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PHE END COUNTDOWN SERIES: Regulatory Reimbursement Focus

April 20, 2023



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MEET THE PRESENTERS



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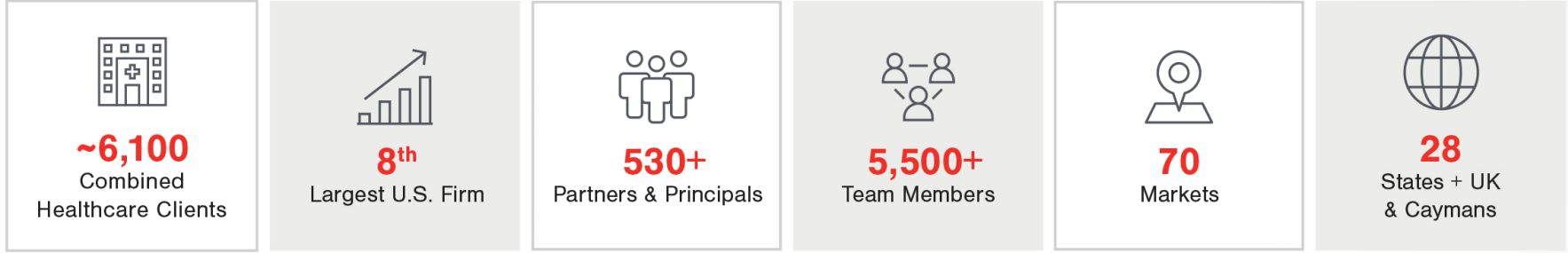
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FORVIS OVERVIEW

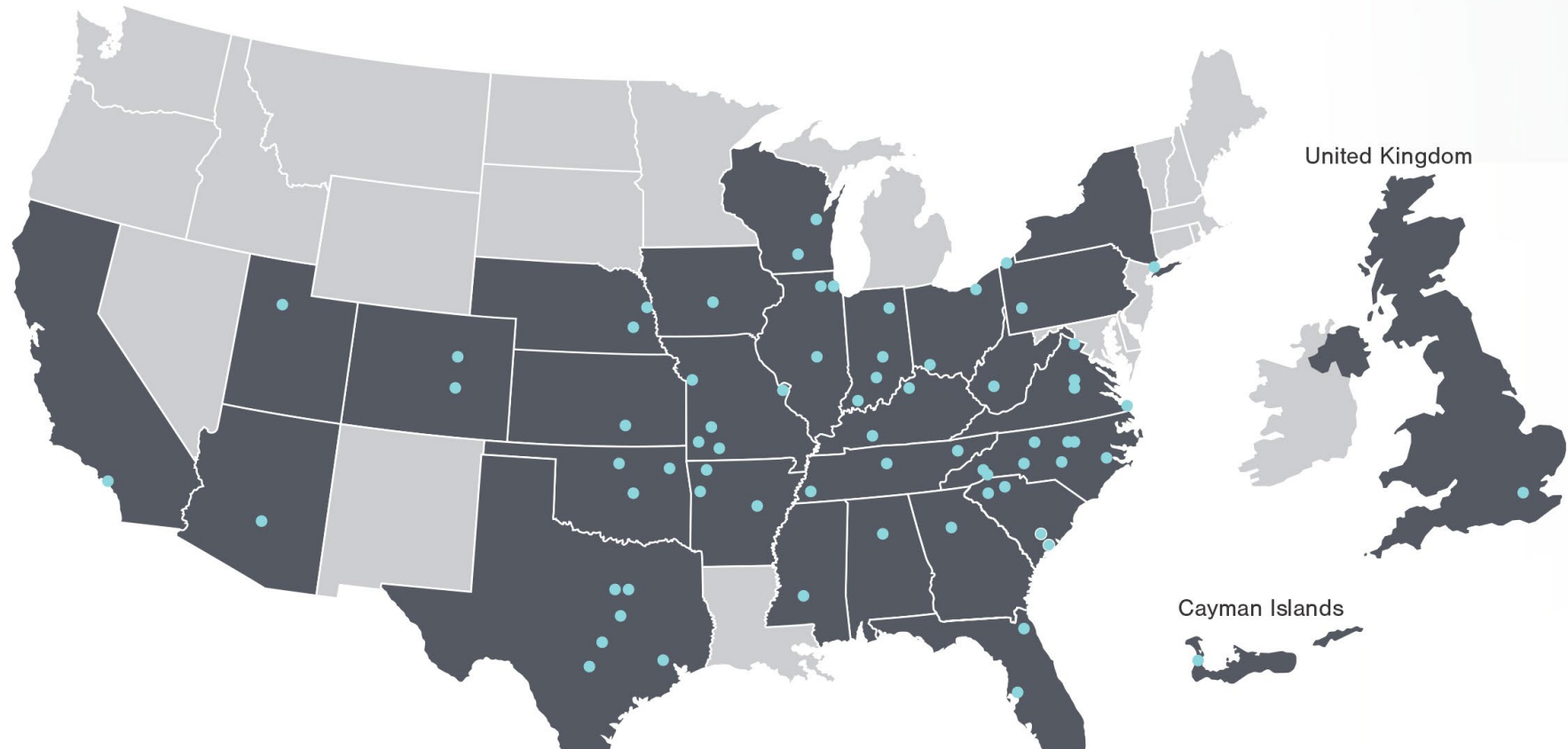
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A National Footprint



FORVIS' HEALTHCARE PRACTICE

FORVIS Knows Healthcare

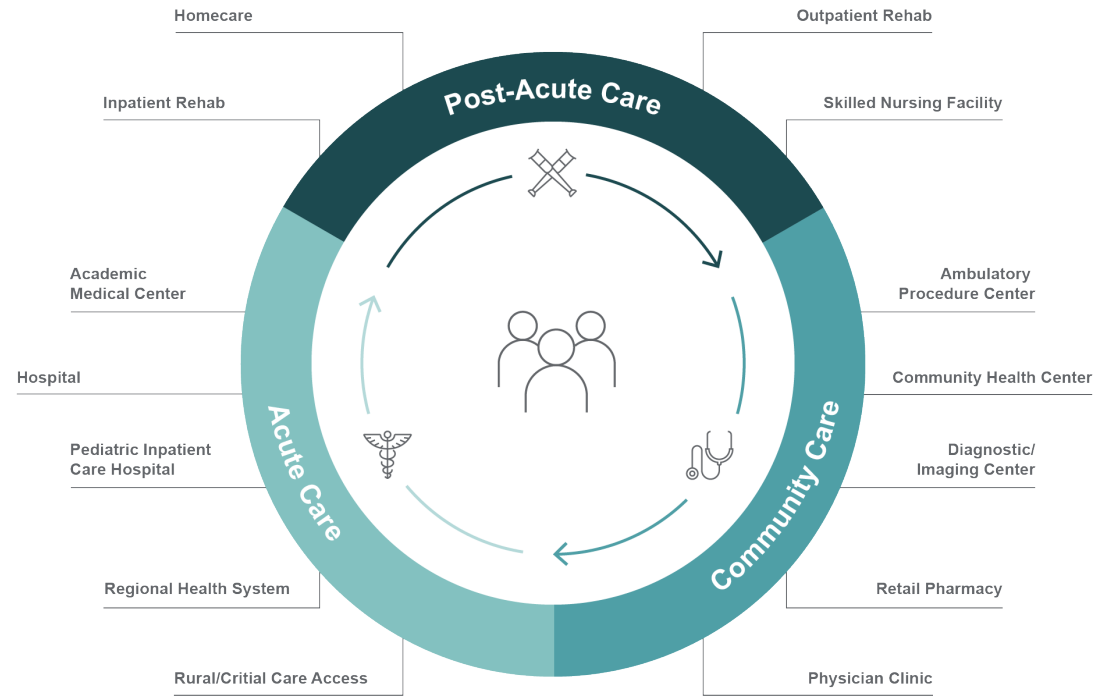
950+
team members

6100+
healthcare clients

175+
PPMDDs

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Serving the Entire Continuum of Care



**Modern
Healthcare**

90

Healthcare Net Promoter Score



9th

Largest Healthcare Consulting Firm



2nd

Largest Healthcare Auditor

2nd

Largest Healthcare Tax Preparer

Sources: UCX survey NPS score; Modern Healthcare's Largest Management Consulting Firms 2022 ranking; OMB data via the Federal Audit Clearinghouse based on HHS CFDA's for number of Single Audits performed; and Cause IQ based on Form 990s for nonprofit healthcare providers

AGENDA

- Overview of PHE Ending
- Impact on Hospitals & Health Systems
- Impact on Rural Health Clinics
- Inpatient/Home Care Impact
- Cost Reporting Timelines

PHE EXPIRATION – REIMBURSEMENT CONSIDERATIONS

PHE Declaration Expected to Expire on May 11, 2023

Significant Shift in Insurance Coverage Anticipated

- Medicaid Revalidation Process Restarted on April 1, 2023
- Enhanced ACA Marketplace Exchange Subsidies in Place Through 2025
- Certain COBRA Elections Expiring

PHE EXPIRATION – REIMBURSEMENT CONSIDERATIONS

**Medicaid
Revalidation
Process
Restarted
on April 1,
2023**

- Anticipated Impact on Collections
- Additional Burden on Business Office Teams
- Hospital 340B Threshold Considerations

PHE EXPIRATION – REIMBURSEMENT CONSIDERATIONS

**Enhanced
ACA
Marketplace
Exchange
Subsidies
in Place
Through
2025**

- Patient Responsibility Collection Considerations

PHE EXPIRATION – REIMBURSEMENT CONSIDERATIONS

SIGNIFICANT IMPACTS MAY OCCUR



**Hospitals & Health
Systems**



Physician Services



Post-Acute Care

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PHE EXPIRATION – REIMBURSEMENT CONSIDERATIONS



Hospitals & Health Systems

- 20% Increase in Reimbursement for COVID Claims Expires as of End of PHE
- Inpatient – New COVID-19 Treatments Add-On Payment (NCTAP) Expires as of December 31, 2023
- Outpatient – APC Bundling of New COVID-19 Treatments Will Begin After PHE Expires



Hospitals & Health Systems

- Medicare-Dependent Hospital (MDH) Criteria
 - Available Bed & Medicare % Calculations
- Sole Community Hospital (SCH) Mileage Criteria
- Critical Access Hospital (CAH) Criteria
 - Available Bed, ALOS Calculations, & Location Criteria
- SCH & MDH Should Reconsider if Volume Decline Adjustment Request Is Applicable



Hospitals & Health Systems

- Teaching Hospitals
 - Intern to Available Bed Calculations
 - Considerations for Resident Time at Alternative Locations or Other Hospitals
 - Psych & Rehab Teaching Adjustments Have Been Protected During PHE, but Will Resume Historical Approach After PHE Ends

PHE EXPIRATION – REIMBURSEMENT CONSIDERATIONS



Value & Quality Reimbursement Factors

- Anticipation That Value-Based Purchasing Factors Will Resume Along With Reporting Requirement for All Data Elements



Hospitals & Health Systems

- Provider-Based Departments
 - Relocation Exception Requests Expire at End of PHE
 - Return to Previous Location Is Necessary to Maintain On-Campus or Excepted Status Unless Extraordinary Circumstance Relocation Approval Is Received – Likely Rare



Rural Health Clinics

PHE EXPIRATION – REIMBURSEMENT CONSIDERATIONS

- Hospital Available Bed Counts for Hospital-Based RHCs Receiving Cost-Based Reimbursement
- PA/NP Staffing Flexibility Expires at End of PHE
- Reconsider if RHC Productivity Exception Requests Are Needed for Cost Report Periods During PHE

**PHE EXPIRATION –
REIMBURSEMENT
CONSIDERATIONS**



Community Mental Health Center (CMHC)

- **Waiver of Regulation That At Least 40% of Services Be Provided to Non-Medicare Patients Expires at End of PHE**



Long-Term Care

- Swing Bed Flexibilities Expiring
- Three-Day Qualifying Stay Criteria Resumes at End of PHE
- Many Waivers Already Terminated Earlier in PHE



Home Care

- Waiver for OASIS Submission Flexibility Expires at End of PHE



Inpatient Rehabilitation

- Certain Flexibilities Regarding 60% Rule Expire at End of PHE
- Waiver for Intensity of Therapy Rule Expires at End of PHE

COST REPORTING TIMELINES

Expectation of Reduced Flexibility for Cost Report Extensions Beyond Five-Month Deadline

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Q&A



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PHE End Countdown Series

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