

Critical Access Hospitals

AND THEIR ROLE IN RURAL HEALTHCARE

Objectives



- 1) Summarize the origins and history of Critical Access Hospitals in the United States
- 2) Differentiate between the levels of care and services provided by Critical Access Hospitals and larger hospital systems
- 3) Discuss the challenges faced by Critical Access Hospitals in today's economic climate

*We have no financial conflicts of interest to disclose.

The Not-So-Long and Storied History of Critical Access Hospitals in the US

1946

Congress passes the Hill-Burton Act → federal funding for construction of hospitals, even in rural areas.

1982

New legislation allows CMS to reimburse hospitals using flat-rate payments (PPS) → birth of DRGs.

1980s
-90s

550 hospitals close, 200+ of them in rural areas.

1997

Congress passes the Balanced Budget Act → creates the CAH designation.

Goals of the CAH Designation



- 1) Preserve healthcare access by keeping essential healthcare services in rural communities
 - ▶ *What are the possible benefits of this for rural communities?*
 - ▶ *Individual/family benefit: Reduced need for travel to urban areas (more savings), increased property values, personal connection*
 - ▶ *Community benefit: Keep healthcare dollars in community, job creation*
- 2) Put financial safeguards in place to protect rural hospitals from additional closures.

What *is* a Critical Access Hospital?

- ▶ Designation given to certain rural hospitals by CMS
- ▶ Must meet the following criteria:
 - Participate in the Medicare program
 - ≤25 acute beds that can also be used as swing beds
 - Annual average acute-care length of stay <96hrs
 - 24-hour emergency services, 7 days a week
 - Must be located:
 - ❖ >35mi drive from the nearest hospital, OR
 - ❖ >15mi drive from another hospital if on mountainous or 2° roads, OR
 - ❖ Certified as a “Necessary Provider” by the state prior to 2006

Staffing Requirements

- ▶ ≥ 1 MD/DO and 1 RN
- ▶ Must provide the following:
 - Patient activities
 - Social services
 - Comprehensive care plan
 - Discharge-planning services
 - Specialized rehabilitation
 - Dental services
 - Nutrition care



Levels of Care/Services Provided

Inpatient

- ▶ Acute care (med/surg)
- ▶ ICU beds
- ▶ Skilled (SNF) care
- ▶ Observation status
- ▶ Acute hospice
- ▶ Respite care/private pay
- ▶ Obstetrics
- ▶ Respiratory therapy
- ▶ Pharmacy

Outpatient

- ▶ Clinic visits (including telehealth)
- ▶ Specialty clinic visits
- ▶ ER services/ambulance service/helicopter
- ▶ Ambulatory surgery
- ▶ Cardiac stress tests
- ▶ Radiology/imaging
- ▶ Electrodiagnostic tests
- ▶ Lab services
- ▶ PT/OT/speech & cardiac/pulmonary rehab
- ▶ Health coaching/dietetics
- ▶ Sleep studies
- ▶ Dialysis
- ▶ Wound care
- ▶ IV infusions

Admissions Criteria

Acute Care

- ▶ Physician certification:
 - IP stay is medically necessary
 - Expected hospitalization for ≥ 2 midnights
 - Either D/C or transfer within 96hrs
- ▶ Estimated length of stay
- ▶ Recommendations for any post-acute care

Skilled Care (SNF)

- ▶ Must have had a 3-midnight "qualifying stay" in acute care (waived during COVID-19)
- ▶ Need daily skilled care:
 - Nursing/IV antibiotics
 - PT
 - OT
 - Speech

Pop quiz: Would a hospital stay in Observation Status count towards the 3-midnight "qualifying stay"?

Suzie's Story: How Critical Access Hospitals Coordinate Care

- ▶ Diagnosis: Congenital hydrocephalus, holoprosencephaly
- ▶ Underwent 3 shunt placements/revisions throughout her life, with the most recent in May 2019
- ▶ Required intensive care to return to baseline, necessitating PT, OT, and speech pathology services
- ▶ Therapy plan of care set by ChildServe
- ▶ Medical care overseen by UIHC
- ▶ Individualized care provided locally by her hometown critical access hospital
- ▶ Seen frequently in the ER, with transfers to e-ICU and UIHC arranged as needed

Challenges Facing CAHs

Recruiting Challenges

- Limited “home-grown talent”
- Visiting specialists → decreased access to care

Sustainability Challenges

- Small population
- Turnover
- Minimal market competition

Financial Liabilities

- Staff your own department vs.
- Hire contract services

Practice Trends and Contemporary Issues in CAHs

- ▶ Affiliations with larger hospital systems
- ▶ Access issues: Broadband internet availability
- ▶ Community engagement
- ▶ Fitness/wellness: Medically-oriented gyms
- ▶ Partnerships with local schools
- ▶ Addressing the opioid epidemic



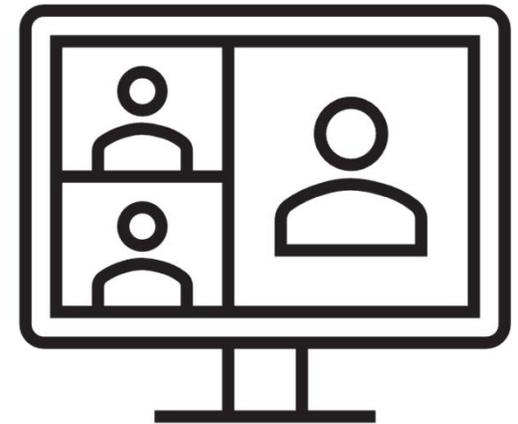
Incredibly Common Myths About Rural Healthcare and CAHs

- ▶ Myth #1: “You must only treat farmers and cowboys or little old ladies.”
- ▶ Myth #2: “Healthcare providers in rural settings must be nearing retirement and be out-of-date/out of touch.”
- ▶ Myth #3: “You’d make more money working in a bigger city.”
- ▶ Myth #4: “You must not be very busy.”
- ▶ Myth #5: “Must be nice to have a local hospital that’s just down the street.”
- ▶ Myth #6: “Do they even have electricity there?”

Telehealth: The New Post-COVID19 Frontier

- ▶ Bridging the gap in care: Do not qualify for home health services but cannot or do not want to travel for outpatient services
- ▶ Telemedicine or telerehabilitation may be used for “maintenance care” to manage certain long-term or chronic conditions.
- ▶ Has been shown to improve patient outcomes satisfactorily and be financially feasible

Yeroushalmi S, Maloni H, Costello K, Wallin MT. Telemedicine and multiple sclerosis: a comprehensive literature review. *J Telemed Telecare*. Aug-Sep 2020;26(7-8):400-413. doi: 10.1177/1357633X19840097.
Khan F, Amatya B, Kesselring J, Galea M. Telerehabilitation for persons with multiple sclerosis. *Cochrane Database Sys Rev*. 2015 April 9;2015(4):CD010508. doi: 10.1002/14651858.CD010508.pub2.



Telehealth: How Does It Work?



- ▶ Use a secure (encrypted) platform to ensure patient privacy
- ▶ Patients may prefer to use a non-encrypted platform based on their own preferences
- ▶ Document patient acknowledgement of the lack of encryption and security with using particular platforms
- ▶ Document: Patient initiated the visit, what platform was used, and where practitioner/patient are for the duration of the call
- ▶ Certain CPT codes (e.g. manual therapy) not reimbursable
- ▶ Billing remains the same, but must change location of service



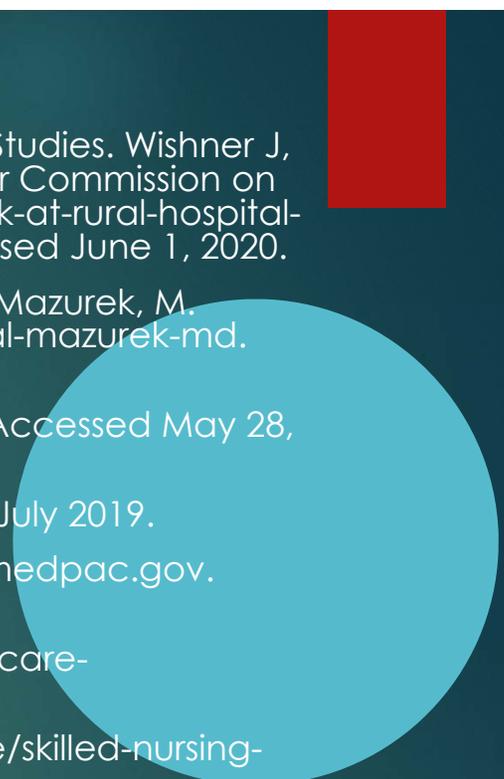
Telehealth: What Does It Look Like?



Telehealth: What Does It Look Like?

“So what’s this got to do with me?”: The roles of providers in urban and metropolitan settings

- ▶ Recognize that the world has enough space for both generalists and specialists, and there are multiple points of entry into the healthcare system.
- ▶ Know that there’s no such thing as over-communication:
 - ▶ Clearly state your role
 - ▶ Communicate directly when possible
 - ▶ Ask “How can I help?” & SPEAK UP
- ▶ Respect others and do not over-step your professional practice act.
- ▶ Advocate for greater access to care

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- ▶ A Look at Rural Hospital Closures and Implications for Access to Care: Three Case Studies. Wishner J, Solleveld P, Rudowitz R, Paradise J, Antonisse L. Kaiser Family Foundation. The Kaiser Commission on Medicaid and the Uninsured. July 7, 2016. <https://www.kff.org/report-section/a-look-at-rural-hospital-closures-and-implications-for-access-to-care-three-case-studies-issue-brief/>. Accessed June 1, 2020.
 - ▶ Hospital Closures: A continued trend since the 1980's and the rural crisis in access. Mazurek, M. <https://www.linkedin.com/pulse/hospital-closures-continued-trend-since-1980s-rural-mazurek-md>. Accessed June 1, 2020.
 - ▶ Rural Health Information Hub. [Ruralhealthinfo.org/topics/critical-access-hospitals](https://ruralhealthinfo.org/topics/critical-access-hospitals). Accessed May 28, 2020.
 - ▶ CMS. Medicare Learning Network. Critical Access Hospital. MLM006400. Published July 2019.
 - ▶ Critical Access Hospitals Payment System. MEDPAC. Revised October 2019. www.medpac.gov. Accessed June 1, 2020.
 - ▶ Care Coordination Division/Social Services. The University of Iowa. <https://uihc.org/care-coordination-divisionsocial-services>. Accessed June 3, 2020.
 - ▶ Skilled Nursing Facility (SNF) Care. Medicare. <https://www.medicare.gov/coverage/skilled-nursing-facility-snf-care>. Accessed June , 2020.
 - ▶ News from NEXT: Rural Health Care has Plenty of Challenges, Promising Opportunities. Published June 26, 2019. <https://www.apta.org/PTinMotion/News/2019/06/26/NEXT2019RuralHealthCare/>. Accessed May 30, 2020.
 - ▶ American Speech-Language-Hearing Association. Medicare Prospective Payment Systems (PPS). https://www.asha.org/practice/reimbursement/medicare/pps_sum/. Accessed June 1, 2020.