

37TH ANNUAL **AHA RURAL** | LEADERSHIP  
**HEALTH CARE** | CONFERENCE

**FEBRUARY 11-14, 2024 | ORLANDO, FL**

**SIGNIA BY HILTON ORLANDO BONNET CREEK**



February 13, 2024

# Session: Policy and Research Update: Financial Models for Rural Hospitals

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37TH ANNUAL **AHA RURAL HEALTH CARE** | LEADERSHIP CONFERENCE



# Having a Say in Shaping the Future: Adapting and Leading

Presentation in 2024 AHA Rural Health Care Leadership Conference  
February 13, 2024, Orlando, FL  
Keith J. Mueller, PhD

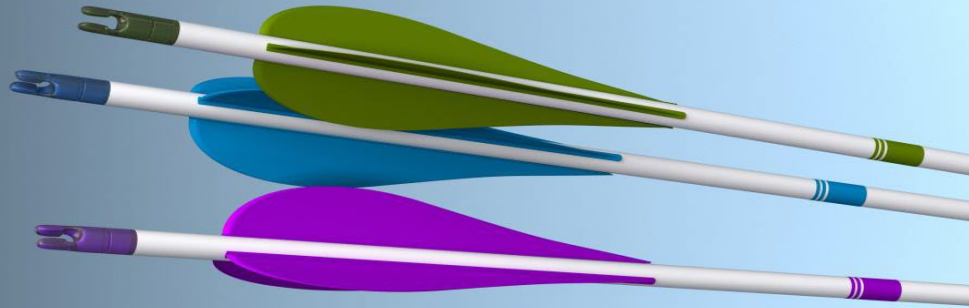
Gerhard Hartman Professor of Health Management and Policy  
Director, RUPRI Center for Rural Health Policy Analysis

# Outline of Comments



# Changing Goals in Payment Policy

- Reality check: Is continued increase in expenditures exceeding general inflation palatable?
- Assume no: Can we achieve savings aim by simply squeezing the turnip?
- Reality check: Are we close to achieving optimum health for all members of our communities?
- Assume no: How do we improve but not accelerate the cost curve?
- Aspirational Goal: Focus on total expenditures and wise investment; the quadruple aim of best patient experience, reducing costs, improving healthcare outcomes, improving clinician experience



# The Journey to Value-Based Care and Payment



Predates the Patient Protection and Affordable Act, 2011 (ACA)



Accelerated by the ACO shared savings program in Medicare







Point of attention of three presidential administrations and associated Congressional sessions – *not going away*



Visual from the Health Care Payment Learning & Action Network

# Health Care Payment Learning and Action Network (HCP LAN)

## Alternative Payment Model Framework

			
<p><b>CATEGORY 1</b> FEE FOR SERVICE - NO LINK TO QUALITY &amp; VALUE</p>	<p><b>CATEGORY 2</b> FEE FOR SERVICE - LINK TO QUALITY &amp; VALUE</p>	<p><b>CATEGORY 3</b> APMS BUILT ON FEE-FOR-SERVICE ARCHITECTURE</p>	<p><b>CATEGORY 4</b> POPULATION - BASED PAYMENT</p>
	<p><b>A</b></p>	<p><b>A</b></p>	<p><b>A</b></p>
	<p><b>Foundational Payments for Infrastructure &amp; Operations</b> (e.g., care coordination fees and payments for HIT investments)</p>	<p><b>APMs with Shared Savings</b> (e.g., shared savings with upside risk only)</p>	<p><b>Condition-Specific Population-Based Payment</b> (e.g., per member per month payments, payments for specialty services, such as oncology or mental health)</p>
	<p><b>B</b></p>	<p><b>B</b></p>	<p><b>B</b></p>
	<p><b>Pay for Reporting</b> (e.g., bonuses for reporting data or penalties for not reporting data)</p>	<p><b>APMs with Shared Savings and Downside Risk</b> (e.g., episode-based payments for procedures and comprehensive payments with upside and downside risk)</p>	<p><b>Comprehensive Population-Based Payment</b> (e.g., global budgets or full/percent of premium payments)</p>
	<p><b>C</b></p>		<p><b>C</b></p>
	<p><b>Pay-for-Performance</b> (e.g., bonuses for quality performance)</p>		<p><b>Integrated Finance &amp; Delivery Systems</b> (e.g., global budgets or full/percent of premium payments in integrated systems)</p>
		<p><b>3N</b></p>	<p><b>4N</b></p>
		<p>Risk Based Payments NOT Linked to Quality</p>	<p>Capitated Payments NOT Linked to Quality</p>



# Getting to Categories 3 and 4

- CMS Goal that 100% of beneficiaries in Traditional Medicare are in accountable care arrangements by 2030; and “the vast majority” of Medicaid beneficiaries
- Reaching toward global budgeting or per capita payment
- The journey includes emphasizing two critical components
  - Primary care delivered through person-centered health teams
  - Focus on *health*, including health-related social needs
- Requires a financial model to move resources to where needed *in each community*



# Part Two: Specific Approaches



- Medicare Advantage
- Shared Savings Program (Accountable Care Organizations)

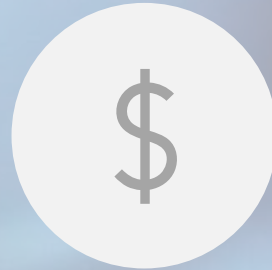
# Medicare and Medicaid Policy Shifts

- The CMS goal is for “Traditional Medicare,” not inclusive of Medicare Advantage (MA)
- MA plans will have their own strategies
- Medicaid is moving from state administered to states contracting with Managed Care Organizations (MCOs)
- State leverage is in terms of contracts with MCOs
- Federal role is leveraging the federal match payment – such as waivers to allow Medicaid expenditures to address health-related social needs

# Medicare Advantage



REALITY IS THAT  
MA IS *PRIVATE*  
*INSURANCE WITHIN*  
*MEDICARE*  
*PARAMETERS*



ENROLLMENT  
INCREASING, MORE  
THAN 50%, WITH  
NEARLY 40% OF  
RURAL  
BENEFICIARIES



FEDERAL  
PAYMENT IS  
CAPITATED, BUT  
TO THE HEALTH  
PLANS

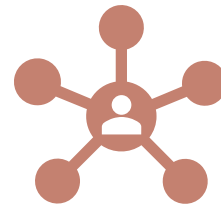


HEALTH PLAN  
PAYMENTS TO  
PROVIDERS  
VARIES

# Medicare Advantage



Attraction to enrollees:  
benefits, low premiums

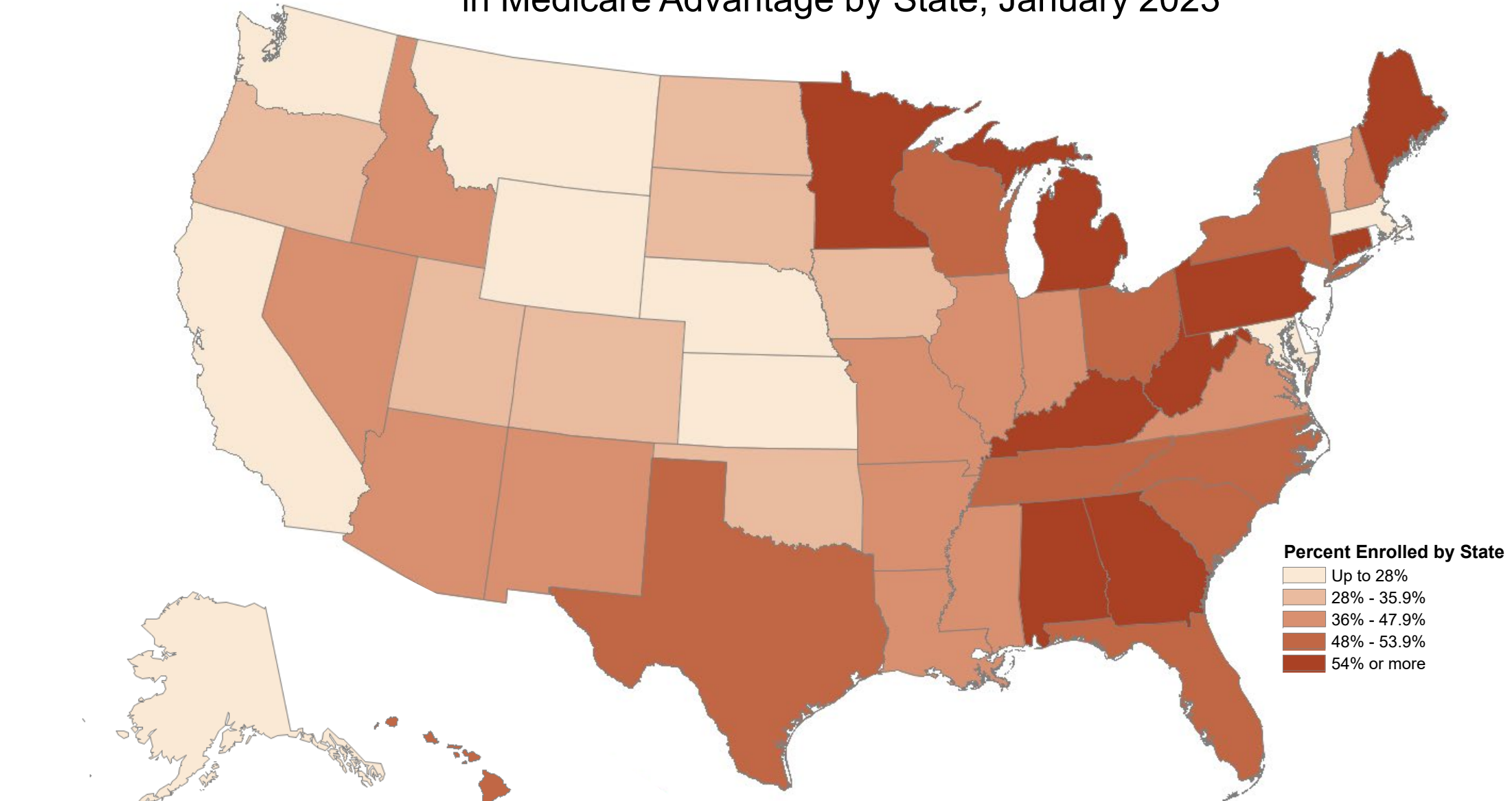


Potential problems for  
enrollees: narrow  
networks, limited benefits



What does it mean for a  
“new world” in health care  
delivery and finance?

# Percent of Eligible Non-Metropolitan Beneficiaries Enrolled in Medicare Advantage by State, January 2023



**Percent Enrolled by State**

- Up to 28%
- 28% - 35.9%
- 36% - 47.9%
- 48% - 53.9%
- 54% or more

Alaska and Hawaii not to scale

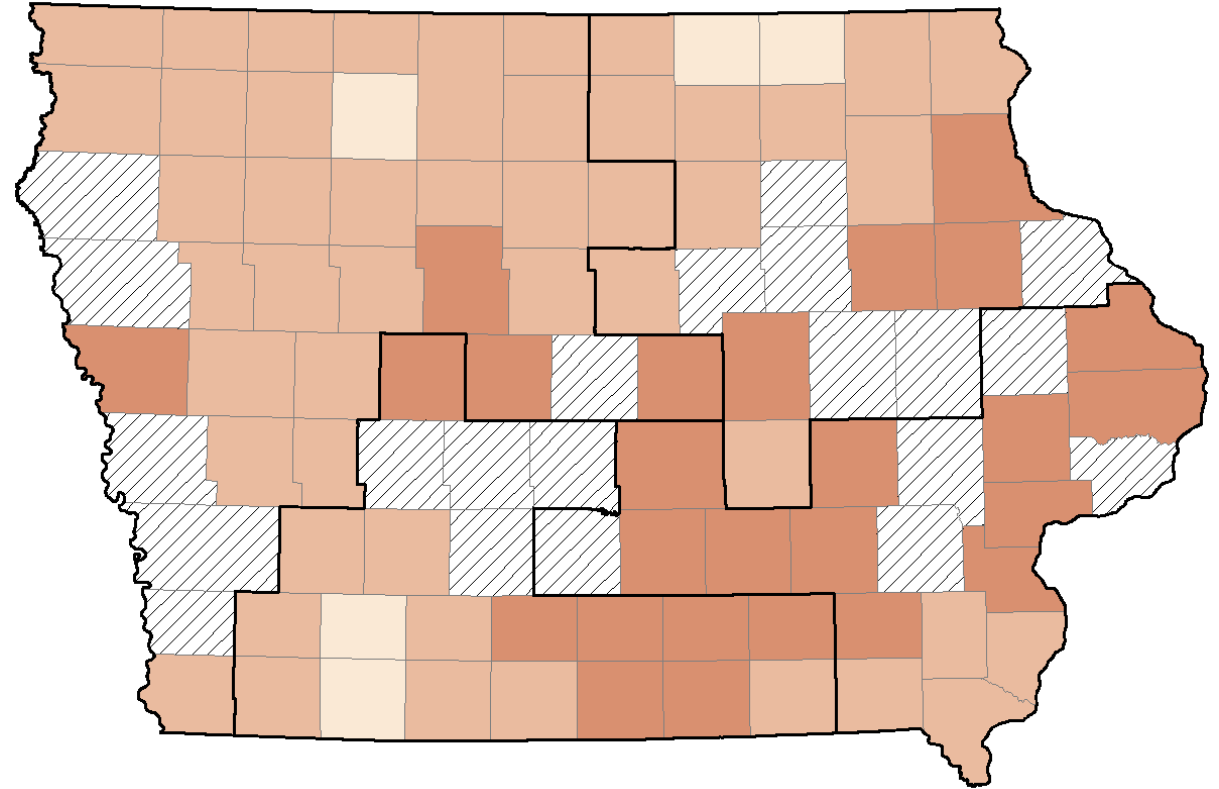
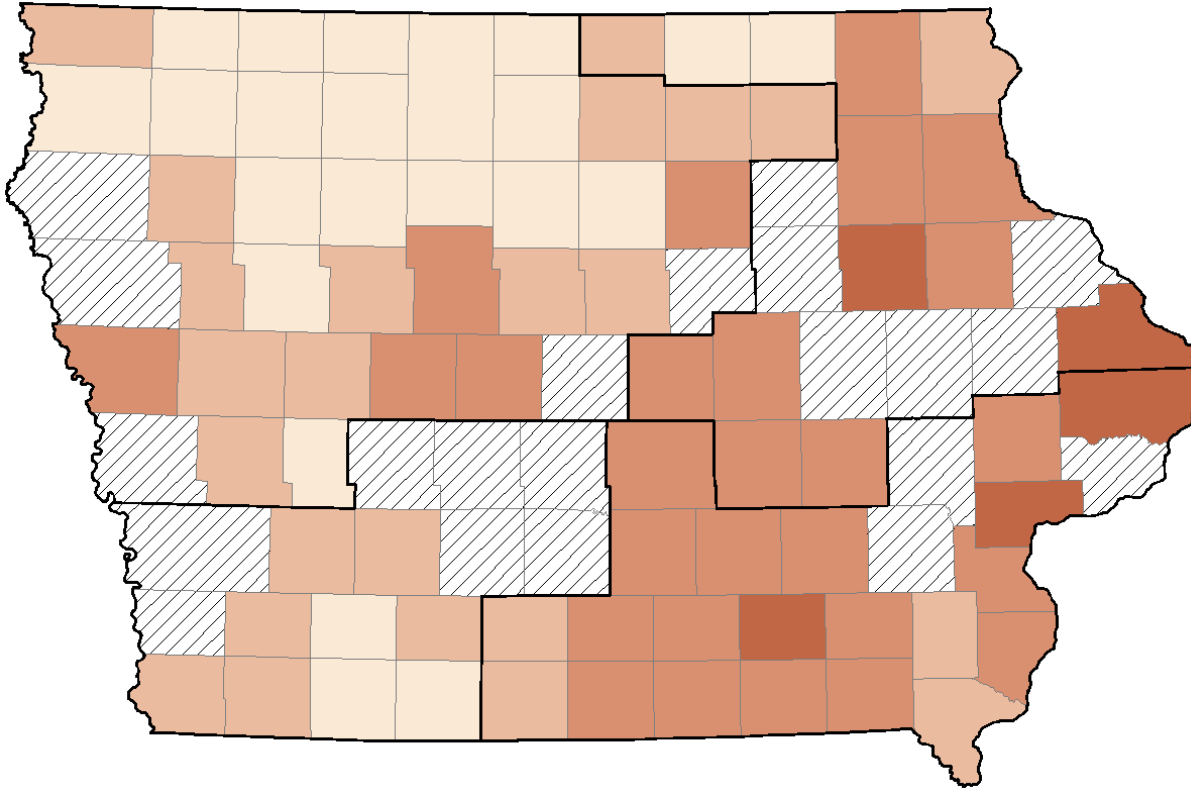


Source of data: Centers for Medicare and Medicaid Services (CMS) data, as of January 2023  
Produced by: RUPRI Center for Rural Health Policy Analysis, 2023  
Note: Delaware, New Jersey, and Rhode Island contain no non-metropolitan counties

# Percent of Eligible Medicare Non-Metropolitan Beneficiaries Enrolled in Medicare Advantage and other Prepaid Plans: Iowa

2020

2023



Percent Enrolled by County



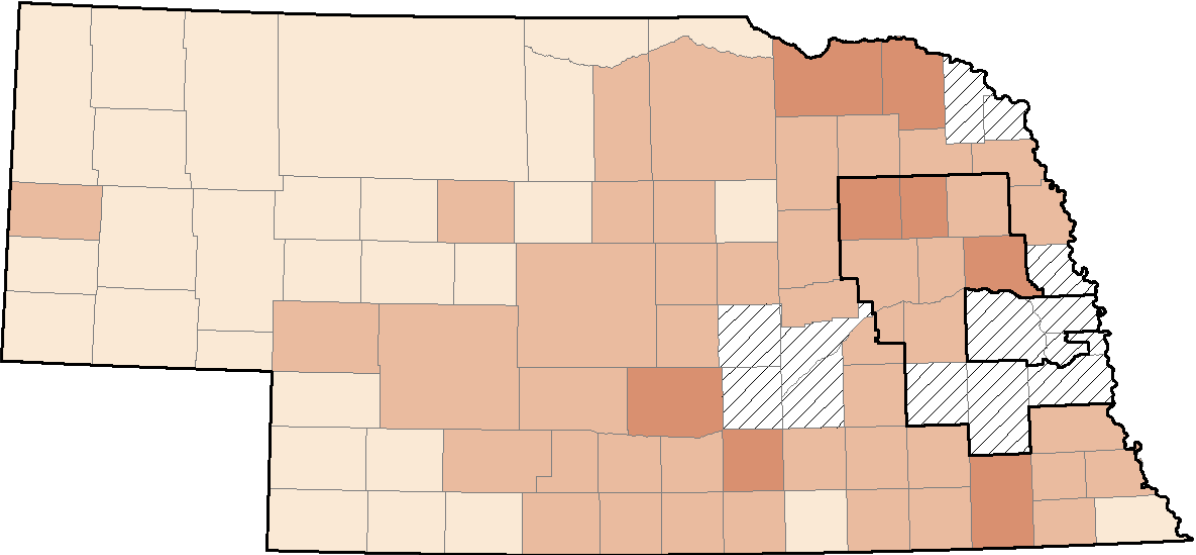
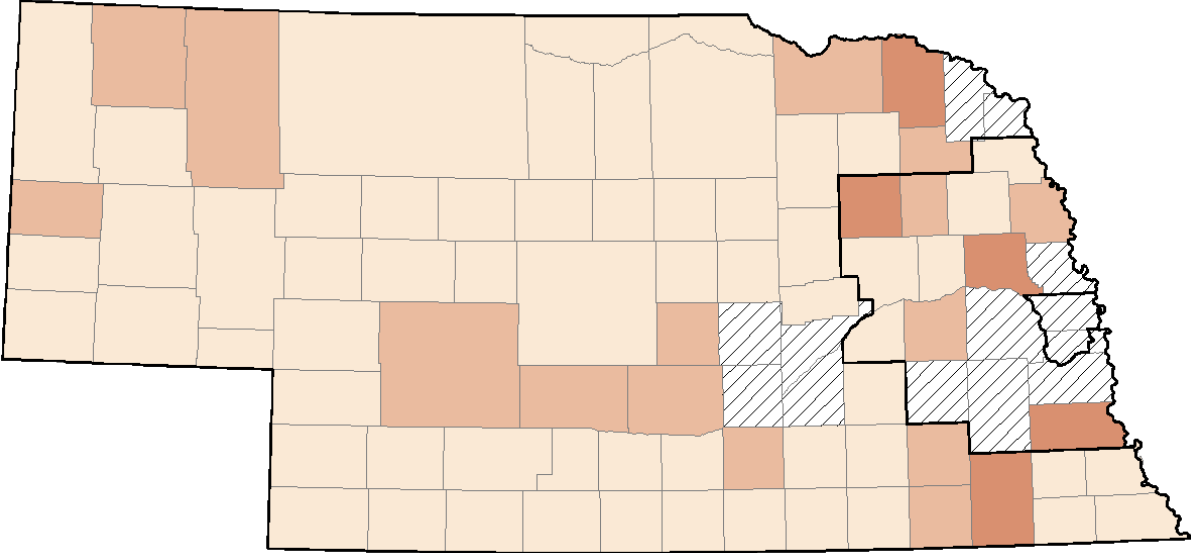
Percent Enrolled by County



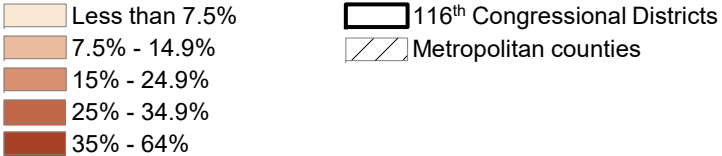
# Percent of Eligible Medicare Non-Metropolitan Beneficiaries Enrolled in Medicare Advantage and other Prepaid Plans: Nebraska

2020

2023



Percent Enrolled by County



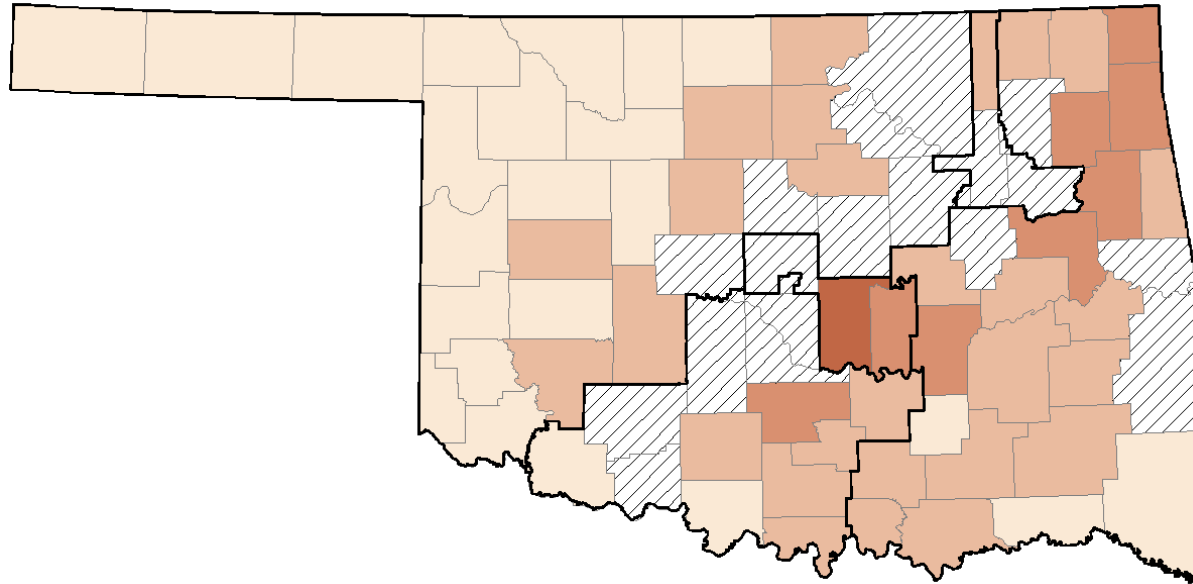
Percent Enrolled by County



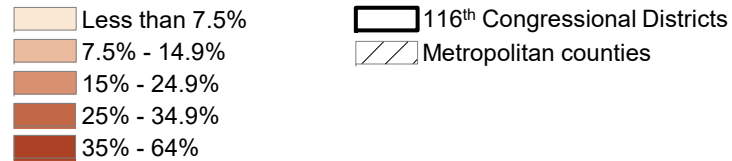


# Percent of Eligible Medicare Non-Metropolitan Beneficiaries Enrolled in Medicare Advantage and other Prepaid Plans: Oklahoma

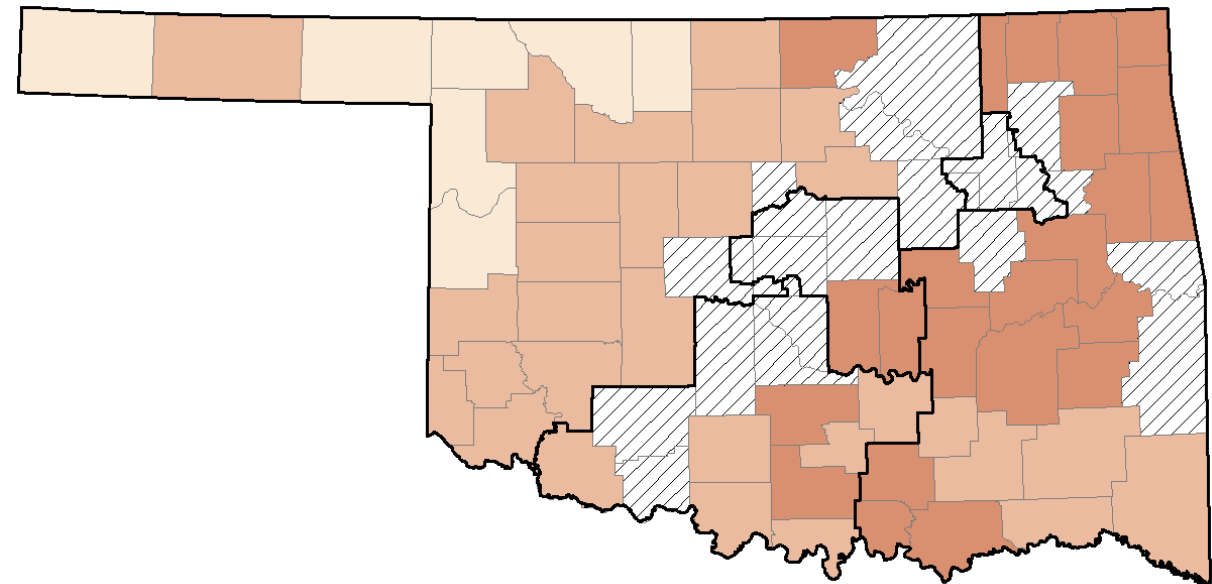
2020



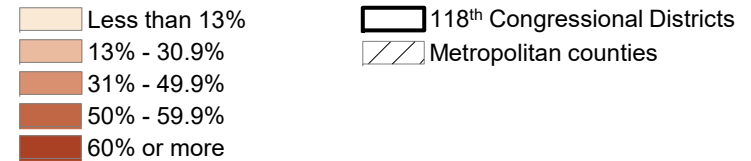
Percent Enrolled by County



2023

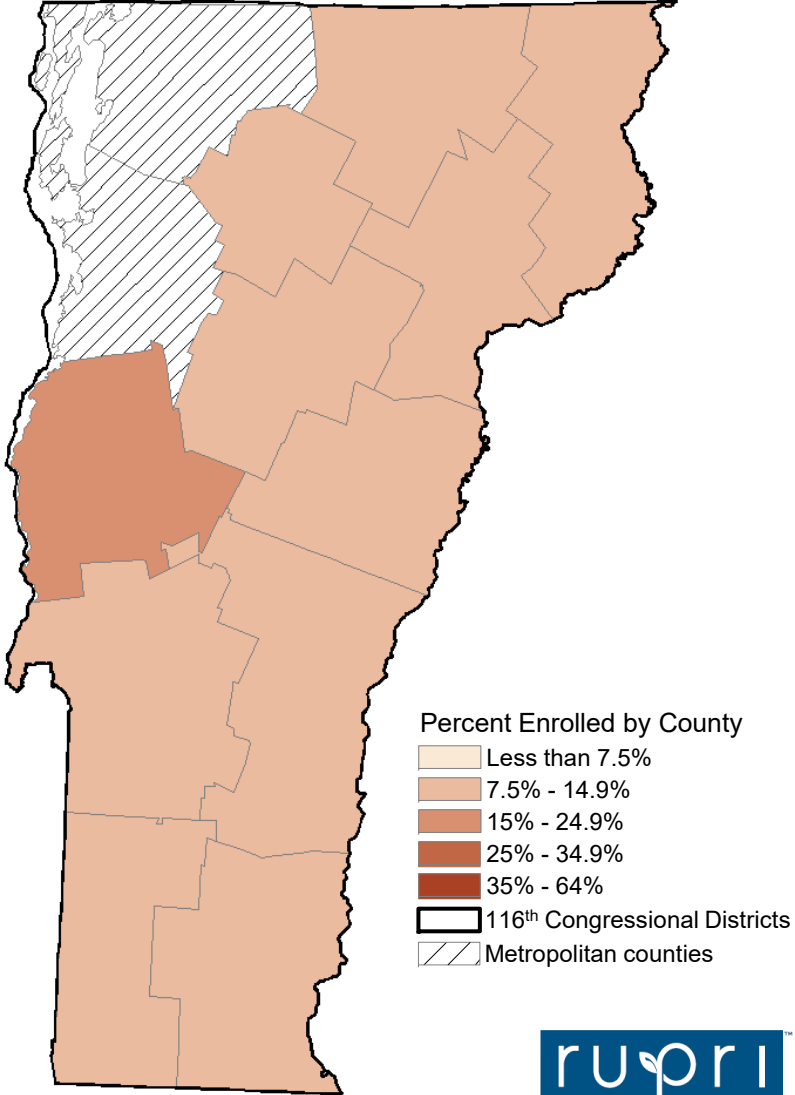


Percent Enrolled by County

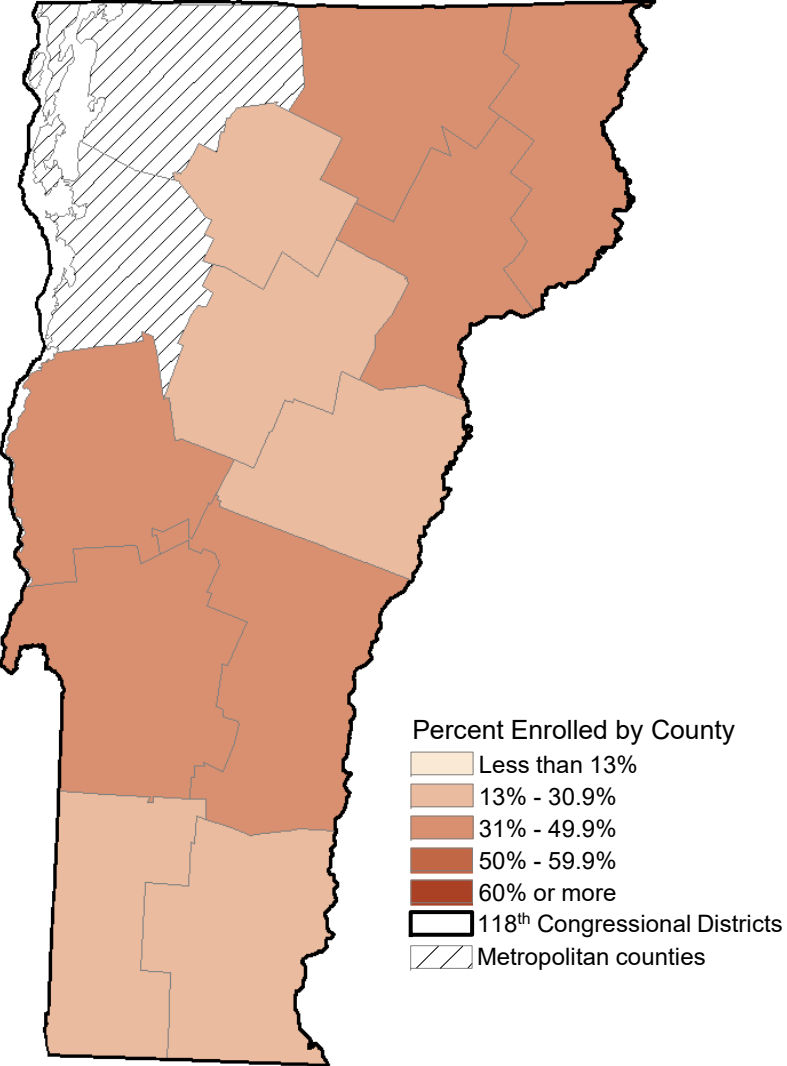


# Percent of Eligible Medicare Non-Metropolitan Beneficiaries Enrolled in Medicare Advantage and other Prepaid Plans: Vermont

2020

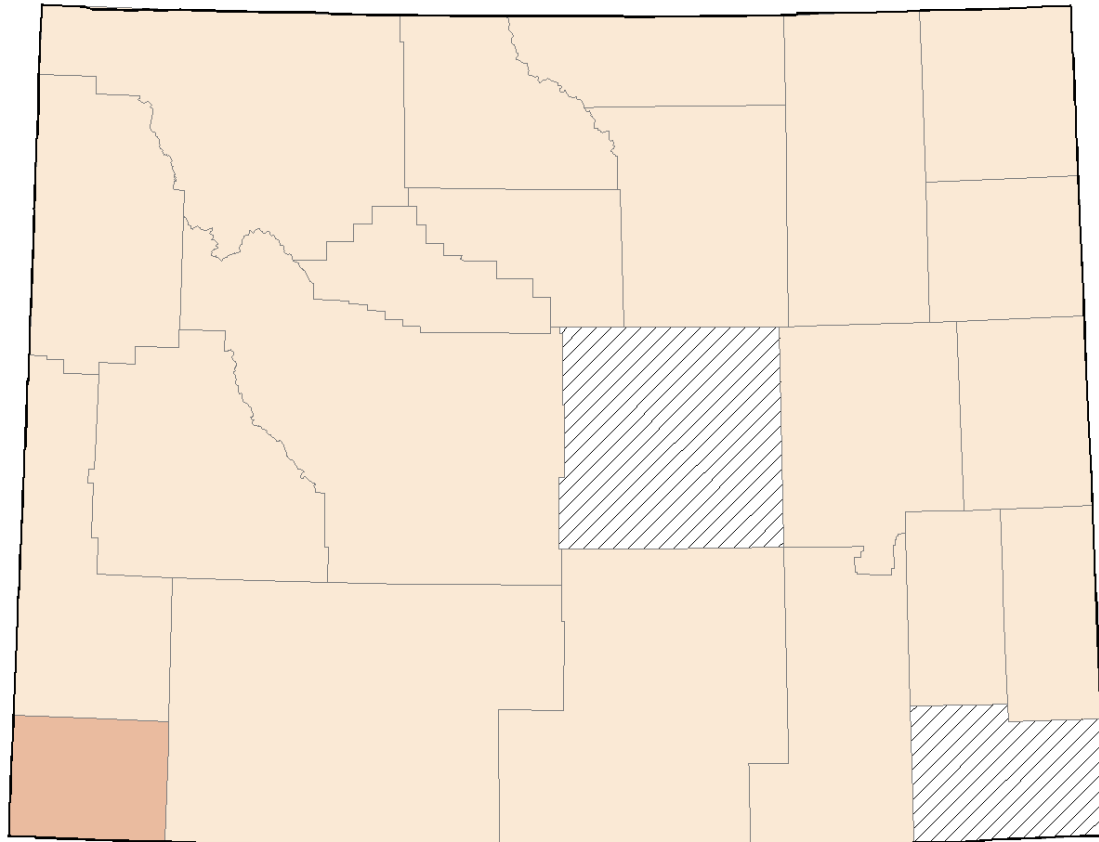


2023

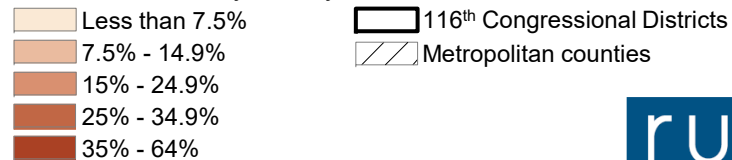


# Percent of Eligible Medicare Non-Metropolitan Beneficiaries Enrolled in Medicare Advantage and other Prepaid Plans: Wyoming

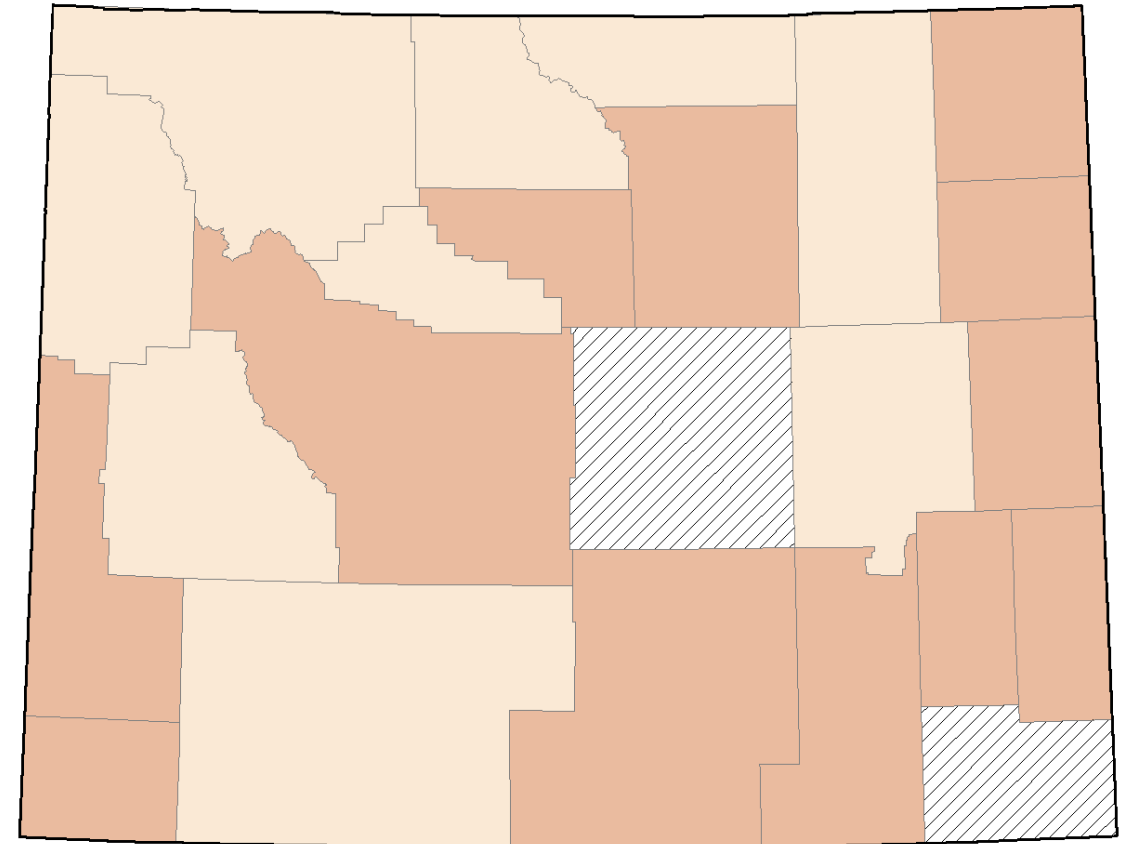
2020



Percent Enrolled by County



2023



Percent Enrolled by County



# Questions about MA Plans

- Who are the plans in my area?
- What is their influence on my revenue?
- What is my experience with prior approval, denied claims, timely payment?
- What is their philosophy in negotiating payment?
- Can I negotiate a new value-based payment contract?
- What are the consequences of not accepting them as a third-party payor?



# Shared Savings Program

Plateau of 561 in 2018, fell to 456 in 2023



## Composition in 2023

252 low revenue (55%)

2,240 Rural Health Clinics

467 Critical Access Hospitals

One-sided: 33% (151)

Two-sided include 144 in basic tracks, 161 in enhanced track

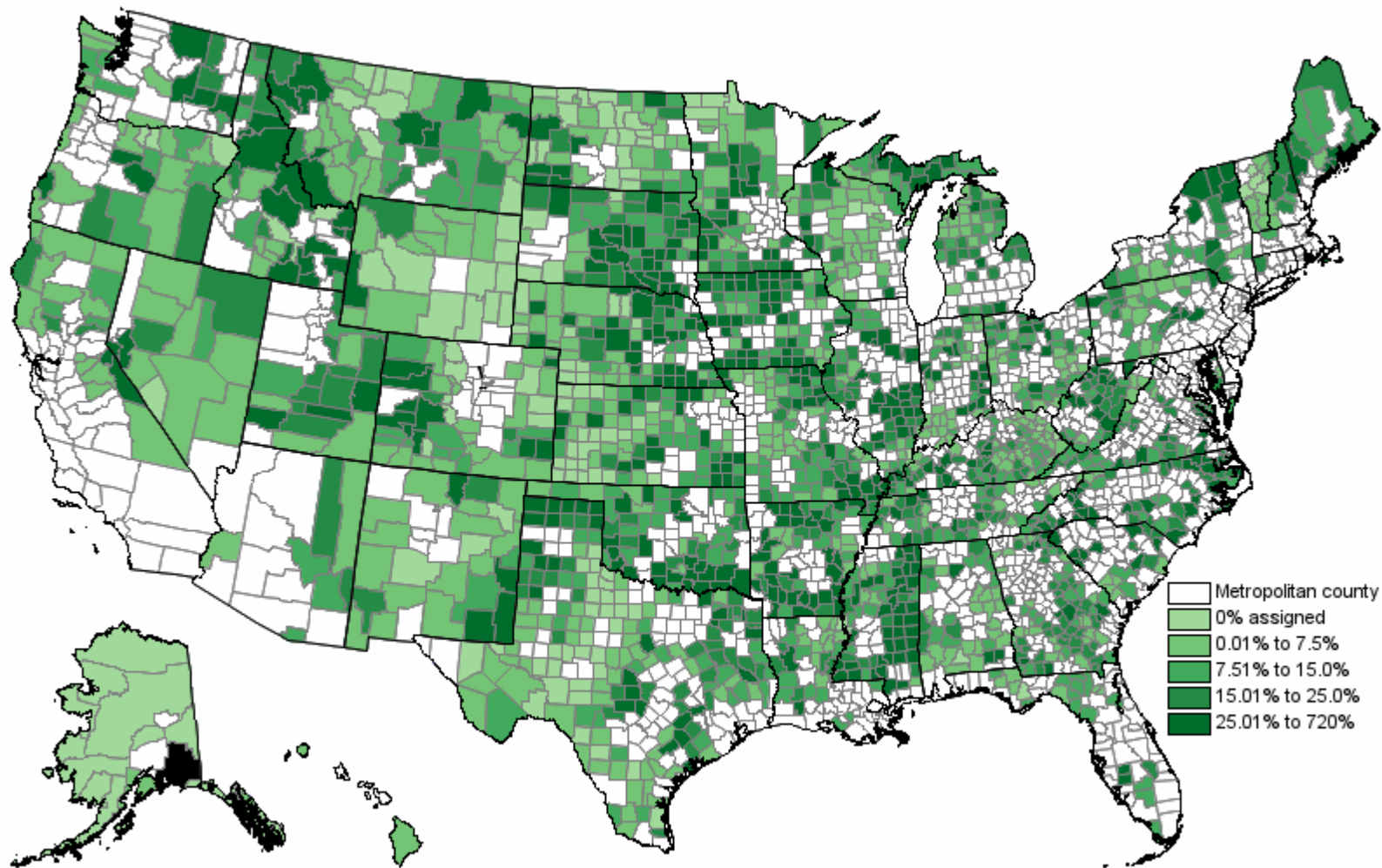
Source: CMS: Savings Program Fact Facts – As of January 1, 2023

# ACO Spread - 2023

## Medicare Shared Savings Program ACO Assigned Beneficiary Population by Rural County

**Note: This lists the Beneficiaries Assigned to an MSSP ACO by Rural County**

**In 2023, 467 CAHs are part of an MSSP ACO**



Source: [CMS - Medicare Shared Savings Program Fast Facts](#)

# SSP Changes In 2024

- Longer time in Basic track A, for inexperienced ACOs: (upside risk only): up to 7 years
- Advanced Interest Payment: one-time \$250,000 and quarterly per-beneficiary payments for first 2 years
- Changes to minimum savings rate (MSR) to allow shared savings at half regular rate until MSR is met
- Introduce Accountable Care Prospective Trend to adjust benchmarks calculated based on national and regional rates
- Reduce Negative Regional Adjustment Cap from 5% to 1.5%



# SSP Changes In 2024

- Adjustment for Prior Savings: Adding back into benchmark a portion of savings generated by ACOs
- Risk Score Growth Cap Adjustment: allow flexibility within a 3 percent cap on growth in the risk score
- Sliding Scale for Shared Savings and Losses: allow percentage of shared savings when ACO quality performance is below 30<sup>th</sup> percentile but at least in 10<sup>th</sup> percentile in of four outcome measures

Source: Medicare Shared Savings Program: Rule Changes and Implications for Rural Health Care Organizations. *Rural Health Value Policy Brief*. 2022. <https://ruralhealthvalue.public-health.uiowa.edu/files/RHV%20MSSP%20Rule%20Changes%20and%20Implications.pdf>

# Questions about ACOs

- Can my hospital benefit from a model that shares financial risk?
- Am I prepared to engage other entities (sometimes individuals) in my community in health teams?
- Are there other healthcare organizations (hospitals) in my state and region I should seek out in a network arrangement?
- Are there regional or national ACOs I should consider joining?



# Part Three: Hospitals Leading the Way



- Incentives
- Delivery System Change

# Aligning Incentives



Challenge of the legacy of encounter-based payment and volume-based incentives



Shift to enrollee-based payment and incentives to shift to lower-cost care



Value is achieving community-focused mission

# Delivery System Change: Possibilities

- Health teams, by any name (PCMH, PCHH, team) than incorporate clinical and non-clinical personnel
- Different sites of care, including more in-home
- Local networks that include community-based organizations
- Investments: from grant sources, from community foundations, from new payment design

## Conclusion: What Needs to be Done

- Take full advantage of advances in health care to shift locus of care to most cost-effective site
- Take full advantage of any investment capital available to build and maintain information systems
- Take full advantage of support for building networks and taking action through networks

## Rural Health Value Resources



- Value-based Care Assessment tool: <https://ruralhealthvalue.public-health.uiowa.edu/TnR/vbc/vbctool.php>
- Social determinants of health opportunities guide: <https://ruralhealthvalue.public-health.uiowa.edu/files/Understanding%20the%20Social%20Determinants%20of%20Health.pdf>
- Care Coordination: A Self-Assessment for Rural Health Providers and Organizations: <https://ruralhealthvalue.public-health.uiowa.edu/files/RHV%20Care%20Coordination%20Assessment.pdf>



## Rural Health Value Resources

- Web portal for all resources: [www.ruralhealthvalue.org](http://www.ruralhealthvalue.org)
- Rural community engagement resource guide: <https://ruralhealthvalue.public-health.uiowa.edu/files/Innovation-Profile-SERPA-ACO.pdf>
- Profiles in innovation: <https://ruralhealthvalue.public-health.uiowa.edu/InD/Profiles/>

**Rural Health Value**  
UNDERSTANDING  
AND FACILITATING  
RURAL HEALTH  
TRANSFORMATION.

## For further information:

- The RUPRI Center for Rural Health Policy Analysis <http://cph.uiowa.edu/rupri>
- The RUPRI Health Panel <http://www.rupri.org>
- Rural Health Value <http://www.ruralhealthvalue.org>



*Please note that the views expressed by the conference speakers do not necessarily reflect the views of the American Hospital Association.*

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The Rural Health Research Gateway ensures this research lands in the hands of our rural leaders.



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