

****MOBILE URGENT CARE**

POLICY & PROCEDURE STATEMENT**

(NC DHHS Medicaid & Medicare Compliant)

1. Purpose

Mobile Urgent Care (MUC) is committed to delivering high-quality, person-centered mobile healthcare services—including urgent care, vaccinations, consultations, community behavioral health services, and wellness/harm-reduction services—to individuals across North Carolina.

All services shall comply with **NC DHHS Medicaid Clinical Coverage Policies, Medicare Conditions of Participation, HIPAA Privacy & Security Rules, SAMHSA guidelines, CMS Waste/Fraud/Abuse regulations**, and state and federal **ethics standards**.

2. Scope

This policy applies to all Mobile Urgent Care employees, contractors, volunteers, and business associates involved in the delivery, documentation, billing, or coordination of services.

3. Policy Statement

Mobile Urgent Care shall provide medically necessary, evidence-based, and trauma-informed mobile clinical services in alignment with NC Medicaid service definitions and Medicare regulations. All services must be properly documented, medically justified, and delivered by licensed, credentialed, or board-certified professionals acting within their scope of practice.

MUC maintains strict adherence to **patient privacy, ethical standards**, and **fraud-prevention measures**.

4. Services Covered

4.1 Urgent Care Services

Mobile Urgent Care provides accessible mobile screenings and general urgent care evaluations, including:

- Blood pressure, glucose, and other chronic-condition screenings

- Rapid assessments for general health concerns (non-life-threatening)
- Evaluation and management (E/M) of minor illnesses
- Prescription of allowable medications consistent with NC Medical Board rules
- Referrals to emergency departments or specialists when warranted

Procedures:

- Clinicians must complete an E/M assessment using CMS Evaluation & Management guidelines.
 - Services must meet NC Medicaid Clinical Coverage Policy for **Evaluation & Management (CPT 99201–99499)**.
 - All abnormal or emergent findings must trigger referral or escalation procedures.
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4.2 Vaccination Services

MUC provides CDC-recommended vaccinations for adults and children, including but not limited to: influenza, TDAP, Hepatitis A/B, COVID-19, and other immunizations per NC Immunization Branch guidelines.

Procedures:

- Vaccines must be stored, transported, and administered according to **NC Immunization Program (NCIP)** and **CDC Vaccine Storage and Handling Toolkit**.
 - All vaccinations must be documented in the **North Carolina Immunization Registry (NCIR)**.
 - Informed consent must be obtained and documented.
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4.3 Consultation Services

MUC provides clinical consultations for common illnesses and minor injuries, including:

- Cold/flu symptoms
- Minor infections
- Allergic reactions
- Sprains and strains

- Medication management and refills (per licensure)

Procedures:

- Consultations must follow NC Board of Medicine scope-of-practice rules.
 - Telehealth follow-up is permitted per NC Medicaid telehealth policy.
 - Prescribing must comply with the **NC Controlled Substances Reporting System (CSRS)** when applicable.
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4.4 Specialized Community Behavioral Health Services

Mobile Urgent Care delivers behavioral health assessments and interventions in accordance with NC DHHS Clinical Coverage Policies (e.g., **Outpatient Behavioral Health, SUD services, peer support, crisis interventions**).

Services include:

- Mental health screenings
- Suicide risk assessment
- Substance use assessments
- Referral to Crisis Services, Mobile Crisis, and MAT providers
- Brief intervention and harm-reduction encounters

Procedures:

- Use validated screening tools (PHQ-9, GAD-7, C-SSRS, DAST-10, AUDIT).
 - Immediately escalate any life-safety threats to 911 or Crisis Services.
 - Behavioral health documentation must comply with **42 CFR Part 2** when applicable.
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4.5 Wellness & Harm-Reduction Services

MUC promotes community wellness through:

- Mental health screenings
- Preventative wellness checkups

- Distribution of harm-reduction supplies (per NC DHHS Harm Reduction Program Rules)
- Education on overdose prevention and naloxone use
- Health coaching and motivational interviewing

Procedures:

- All harm-reduction supplies must be tracked in inventory logs.
 - Naloxone distribution must meet NC Standing Order requirements.
 - Participants may remain anonymous unless Medicaid billing is requested.
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5. HIPAA Compliance

Mobile Urgent Care strictly enforces compliance with the **Health Insurance Portability and Accountability Act (HIPAA)**:

Privacy Standards

- Protected Health Information (PHI) must only be accessed on a need-to-know basis.
- PHI may not be disclosed without patient consent unless permitted by law.
- All mobile units must secure records within locked cabinets or encrypted systems.

Security Standards

- Electronic PHI (ePHI) must be stored in secure, encrypted platforms.
- Staff must use password-protected devices.
- Transmission of PHI must use HIPAA-compliant systems.

Breach Notification

- Any suspected breach must be reported to the Compliance Officer within 24 hours.
 - MUC must follow the HIPAA Breach Notification Rule (45 CFR §§ 164.400–414).
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6. Waste, Fraud & Abuse Prevention

MUC complies with **CMS, OIG**, and **NC Medicaid Program Integrity** requirements.

Prohibited Conduct

- Billing for services not rendered
- Duplicate billing
- Upcoding or miscoding services
- Falsifying records
- Kickbacks, inducements, or unethical referrals

Required Safeguards

- All claims must be supported by complete, contemporaneous documentation.
- Supervisors will conduct routine chart audits and billing reviews.
- Any suspected misconduct must be anonymously reportable and investigated within 48 hours.

Disciplinary Action

Verified violations may result in suspension, termination, restitution, or reporting to NC DHHS, CMS, or law enforcement.

7. Ethics Policy

Mobile Urgent Care adheres to the following ethical principles:

- **Integrity:** Staff must be honest, transparent, and compliant with all laws.
- **Non-discrimination:** Services must be provided regardless of race, gender, disability, income, or insurance status.
- **Professional boundaries:** No exploitation, dual relationships, or inappropriate contact.
- **Informed consent:** Patients must be informed about their treatment options.
- **Cultural competence:** Staff must respect cultural, religious, and linguistic differences.

All staff must complete required **ethics and compliance training** annually.

8. Documentation and Recordkeeping

All services must be documented in real time and include:

- Patient demographics
- Reason for visit
- Clinical assessment
- Vital signs
- Diagnosis and treatment plan (ICD-10/CPT codes)
- Follow-up instructions
- Provider signature and credentials

Documentation must meet Medicaid/Medicare standards to support billing and medical necessity.

9. Quality Assurance & Continuous Improvement

Mobile Urgent Care maintains a Quality Assurance (QA) Program that includes:

- Quarterly chart audits
- Credentialing & privileging reviews
- Incident reporting and root-cause analyses
- Patient satisfaction surveys
- Annual compliance training

Corrective action plans will be implemented when deficiencies are identified.

10. Emergency & Safety Protocols

- Patients presenting with life-threatening symptoms must be referred to 911 immediately.
- Staff must follow emergency medical protocols consistent with NC EMS and NC Medical Board guidelines.
- Mobile units must maintain emergency equipment (AED, oxygen, first-aid supplies).

11. Non-Retaliation

MUC prohibits retaliation against any employee or patient who reports misconduct, safety concerns, or suspected fraud, waste, or abuse.

12. Approval

This policy is approved by:

Mobile Urgent Care Executive Leadership & Compliance Department

Effective Date: December 1, 2025

Review Cycle: Annual (or sooner if federal/state regulations change)