the Rural Health Clinic Testing funds?**

Rural Health Clinic Testing funds will be distributed to the banking account information associated with the organization's billing TIN, based on the organization's number of eligible RHC sites. Billing TINs receiving a payment that operate more than one RHC site have discretion to distribute the payment among their RHC sites.

**Are there terms and conditions?**

Within **90 days** of receipt of this money if receipt is by ACH, within **90 days** of check payment issuance you should complete the attestation process. Recipients SHOULD sign the attestation form agreeing to the terms and conditions attached to receipt of these monies. Not returning the payment or attesting to the receipt of funds within this timeframe will be viewed as acceptance of the terms and conditions.

**Additional Information**

Attestation Portal: <https://covid19.linkhealth.com/#/step/1>

**Questions or you need additional help, please contact:**

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