


Center for Rural Health




**Rural Health Policy: Rural Health Within
the US Health Policy Process**

NURS 586 Rural Health Programs and Research

June 21, 2022

UND College of Nursing and Professional Disciplines

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and Assistant Professor**



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Rural Health**

The University of North Dakota
School of Medicine & Health Sciences

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Center for Rural Health

- Established in 1980, at The University of North Dakota (UND) School of Medicine and Health Sciences in Grand Forks, ND
- One of the country's most experienced state rural health offices
- UND Center of Excellence in Research, Scholarship, and Creative Activity
- Home to seven national programs
- Recipient of the UND Award for Departmental Excellence in Research

Focus on

- Educating and Informing
- Policy
- Research and Evaluation
- Working with Communities
- American Indians
- Health Workforce
- Hospitals, Public Health, EMS, Primary Care, and other systems.

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Today's Objectives:

1. To better understand the relationship between the rural setting and health policy.
2. To gain insight into current rural health policy issues.
3. To understand how health policy is developed.



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It is always about the community

This is what shapes rural health – viable health systems, access to quality health care, improving population health contributes to community health AND is a driver for rural health policy.

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The Importance of Values

*Ultimately our values guide our perceptions toward health,
health care, our view of the importance of “community”,
and the development of public health policy*

“It is not what we have that will make us a great nation, it is how we decide to use it”

Theodore Roosevelt

“Vision is the art of seeing things invisible”

Jonathan Swift

**“Americans can always be relied upon to do the right thing...after they have
exhausted all the other possibilities”**

Sir Winston Churchill

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Culture and Values and Public Policy

- Culture drives policy and policy affects culture
- Policy needs legitimacy –public belief
- However, conflict in policy is inevitable and natural
- Since values frequently conflict –political environment “sorts” things out
- Politics is a creative allocation of resources within a context of competing values
- Value screens or how we interpret policy choices through our own values
- Data and facts vs. values and beliefs – understanding within the context of prevailing values – masking, vaccine
- Policy framing – the use of metaphors to convey values

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Rural Health- An Overview

- Rural Health focuses on **population health** –CHNA as a tool to understand and take action
- Rural Health focuses on **infrastructure** that contributes to population health
- Rural Health is not urban health in a rural or frontier setting
- Rural Health can be framed as a **health equity or fairness issue**
- Rural Health can be framed as **interdependent/collaborative** or community engagement
- Rural Health is dependent on **viable communities** and viable communities can include a strong rural health system inclusive of **community sectors**
 - Education, economic/business, government, faith-based, and health/human services
 - Thus, rural health policy also is associated with rural economic development, human services, transportation, housing, and other policy categories.
- Rural Health is changing – “**volume to value**” – new payment and delivery mechanisms designed to better address population health, improve care, and (just maybe) reduce or control costs.
- Rural Health exists in a larger **environment** which has an affect on the community and the rural health infrastructure; however, the **community can take action** (engagement) that in turn **impacts the environment**.

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Significant Areas of Interest Addressed in Rural Health Policy

- **Reimbursement/Payment/MONEY (System redesign)** – dollars associated with what is done and/or what results (newer focus)
- **Health Workforce** – continuous problem but exacerbated during pandemic- post pandemic? Is it post or are there continuous phases. Workforce is seen as # 1 issue.
- **Health Care Quality and Performance** – relationship to health reform – early 2000's.
- **Population Health** – significant within health reform –health policy relates to health status as does economic policy, housing, education, judicial, transportation, human services
- **Telehealth**- similar to workforce impacted by the pandemic.
- **The Silos – the Health System, infrastructure, moving parts –**
 - Where? Rural and urban, system integration to provide access (bottom-line).
 - Who? Types of provider groups, independent or system, Amazon, Walmart, CVS
 - How ? Provider arrangement, payment streams
 - Logical system or is it? Heath care and policy structure, fragmented. Incremental
 - Health policy touches all elements 8
 - Again **ROLE OF OUR VALUES**

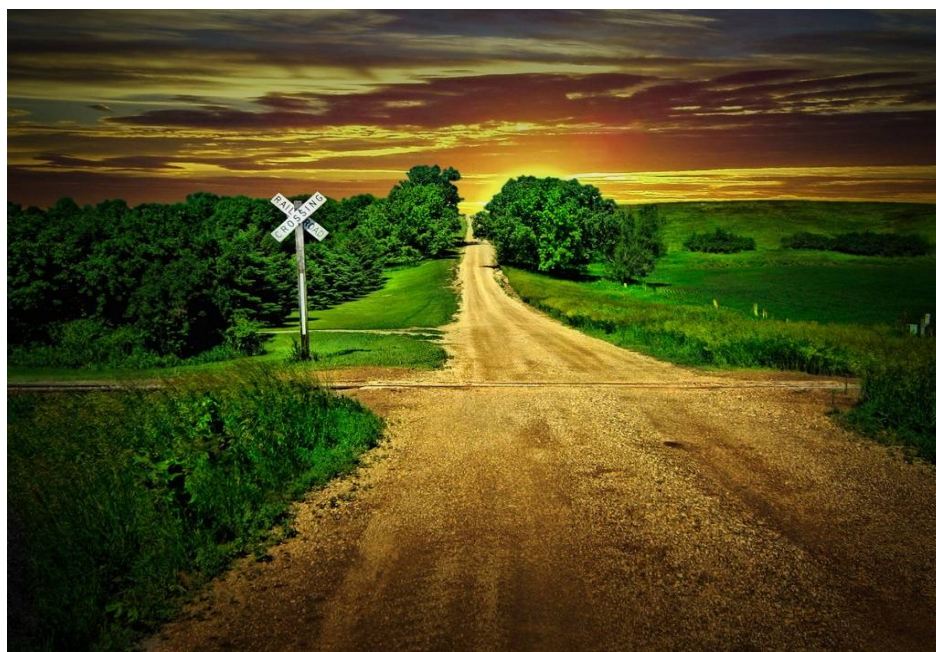
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Significant Areas of Interest Addressed in Rural Health Policy

- **Silos of a Health System**
 - **Hospitals** (private for-profit, non-profit, specialty, rural (CAH, PPS, SCH, MDH)-alphabet soup- independence of the rural system survives or part of larger, urban based systems.
 - **Physicians** -Primary care, specialty, PA, independent, group, large system, and now private business – Amazon, Walmart, etc.
 - **Nurses** – RN, APN, LPN –shortage/maldistribution, also private business, impact of pandemic
 - **Clinics** – CHC, RHC, multi-disciplinary, independent or hospital, “sliding fee”
 - **Nursing homes** – aging, community based services, role of the NH going forward
 - **EMS** – an array of provider categories, organizational arrangements, and in rural heavy reliance on the volunteer model. And finally quality metrics comes to rural EMS.
 - **Behavioral and Mental Health**- renewed focus, workforce concerns, access/access/access.
 - **Payors** – Medicare, Medicaid, commercial, CHIP, IHS, veterans – new APMs (volume the value).
 - **Pharmaceutical** –implication for rural with 340 B
 - **Overall, an interesting and complex blend of public/private levers.**
 - **Health policy tends to be focused on the silos. We think in increments and create incremental policy.**
 - **Can we say what our health policy is or is it more focused on describing our payment system, our hospital policy, our workforce policy?**
 - **We will see later much of it is associated at the federal level based on a intentional fragmentation of committees.**

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Key Concepts in Health Reform

- **2 Primary Changes: Insurance and Health System Redesign**
- **Population health** – improve outcomes emphasize prevention, care coordination, less hospital admissions/readmissions, less inappropriate ED visits
- **Social determinants of health**
- **Volume to value** (changing how we pay for services to be less volume and more value – quality and outcomes)
- **Accountable Care Organization (ACO)** is an example: National Rural Accountable Care Consortium (Caravan Health – 7 now 8 ND CAHs) - 22% of ND CAHs are associated with an ACO.
- More interest in CIN, CPC+, in ND Blue Alliance



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Population Health

“Health outcomes of a group of individuals, including the distribution of such outcomes within the group.” (Kindig, *What is Population Health?*)

- Significant focus in health reform (ACA) –conceptual driver of health reform policy and “system redesign” – CMMI created by the ACA (ACO, CHART)
- Groups in a population health approach can be based on geography, race, ethnicity, age, language, or other arrangements of people
- Focus – Health Outcomes (what is changed, what are the impacts, what results?)
- What determines the outcomes (determinants of health)?
- What are the public policies and the interventions that can improve the outcomes?
- What is or can be done in a rural health system to address population health?

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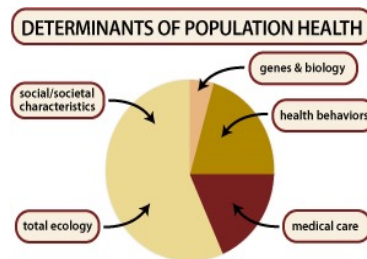
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Population Health Provides the Best Definitional Framework

It focuses on measurable outcomes from multiple sectors

- Clinical outcomes
- Education levels
- Poverty rates
- Environmental factors

Creating a holistic picture of a community's health




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Population Health in the Affordable Care Act

- **CMS Innovation Center** – development and testing of innovative health care payment and service delivery models (better care, better health, and lowered costs through improvements in the health system)
- Generate new models (in an experimental stage in health policy)
 - **Alternative Payment Models**
 - This is value based or movement from “volume to value” (care coordination).
 - Accountable Care Organizations (ACO)- Shared Savings is most common- 8 CAHs in ND (561 Shared Savings Medicare ACOs nationally in 2018 now about 500 in 2022) – saved Medicare \$1.7 B in 2018 and \$4 B in 2020 (\$2 B pay back to providers).
 - MACRA and MIPS (system change an alternative payment models – clinicians).
 - New in 2019 five new Primary Care Initiatives (PCI) – grow out of CPC+.
 - Simultaneous focus on increase quality and lowering cost.
 - Accepting risk – Trump administration is “risk on steroids.”
 - Continued under Biden.
 - CHART -rural model, CMS
 - ACO REACH –rural model, CMS.
- **BCBSND Blue Alliance**

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Social Determinants

World Health Organization definition:

"the circumstances in which people are born, grow up, live, work and age, and the systems put in place to deal with illness. These circumstances are in turn shaped by a wider set of forces: economics, social policies, and politics."

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Topics & States -
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Tools for Success -

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Modules
1: Introduction
2: Program Models
3: Program Clearinghouse
4: Implementation
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Social Determinants of Health in Rural Communities Toolkit


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Population Health Impacted by 2021 Infrastructure Act

- \$1.2 trillion – physical infrastructure that can improve population health
- “Once in a generation investment...think long term”
- Focus
 - Clean drinking water – replace lead water pipes
 - Roads and bridges
 - Air quality
 - Plug orphan oil wells
 - High speed internet –broadband – telehealth access –new Affordable Connectivity Program – rural and tribal impact
 - Electric transmission –invest in a clean energy power grid

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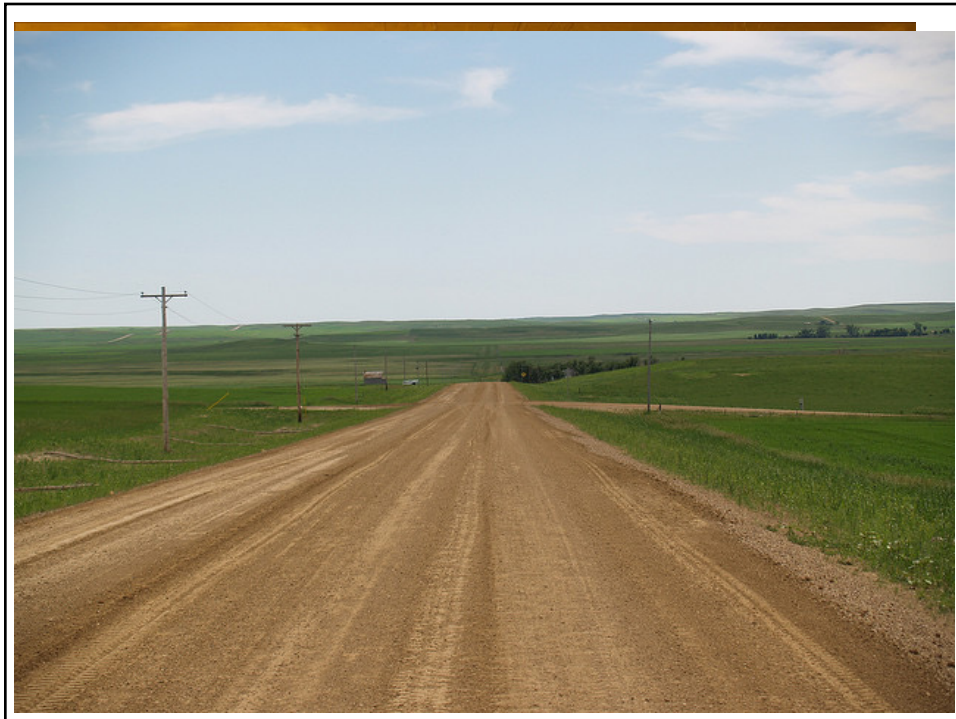
General Observations on the Health Care System

- Most people give too much credit to health care/clinical care when thinking of their health and not realizing it is likely 10-20% of health status.
- US spends more on health care than any other country at about \$4 Trillion a year (\$12,500 per capita vs. Germany, \$6,700; France, \$5,500; Canada, \$5,400; United Kingdom, \$5,200; and Japan, \$4,700. (2020 data). (Source Commonwealth Fund)
- 19% of US GDP – Germany, 11%; Canada, 11%, and GB, 10%.
- We spend more yet health outcomes are lower.
 - Lower life expectancy with the US at 78.6 years and Switzerland at 83.6 years. (Varies by race). American Indian is about 73 years.
 - US has highest chronic disease burden.
 - US has highest suicide rate.
 - US has highest rates of obesity.
 - US residents visit medical providers less frequently.
 - US second highest rate of hospitalization for hypertension and diabetes.

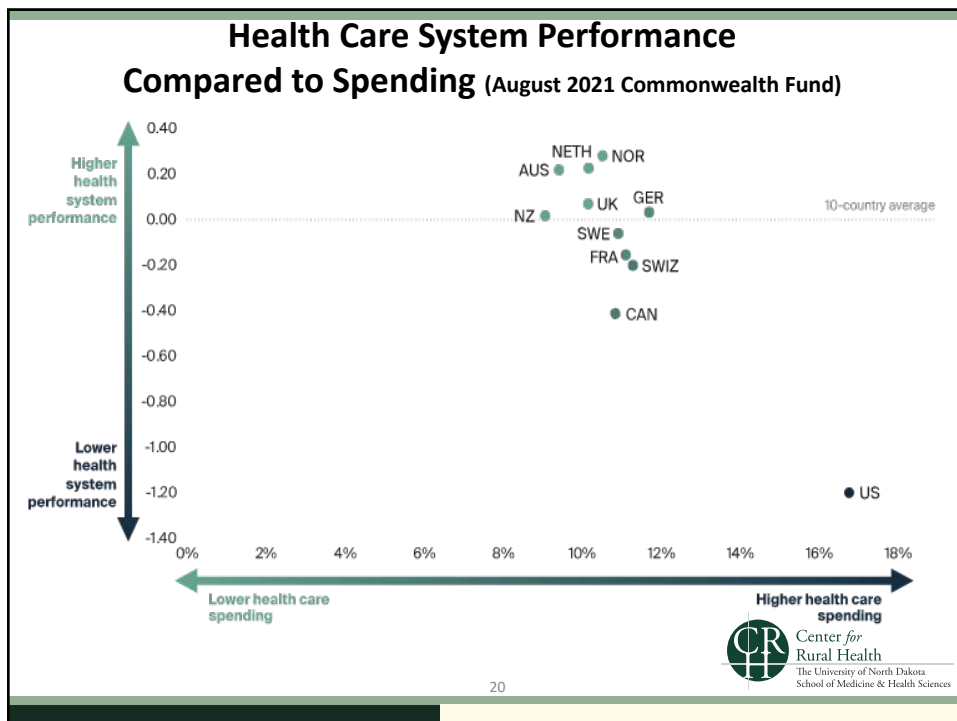


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ND CHNA Issues (2017-2019)

- Results below are for the 36 CAHs (CRH assisted 31 or 86%)
- 25 major themes
- 139 ranked needs (range 2 to 5 ranked needs per CHNA, average 3.9)
- Issues

○ Substance Abuse (behavioral health)	30 CHNA
○ Mental Health	30 CHNA
○ Attracting and Retaining Young Families	16
○ Having Enough Child Daycare providers	11
○ Ability to Retain Primary Care Providers	11
○ Availability of Resources to Help Elderly Stay in Homes	6
○ Not Enough Jobs with Livable Wages	5
○ Cancer	4
○ Obesity	4
○ Affordable Housing	3
○ Bullying/Cyberbullying	3
○ Cost of Health Insurance	3
○ Access to Healthcare	1
○ Domestic Violence	1

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How does the health policy process work to advance rural health concerns and needs or how does rural health work within the process or use that process?

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Health Policy – The Formal Side

- **Executive – Legislative Process (Congress and the Federal Agencies)**
 - **Obama** White House Rural Council to Strengthen Rural Communities ; **Trump** Task Force on Agriculture and Rural Prosperity; **Biden** ARP, Infrastructure, telehealth, targeted rural funding.
 - Biden Administration's almost weekly briefings related to rural –health, infrastructure, economic development, technology, and more.
 - **Senate Rural Health Caucus** – history in North Dakota - 1985
 - **House Rural Health Care Coalition** - 1987
 - Congressional policy making –**incremental, fragmented**, no single committee of jurisdiction for health. Multiple committees deliberately creates multiple power sources. **(KEY LESSON)**
 - **Committees with jurisdiction for health policy**
 - Senate Finance,
 - Senate HELP,
 - Senate Energy and Natural Resources,
 - S&H Indian Affairs, (Senator Hoeven)
 - S&H Judiciary,
 - Senate Veteran's Affairs (Senator Cramer)
 - House Ways and Means,
 - House Energy and Commerce (Congressman Armstrong)
 - S&H Appropriations (Senator Hoeven),
 - S&H Budget Committees (Senator Cramer, previous role of Senator Conrad as Chair)

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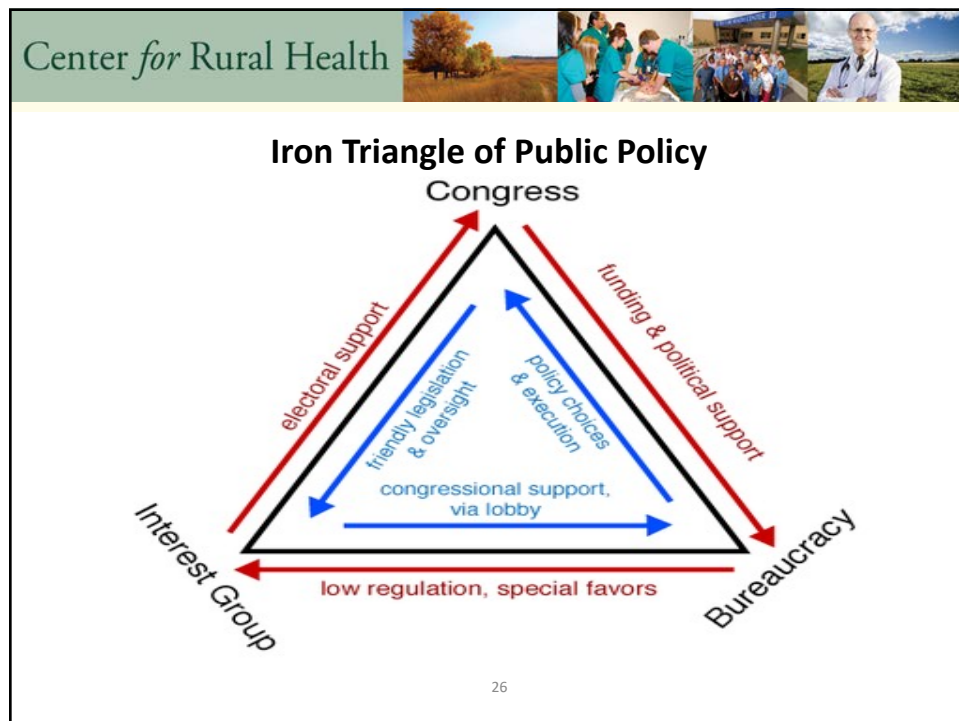


Health Policy – The Formal Side

- Executive – Legislative Process (Congress and the Federal Agencies)
 - Federal Agencies
 - **US Department of Health and Human Services**
 - ✓ HRSA and within it – Office of Rural Health Policy- SORH, FLEX, Rural Health Grants, Rural Health Advisory Council, Bureau of Primary Health Care – Community Health Centers, Bureau of Health Professions – healthcare workforce issues, Bureau of Clinician Recruitment and Services – National Health Service Corps
 - ✓ Centers for Medicare and Medicaid Services (CMS) – Medicare reimbursement and rules, **CMS Innovation** Grants for health reform
 - ✓ Indian Health Service (IHS). ACL (formerly AOA)- Nutrition and development
 - **Department of Agriculture** – Rural Development program has Community Facility loan/loan guarantee/grant program for capital improvement
 - **Department of Housing and UUSDHUD** – HUD 242 program for capital loans to rural hospitals
 - **Veterans Administration** – access to care, VA hospitals, VA CBOC (community based outpatient clinics, mental health
 - **Department of Transportation** –Infrastructure Act
 - **Department of Justice** – legal framework for how health providers operate and relate to each other.
 - Department of Education – Rural Low Income Schools, Rural Education Achievement.


Each federal department is a separate appropriations that is a function of Senate and House Appropriations Committee. Appropriations are constrained by the two Budget committees.

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Health Policy – The Informal Side

- **Setting the Agenda (prior to formal policy formulation and during development)**
 - **Advocacy**
 - **Interest groups play significant role**
 - ✓ Content experts – know the details – provide information (fact sheets, reports, meetings with staff, calls from staff)
 - ✓ Represent a point of view
 - ✓ Relied upon by policy staff – develop close working relationships
 - ✓ Interest groups want to be relied upon, “at the table”
 - **Important Rural Health Interest Groups**
 - ✓ National Rural Health Association (NRHA)
 - ✓ National Organization of State Offices of Rural Health (NOSORH)
 - ✓ RUPRI (other federally supported rural health research centers)
 - ✓ American Hospital Association (and state associations- **NDHA**)
 - ✓ State Rural Health Associations - **NDRHA**
 - ✓ American Medical Association (and state associations and subgroups)
 - ✓ American Nursing Association (and state associations)
 - ✓ American Public Health Association (and state associations)

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Health Policy – The Informal Side

- **Managing and influencing the agenda**
 - Control the information flow – resource to staff
 - Information – formal testimony, research, fact sheets but also behind the scene
 - Be honest and reliable (VERY IMPORTANT is YOUR CREDIBILITY) – your utility to staff is your reliability and your information
 - If you don't know say you don't know but will find out
- **Re-setting the agenda**
 - Continuous involvement with interest groups to prepare for next round
 - Continuous involvement with policy staff -- preparing them, helping them to see the implications of policy, determining what needs to be changed, provide evidence and data
 - Common questions – “What does this mean in North Dakota” “Is there an impact for us”

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So Really, How Does Rural Health Policy Work or Happen?

- **Advocacy**
 - Interest groups determine their agenda – internal process “point of view”
 - Interest groups sometimes form alliances with others – share agendas, “back-scratching” – to build greater numbers
 - Message framing – what messages work on policy makers, what do they like to hear, what format or communication strategy works best
 - Research shows for rural message framing concepts like “fairness” and “interdependence” work
 - ✓ People who live in rural ND should have the same expectation for quality care as urban, have reasonable access to care - fairness
 - ✓ Rural providers use networks and collaborate – avoid duplication, efficiency, effectiveness – interdependence
 - ✓ Rural organizations tend to work together, health care as part of the social and economic fabric of a community - interdependence
 - ✓ Under ACA movement to outcome based or pay for performance frame as “merit pay” to providers
 - Redundancy and repetition of messages are “positive” in policy – say the same thing over and over, try to have others (alliance partners) say your message.
 - We emphasize community, people (patients/community members, fairness, collaboration, cooperation, and economic impact

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Importance of Having Partners

- **Strength in numbers** – more voices with same message
- **Redundancy in policy can actually be good** – more voices, same message
- **An association if it is the primary advocate needs it members involved (elected officials like “real people”) but also other associations and their members** – CAH administrators on hill visits
- **Identify the commonality of issues and forge alliance around that subject – may be secondary for other association but can add to their message**
 - Hospital Association and SORH – rural health outreach grant funding
- **Need to be willing to make compromises** – more and more important
- **Willingness to support partner on their issues makes it easier for them to support you on your issues** – their primary is your secondary issue, and your primary is their secondary issue, “you got to give to get in politics”

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So Really, How Does Rural Health Policy Work or Happen?

- **Role of Research**
 - NRHA works to create SRHC and HRHC leads to FORHP which creates research centers, SORH, Flex (also led to SRHA)
 - PPS and shakeout of rural hospitals came from lack of any national rural health infrastructure (no independent academically based rural health research centers)
 - CRH Bush grant on research led to the model FORHP used for research centers
 - First ORHP research centers in 1987 (CRH was first generation)
 - 8 Rural Health Research Centers and Policy Analysis Initiatives
 - **Rural Health Research Gateway – located at UND Center for Rural Health**
 - “One stop shop (located at CRH) for :Research projects, publications (peer reviewed, policy briefs, fact sheets, annotated literature reviews, maps, and other products.
 - IA (Rupri) Maine, Minnesota, North Carolina, South Carolina, Tennessee, Texas, and Washington
 - **Research topics: -81 separate research areas**
 - Abuse Aging Coronavirus Case Management CAH Disability
 - EMS Environmental and ag health Health disparities Health care access
 - Health care finance Hospitals Medicare Maternal Health Minority health
 - Nurse/NP Obesity Oral health Pharmacy Public health Quality
 - SDOH Telehealth Veterans Wellness Woman's health Workforce

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Five Key Points on Policy Advocacy

- **Policy is a continuous process**
 - Congressional sessions begin and end, but the process of forming policy, influencing policy, changing policy, advocating for policy is ongoing
 - ACA is not the final Act in health reform – each Congress and President will make changes (every year multiple bills just on Medicare which goes back to 1965)
- **Important to have partners, allies, coalitions, alliances– forge relationships, cultivate relationships – some short term, some long lasting**
 - Organizations similar and even dissimilar to your organization
 - Relationships with policy makers and staff
- **Extremely important to be a resource to policy staff**
- **Recognize there is a relationship between policy formulation and implementation with research and evaluation – rural paid price in early '80's because no formal advocacy or policy structure**
- **Important to have a legislative champion/advocate**

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What are some examples of successful rural health policy?

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Rural Health Policy in Action

- **Rural Hospital Flexibility Program – “Flex program”**
- **Rural Hospital Models – waiver, CAH, FESC, FCHIP, REH**
- **Affordable Care Act**
 - Medicaid Expansion
 - APM – Value
 - Quality
- **Health Workforce**
 - NHSC
 - Rural Training tract
 - AHEC
- **Rural Health and COVID-19**

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Rural Health Policy in Action

National Rural Health Agenda -2023

- CDC Office of Rural Health
- Maternal Health Services
- Permanently expand telehealth
- Expand Medicaid GME
- Supplemental appropriations to NHSC and Nurse Corps for LR
- Expand nursing workforce
- Extend moratorium on Medicare Sequestration to rural hospitals –PH Emer.
- Support safety net hospitals beyond Public Health Emergency “Save Rural Hospital Act”
- Modernize RHC payment
- Ensure 340 b Drug Pricing Program
- Appropriation increases
 - SORH, Flex, FORHP, NHSC, AHEC

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Rural Health Policy in Action

Alternative Hospital Models

- 1974 – USDHEW – paper on using LPN not RN if 0 census
- 1987 - New York Rural Health Care Services Development Project
- 1988 National Rural Health Care Act of 1988
MedCAF (Medical Care Access Facility) service)
- 1988 Medical Assistance Facility (MAF) Montana Medicare Demonstration (operated about 10 years)
- 1988 Wyoming Medical Assistance Facility (MAF)
- 1988 California Alternative Rural Hospital Act
- 1989 Florida Emergency Care Hospital
- 1989 Rural Health Care Transition Grant (1989-1992)
- 1990 EACH/PCH (Essential Access Community Hospital/Primary Care Hospital) Grant Program
- 1999 **Critical Access Hospital (CAH)** (intended to be transition)
- 2010 Frontier Community Health Integration Project (FCHIP)
- 2021 Rural Emergency Hospital (REH)

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New Models to be Explored – Rural Health Policy – Payment and Delivery System Innovation

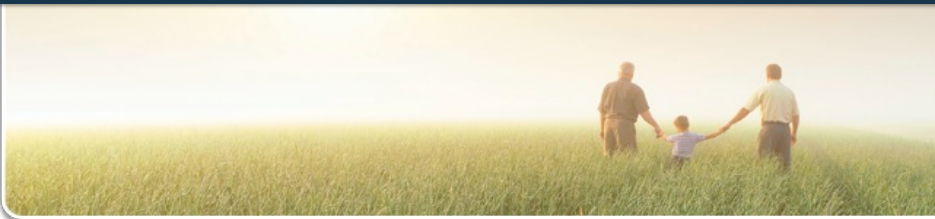
- COH Community Outpatient Hospital – 2015 (bill)
- REACH Rural Emergency Access Community Hospital – 2017 (bill) – Enacted in 2021 as REH.
- Global Budget –PA (started in 2018).
- Green Mountain Care – VT.
- CHART Community Health Access and Rural Transformation Model -2020.
- ACO REACH -2022.
- Study of Nursing Agencies (travel nurses) –Senator Cramer.

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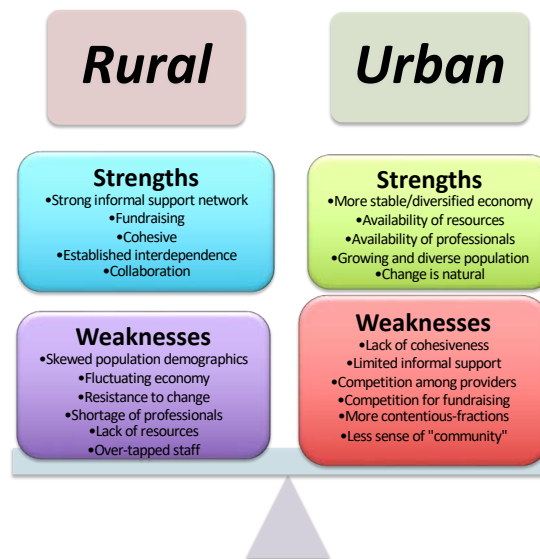
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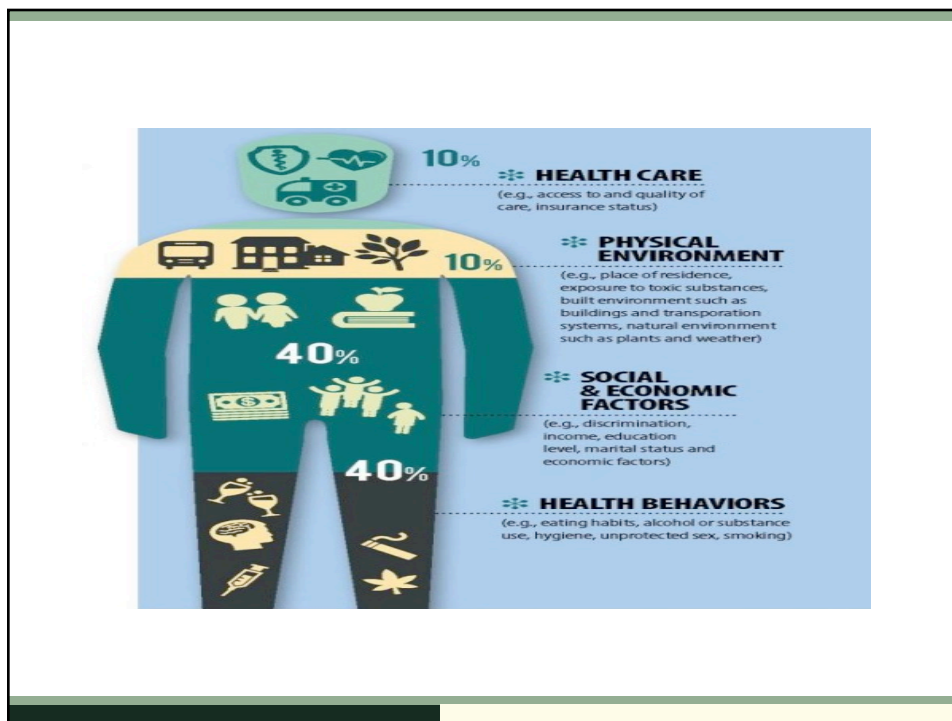
Additional Slides not Discussed in Presentation

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Rural and Urban Strengths and Weaknesses



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CHART Community Health Access and Rural Transformation Model -2020

- CMMI
- Guidance week of September 14, 2020.
- Significant payment and delivery system change and reform.
- Another volume to value process targeted at rural America.
- CMMI “rural markets are more likely to be subject to challenges: hospital closure, financial barriers, and workforce constraints.” (also transportation, limited plan choices, and narrow health plan networks).
- CMMI “the current volume-based system will not address these issues.”
Need: Community-based solutions to realign service delivery, meet unique community needs; solution built on previous successes that adopt value-based models.
- Two options:
 - Community Transformation Track
 - ACO Transformation Track

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Community Transformation Track

- \$75 million upfront investment in 15 rural communities (\$5 million each) to develop local transformation plans.
- CMS providing regulatory and operational flexibility, technical assistance, and **payment restructuring to participating hospitals from a volume system to one of “stable, monthly payment.”** (global budget concept, “capitated payment amount” -CPA)
- Lead Organization – a single entity comprised of a single county or set of contiguous or non-contiguous counties of census tracts. Must be rural.
- Lead Organization can be a state Medicaid agency, SORH, local public health departments, IPA, and Academic Medical Centers. Work with hospitals.
- Cooperative Agreement funding up front. \$2 million of the \$5 immediately. Rest contingent on progress.

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Community Transformation Track

- **CPA prospectively set annual payment to hospitals** – stable revenue with incentives to reduce fixed costs and avoid readmissions.
- Operational and regulatory flexibility – Medicare waivers (CDM incentives to patients and cover cost of patient transportation).
 - Waive certain CoP
 - Waive 3 day inpatient stay prior to admission to SNF
 - Telehealth expansion
 - Post discharge visits
 - Care Management Visits
 - CAH 96 hour rule
- Lead Organization develop and convene Advisory Council
- Participating hospital must be acute care, CAH, special rural designation
- State Medicaid is a required partner –sub-recipient of CA funding.

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Rural Health Policy in Action

- **Rural Hospital Flexibility Program – “Flex program”**
 - Purpose to provide TA to CAHs – deliberate policy to couple a new designation with a TA approach
 - Alliance of NRHA, NOSORH, AHA, SORHs, and State RHA
 - Each state worked with their congressional offices
 - 1st year grant for \$200,000 went to SORHs in eligible states
 - Flex funded at \$26 million a year
 - Grants to 45 eligible states
 - Flex Monitoring Team (RHRC research related to Flex and rural hospitals – evaluation leads to better data for congressional advocacy)
 - Flex is administered, like SORH, through FORHP
 - NRHA, NOSORH, and AHA push every year continued appropriation for Flex
 - CRH keeps in front of Congressional Offices

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Rural Health Policy in Action

- **Rural Health and the Affordable Care Act**
 - Basically, every health interest group had a stake
 - NRHA position papers and fact sheets
 - Formed core set of expectations
 - Health workforce
 - Provider reimbursement
 - Protect (and even expand) rural safety net – CAH, RHC, CHC
 - Access for rural people – financial concerns, but also availability of providers and financial viability rural health providers
 - NRHA worked with AHA and NOSORH
 - State level work with congressional offices on needs and impact
 - CRH emphasized health workforce, safety net, availability of providers, and financial viability of rural health providers and systems

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Rural Health Policy in Action

- **Rural Health and COVID-19**
 - Shut down in March 2020 of hospital outpatient and electives – about 2 months (no revenue) – Public Health hit hard, front line.
 - **CARES Act (NRHA and NOSORH advocate for funding and regs)**
 - CMS- Provider Relief Fund – about \$68 Billion to hospitals (\$11 B for CAH and RHC)
 - Medicare Accelerated Payment Program (loan and payback)
 - SBA -Paycheck Protection Program – also payback
 - HRSA -COVID SHIP - \$3.2 million to ND CAHs
 - Telehealth waivers – location, payment, added services allowed, see patients in their home- (big push to keep this)
 - Waiver on 96 hour and 25 bed for CAHs if a surge
 - 3 day SNF rule
 - PPE and testing to the states
 - ND SORH and Flex money to help CAHs manage the dollars
 - Focus going forward on rural health policy – try to keep what we like – telehealth