

A View from the Hill

2023 NHA-NeRHA Spring Forum and Rural Health Clinic Conference

Carrie Cochran-McClain
Chief Policy Officer

May 25, 2023



NRHA

Your voice. Louder.

NRHA is a national nonprofit membership organization with more than 21,000 members, made up of a diverse collection of individuals and organizations with the common goal of ensuring all rural communities have access to quality, affordable health care.

Our mission is to provide leadership on rural health issues.

What We Fight for on Behalf of Rural

- Investing in a Strong Rural Health Safety Net
- Reducing Rural Healthcare Workforce Shortages
- Addressing Rural Declining Life Expectancy and Inequality



Agenda

- The Rural Health Context
- What's Happening in Washington
- Rules, Rules, Rules
- Advocating on Rural Health



The Rural Health Context

The Rural Context



Rural areas make up 80% of the land mass in USA

Rural areas have roughly 17% of the US Population

Rural areas provide the food, fuel and fiber to power our nation

Access to high-quality health care is a requirement to keep these important resources available

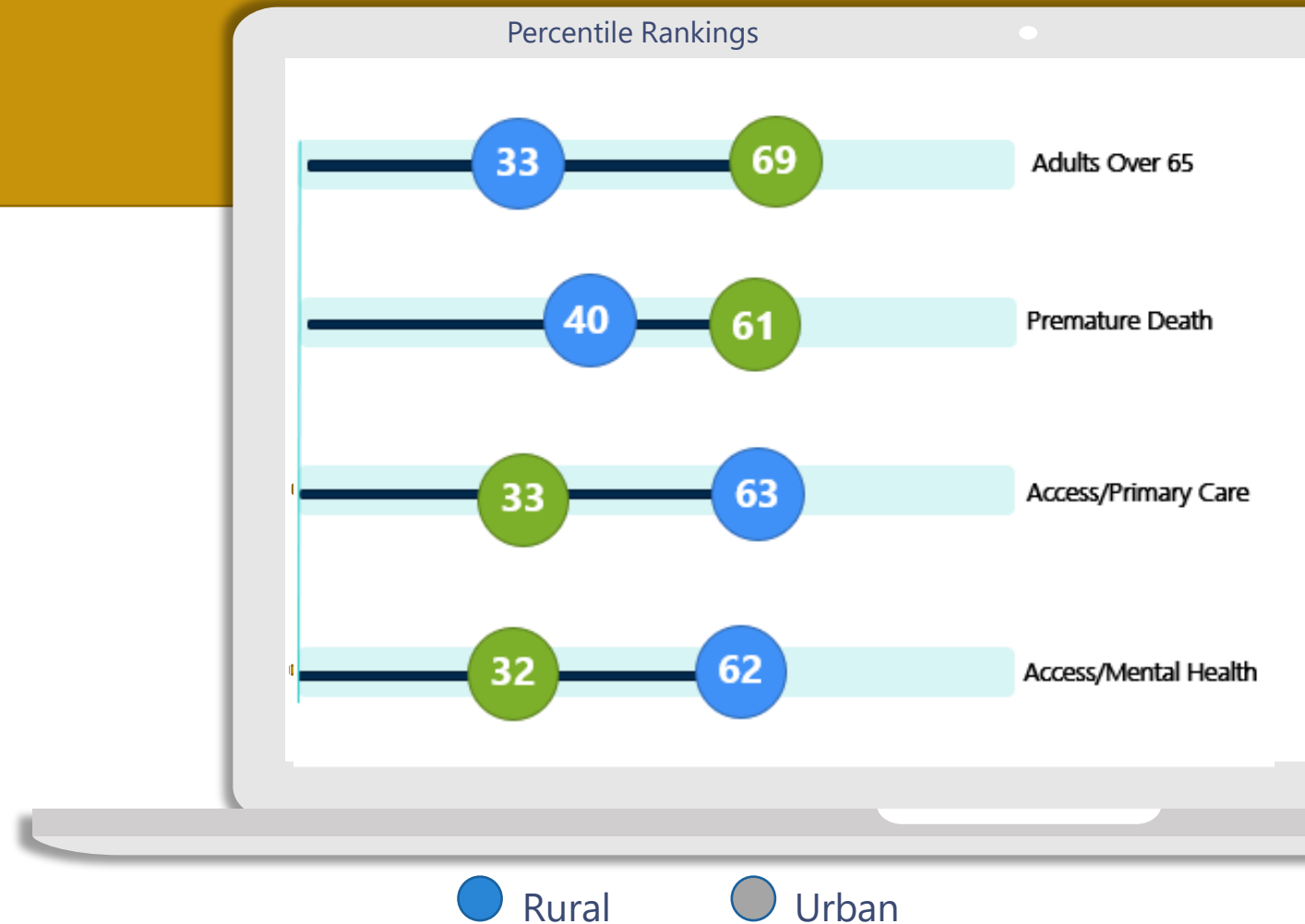
An exchange between urban and rural that must not be overlooked

Historically, public policy has disadvantaged health care in rural communities

The Rural / Urban Divide

Health Disparities **widen** during Pandemic

Rural populations are older, poorer, sicker, have less access to care and suffer worse outcomes than their more urban peers.



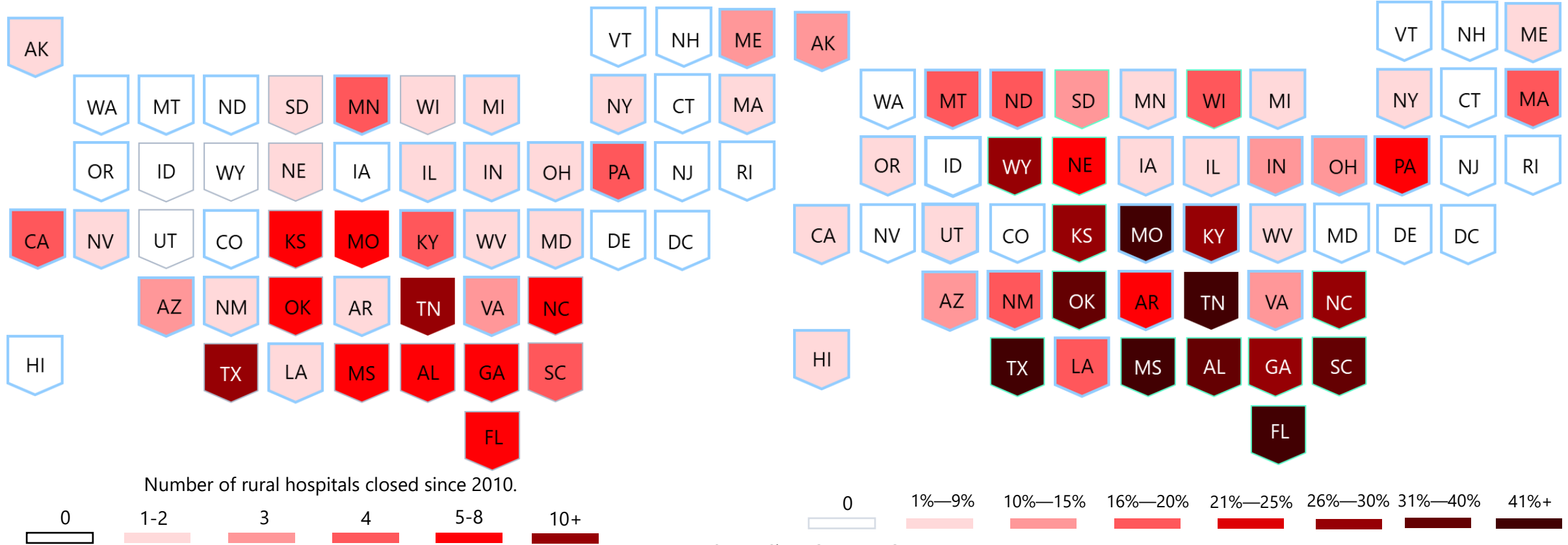
Persistent Pressure Points on Rural Providers



Rural Hospital Status

Rural Hospital Closures

Vulnerable Rural Hospital



Source: Sheps Center, UNC

Percentage of State Rural Hospitals Determined to be Vulnerable

Source: The Chartis Center for Rural Health, 2021.

What's Happening in Washington

End of PHE

- Public health emergency ended May 11, 2023.
- Most CMS 1135 blanket waivers expired
 - Some are in place until Dec. 31, 2023
- What's not affected?
 - Telehealth – extended through Dec. 31, 2024
 - Medications for opioid use disorder – OTPs and DEA
 - COVID-19 lab tests, vaccines without cost-sharing

Debt Ceiling

- “X date” – when gov can no longer pay its bills – projected by Treasury Dept., others to be early June
- Solution?
 - Republicans want to see spending cuts and increase in borrowing limit
 - Dems would force debt ceiling increase if negotiations fail through little used rule
- Late April: House passed Limit, Save, Grow Act
- Early-mid May: White House and congressional leadership meetings
 - Speaker McCarthy, President Biden indicated deal could be made by this week

2024 President's Budget

- Key rural elements of [President's 2023 budget](#) released March 28, 2022:
 - New! Rural Health Clinic behavioral health initiative for \$10m
 - Increases in funding for rural opioid response, rural residency development, National Health Service Corps, telehealth, and 340B
 - Level funding for most critical rural health programs (Flex, SHIP, SORH)
- Areas to continue advocating for include:
 - CDC Office of Rural Health
 - USDA Rural Hospital Technical Assistance
 - Rural maternal health through Rural MOMs authorization

FY 2024 Appropriations

NRHA FY 2024 Requests (dollars in millions)

Program	FY23	NRHA Request	PB Request
Rural Hospital Flexibility Grants	64	73	64
New! Rural Health Clinic Behavioral Health	-	10	10
Rural Maternity & Obstetrics Management Strategies Program	8	24	10
Rural Residency Planning and Development	12.5	14.5	12.7
CDC Office of Rural Health	5	10	5
Rural Hospital Technical Assistance Program	2	5	0
Rural Health Research & Policy	11	12.1	11
New! Financial and Community Sustainability for At-Risk Hospitals	-	10	10
Rural Communities Opioid Response	145	165	165
State Offices of Rural Health	12.5	18	12.5

2023 Farm Bill

- Sent Farm Bill requests letter to House and Senate Agriculture Committee leadership in March
- Requests include:
 - Addressing hospital capital, capacity building
 - Supporting Farm and Ranch Stress Assistance Network (FRSAN), new farmer crisis hotline
 - Developing farmer and agriculture worker crisis hotline
 - Supporting and increasing funding for nutrition programs like SNAP, Food Distribution Program on Indian Reservations, Healthy Food Financing Initiative, and GusNIP

Support the Rural Health Infrastructure

- Support the rural safety net hospitals
 - [HR833 Save America's Rural Hospitals Act](#)
 - [HR1565 Critical Access Hospital Relief Act](#)
 - [S803: Save Rural Hospitals Act of 2023](#)
 - [S. 1110: Rural Hospital Support Act of 2023](#)
- Bills in progress:
 - Reintroduction of Rural Hospital Closure Relief Act ([S644](#) in 117th)
 - Reintroduction of Hospital Revitalization Act ([S3105](#) in 117th)

Support the Rural Health Infrastructure

- Modernize the RHC program
 - [S198 Rural Health Clinic Burden Reduction Act](#)
 - Developing RHC Quality Reporting Program with enhanced payment
- Ensure the 340B Drug Pricing Program remain a viable lifeline
 - [HR 2534: PROTECT 340B Act of 2023](#)
 - Evaluating other 340b reform proposals
- Extending authorization for CHC and NHSC.
 - [HR 2559: Strengthening Community Care Act of 2023](#)

Build a Robust Rural Health Workforce

- Expand the Medicare Graduate Medical Education (GME) program
 - [S230/HR 83 Rural Physician Workforce Production Act](#)
 - [S665 Conrad State 30 and Physician Access Reauthorization Act](#)
 - [HR751 Fair Access in Residency Act](#)
- Support development and capacity of health care providers
 - [HR2761 Reintroduce Improving Care and Access to Nurses Act](#)
- Support loan repayment programs
 - [S940 Rural America Health Corps Act](#)



Address Rural Health Equity

- Expand Access to Maternal Health Services
 - [S948 Healthy Moms and Babies Act](#)
 - Reintroduction of Momnibus
- Permanently Expand Telehealth Provisions
 - Including in person payment parity for RHC and FQHC services
 - Reintroduction of CONNECT for Health Act
- Expand Access to Emergency Medical Services (EMS)
- Support Rural Public Health Capacity
 - Reauthorize and increase funding for new CDC Office of Rural Health

Rural Health Issues We're Tracking

- Rural Healthcare Workforce Shortages
- Rural Hospital Viability
- Rural Health Clinic Modernization
- 340B Program Lifeline
- Telehealth in Rural
- Rural Maternal Health
- Medicare Advantage in Rural
- Rural Health Innovation
- Rural Emergency Hospital (REH) Model
- ...And Others!!!!



Rules, Rules, Rules...

Current Regulatory Activities

- CMS released the [Inpatient Prospective Payment System \(IPPS\)](#) proposed rule. Comments are due June 9, 2022.
 - Key proposals include:
 - Overall, 2.8% payment increase, 3.3% for rural hospitals
 - REHs can be nonprovider sites for GME
 - Wage index calculation change
 - Requests for info/comment: safety net hospitals, geriatric measures & hospital designation
- CMS released the [Skilled Nursing Facilities \(SNF\) PPS](#) proposed rule. Comments are due June 6, 2022.
 - Key proposals include:
 - 3.7%, or \$1.2 billion, increase in payments
 - Health equity adjustment in SNF Value-Based Purchasing Program
 - Streamlined procedure for SNFs facing civil monetary penalties
 - Does not include minimum staffing levels; in future proposed rule

Current Regulatory Activities

- [Ensuring Access to Medicaid Services](#) proposed rule. Comments due July 3
 - Key proposals include:
 - Medicaid Advisory Committee & Beneficiary Advisory Group
 - Changes to section 1915(c) Home and Community Based Services waivers
 - Access Monitoring Review Plans – states must publish FFS rates
- [Medicaid and CHIP Managed Care Access, Finance, and Quality](#) proposed rule. Comments due July 3
 - Key proposals include:
 - Enrollee services & secret shopper services for MCO compliance
 - Appt. wait times for mental health/SUD, primary care, OBGYN
 - Payment and price transparency

Current Regulatory Activities

- CY 2024 Medicare Advantage final rule released
 - Most provisions finalized as proposed, including those on prior authorization:
 - PA may only be used to confirm presence of diagnosis or determine medical necessity
 - MA plans must comply with general coverage and benefit conditions in traditional Medicare
 - Once an item/service is approved as medically necessary, MA plan cannot later revise its necessity determination
 - Some changes in behavioral health-related provisions
 - MA plans not required to identify MOUD providers in directories
 - MOUD providers not subject to network adequacy requirements

Current Regulatory Activities

- Drug Enforcement Administration [temporary rule](#) on prescribing controlled substances via telemedicine
 - Includes buprenorphine
 - Extending PHE flexibilities through Nov. 11, 2023
 - Patients that established a telemedicine before Nov. 11, 2023, maintain flexibilities through Nov. 11, 2024
 - DEA will pursue further rulemaking for final policy
- Different from [proposed rule on opioid treatment programs](#) from SAMHSA
 - No final rule yet
 - More flexible

Executive Branch Communications

- CMS interim [guidance](#) for RHCs re: “urbanized area” definition
 - Using 2010 and 2020 Census for eligibility determinations
- [Hospital transparency enforcement update](#)
 - CMS will not issue a warning for hospitals that have not begun to comply, will move to request corrective action plan (CAP)
 - Hospitals must comply with plan within 90 days of receiving CAP request
 - Automatically imposing CMP for hospitals that do not submit CAP by deadline or do not comply within 90 days

Advocate With Us!

Current Advocacy Campaigns

**Urge Congress to Invest in
Rural Health**

**Urge Congress to Invest in a
Robust Rural Health
Workforce**

**Urge Congress to Reduce
Burden in Rural Health Clinics**

**Urge Congress to Invest in Rural
Communities in Farm Bill 2023**

NRHA's Legislative Tracker

Legislative Tracker

NRHA is tracking rural health legislation in Congress to advance quality of life across rural America.

NRHA's legislative tracker enables you to view the rural health bills in Congress the association is monitoring, including those we endorse and oppose. Bills are searchable and categorized by topic area. By clicking on a bill, you can find its summary, review cosponsors, and stay up to date on congressional actions.

Through activities such as NRHA's annual **Rural Health Policy Institute** and **ongoing grassroots campaigns**, NRHA members actively participate in advocacy efforts to advance needed rural health legislation.

For further information or to recommend bills for the legislative tracker, **contact NRHA's government affairs team**.

Find Legislation

Federal

Hospitals & Health Systems

[H.R. 833: Save America's Rural Hospitals Act](#) | 2023-2024 Regular Session (118th) ✓

[H.R. 1712: Rural Health Innovation Act of 2023](#) | 2023-2024 Regular Session (118th) ✓

[H.R. 2423: To affirm that the Farm Credit Administration is the sole and independent regulator of the Farm Credit System.](#) | 2023-2024 Regular Session (118th) ✓

[HR 1565: Critical Access Hospital Relief Act of 2023](#) | 2023-2024 Regular Session (118th) ✓

[S. 803: Save Rural Hospitals Act of 2023](#) | 2023-2024 Regular Session (118th) ✓

[S. 1110: Rural Hospital Support Act of 2023](#) | 2023-2024 Regular Session (118th) ✓

NRHA Advocacy 101 Guide

Sharing your perspective and expertise is vital to help your elected officials understand and address the issues impacting your community!

- Advocacy 101: [Your guide to advocate for rural health change](#)
- Appendix A: [Sample invitation letter](#)
- Appendix B: [Sample media advisory](#)
- Appendix C: [Sample thank you letter](#)
- Appendix D: [NRHA's 'what we do' one-pager](#)

https://www.ruralhealth.us/NRHA/media/Emerge_NRHA/PDFs/Advocacy-Guide-FINAL.pdf



2023 NRHA Materials

Access our policy resources!!!!

[Policy Leave Behinds](#)

[Policy Agenda](#)

[Policy Papers](#)

National Rural Health Association Position Paper



Maternity Care in Rural America

Policy Solutions

Improving maternal health outcomes across the United States is critical, especially in rural areas. The closure of rural maternal health programs is a multi-faceted problem that requires various approaches and potential solutions, including:

- Provide adequate Medicaid coverage and provider payment
 - Incentivize the expansion of Medicaid eligibility to cover pregnant women with income below 138 percent of the federal poverty level, as well as full-year post-partum coverage
 - Establish alternative payment models for obstetrics and delivery, such as pay for performance and value-based payment models
 - Finance infrastructure to increase rural obstetric facilities, equipment, and maternal health providers
 - Expand telehealth access and reimbursement to help connect specialty OB providers with rural practitioners

Grassroots Calls

MAY 31, 2023

NRHA

Grassroots Call

May 2023



CARRIE COCHRAN-MCCLAIN
CHIEF POLICY OFFICER

ALEXA MCKINLEY
REGULATORY AFFAIRS MANAGER

GRACE GIRARD
GRASSROOTS AND COMMUNICATIONS COORDINATOR

KRISTEN BATSTONE
GOVERNMENT AFFAIRS AND POLICY COORDINATOR

The next grassroots call will be held on **Wednesday, May 31, 2023, at 2 PM ET.** [Register in advance for this meeting.](#)



The Rural Roundup

The Rural Roundup is a weekly newsletter created by the Advocacy team at [National Rural Health Association](#).

Every Friday our team will bring you the most important news from Washington, D.C. We'll break down recent developments on the issues you care about and how we are supporting rural America.

Sign up to receive [NRHA's Rural Roundup](#) & [NRHA Today](#)

2023 NRHA Other Advocacy Goodies

Engage with NRHA Advocacy online!

- [Twitter](#)
- [Facebook](#)
- [LinkedIn](#)
- [Instagram](#)

Contact your NRHA Government Affairs Team

[Carrie Cochran-McClain](#)

[Alexa McKinley](#)

[Zach Schulz](#)

[Kristen Batstone](#)

[Grace Girard](#)



NRHA Advocacy 

@NRHA_Advocacy

Comments? Questions?



NRHA

Your voice. Louder.

ccochran@ruralhealth.us

amckinley@ruralhealth.us