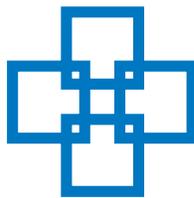


# Work Plan

July 1, 2018 - June 30, 2019



**Kentucky  
Hospital  
Association**

*Representing  
Kentucky  
Health Care  
Organizations*

# 2018-2019 KHA Work Plan

Each year, KHA's Strategic Planning Committee meets to review the accomplishments of the previous year and discuss initiatives for the upcoming year. The Committee then prioritizes these activities and develops a list of recommendations to present to the KHA Board of Trustees. The list of initiatives included in this Work Plan was approved by the KHA Board in its June 2018 meeting. New state and federal issues may arise that take priority over these listed; however, this plan identifies the major initiatives the KHA staff will undertake before June 2019.

Your participation is a key element to the success of this Work Plan. I hope you will be able to participate in our key initiatives that were developed to support the quality care Kentucky's hospitals deliver each day.

Please feel free to call me if you have questions. On behalf of the entire KHA Staff, we are looking forward to working with you in the months ahead.



Michael T. Rust, FACHE  
President

## Federal Initiatives

### Medicare

- Oppose any Medicare cuts
- Provide hospital-specific analysis of:
  - Medicare cuts in place and under consideration
  - Payment rule impacts
  - Quality payment program impacts
  - Bundled payment programs

### Medicaid DSH Cuts

- Support repeal of Disproportionate Share Hospital (DSH) cuts; or
- Support amendment of Affordable Care Act (ACA) to mitigate cuts to Kentucky
- Provide hospital-specific analysis of:
  - DSH payment impacts

### Medicaid Reform

- Preserve Medicaid expansion and enhanced federal funding as Kentucky's 1115 waiver is predicated

on continuation of the enhanced match

- Establish a fair baseline for Kentucky spending limits if funding is limited under a per capita cap or block grant to enable incorporation of UPL supplemental payments

### 340B Drug Discount Program

- Preserve the 340B Program
  - Support HR 4392 to reverse the 340B cuts implemented in the Centers for Medicare and Medicaid Services (CMS) Outpatient Prospective Payment System (OPPS) final rule
  - Oppose legislation which would scale back and expand the regulatory burden of the 340B program

### Medicare Area Wage Index (AWI)

- Work with coalition of states to fix the "Bay State Boondoggle," returning to state budget neutrality for the rural floor
- Work with coalition of states to enact long-term correction to widen-

ing gap between high and low AWI states by setting ceiling and floor

### Critical Access Hospitals (CAHs)

- Remove the 96-hour physician certification requirement as a condition of payment
- Maintain cost-based reimbursement for CAHs at 101% of cost
- Reject proposals to limit designations or decertify based on mileage
- Seek policy changes to allow CAH swing bed programs to be competitive in Accountable Care Organizations (ACOs) and bundled payment initiatives

### Additional Federal Initiatives

- Create exception safe harbors and waivers under the anti-kickback law to protect clinical integration
- Revise "Stark law" so physicians and hospitals can work together to improve care
- Seek ability for post-acute providers (IRF, LTACH and CAH) to negotiate Medicare payments to participate in Alternative Payment

Models (APMs), and disregard the 60% IRF rule

- Repeal of the Institutions for Mental Disease (IMD) Limit
  - Assure that Medicaid funding for IMD services is provided at the same state match rate as for other Medicaid covered services

## State Initiatives

### Medicaid

- Continue waiver workgroup through implementation and collaborate with other organizations on premium payment
- Work with the Department of Medicaid Services (DMS) on DSH revision implementation
- Work with DMS on implementation of substance abuse disorder portion of the 1115 waiver and IMD Payment
- Complete project/study to improve hospital payments
- Continue to advocate for reducing the number of Medicaid managed care organizations (MCOs)
- Produce MCO performance report
- Work with DMS on MCO contract changes
- Implement a KHA credentialing service

### Certificate of Need (CON)

- Work with the KHA CON Committee
  - Obtain positive changes to the State Health Plan (SHP)
- Advocate for the long-term sustainability of the Kentucky CON program

### Legislation

- Develop positions to protect hospitals on potential 2019 legislation on:
  - Personal Injury Protection (PIP) reform
  - Surprise billing
  - Health care transparency

### Additional State Initiatives

- Continue Emergency Department (ED) Quality Initiative on a voluntary basis
  - Encourage DMS to provide a quality incentive payment program if hospitals choose to participate
- Work with OIG to implement Outpatient Health Center regulation and a regulation on freestanding EDs.

### Circle of Friends

- Reach political action committee (PAC) Goals:
  - 100% of hospitals contributing to Circle Of Friends
  - \$120,000 in PAC contributions and direct-to-candidate contributions
- Present PAC checks to legislators
- Update Legislative Voting Report Card

## Member Services

### KHA Data Center

- Continue to expand KHA Data Program to provide increased value and information to support hospital risk assumption
  - Roll out reports and expand program beyond inpatient care to include Home Health and Hospice.
  - Investigate collecting NICU days by NICU level
- Collect patient identifying information in the inpatient (IP) and outpatient (OP) Claims Data, beginning in 2019
- Renew Data Contract for 2 years
- Expand Data Dashboard report to include OP report
- Renew KBSR Data Contract
- Incorporate Census/Socioeconomic indicators into current claims data
- Work with AHA on the AHA/SHA Data Collaboration for Chronic Conditions and other projects

- Hold Data Meetings after District Meetings
- Revise Return on Investment (ROI) Report for hospitals/systems
- Continue salary survey with implementation of physician salary information
- Continue workforce survey with implementation of new reporting tools
  - Plan for expansion to include hospital-based ambulatory centers and physician offices
- Expand Longitudinal Analysis Program
  - Recruit remaining hospitals who are not participating in the program
  - Include ED and Observation visits
- Promote Hospital Board Self-Assessment Tool

### Access and Telehealth

- Collect data on availability of specialty and subspecialty providers
- Collect data on telehealth capabilities
- Facilitate linkages between providers to enhance access through telehealth

### KHREF

- Continue oversight and management of KHA grant and contract activities
- Seek additional funding to support workforce and education
- Utilize workforce data to influence and fund growth of needed educational programs/tracts
- Expand education to trustees and foundation directors, and to meet identified hospital needs

### Patient Safety & Quality

- Continue Hospital Improvement Innovation Network (HIIN) initiative (extended through March 2019)
- Continue and increase Kentucky Institute for Patient Safety and

- continued -

Quality (KIPSQ) patient safety organization (PSO) work

- Join new federal efforts like HIIN or QIO work to support hospital improvement efforts
- Develop a program to recognize excellence in opioid stewardship

### Trauma Care System

- Assist the Commissioner of Public Health with support for the Kentucky Trauma Advisory Committee (KyTAC)
- Maintain a web presence for the Kentucky Trauma Care System on the KHA/KHREF website
- Assist and support future Level-IV Site Verification Surveys for new/developing trauma centers
- Support the Kentucky Trauma and Emergency Medicine Conference in Louisville planned for the fall of 2018
- Support Trauma Registrar quarterly meetings and education

### Emergency Preparedness

- Assist the state with implementation of the regular Health and

Human Services (HHS) Assistant Secretary for Preparedness and Response (ASPR) Hospital Preparedness Program (HPP) funding for 13 regional coalitions, and related state projects

- Continue to assist the state with implementation of the ASPR and Centers for Disease Control (CDC) Ebola Supplemental Funding grants; this will be the fourth year of a five-year grant program
- Work with the 13 HPP Regional Coalitions to implement their regular spending plans for fiscal year 2018-2019; and additional regional allocations of Ebola Supplemental Funding from the HPP program.
- Assist the state with implementation of hospital healthcare-associated infection (HAI) surveys/evaluations

### Member Communications

- Continue current communication methods
- Survey administrators to ensure they are receiving all information needed through these formats

### KHA Publications

- KHA Hospital Statistics (publish online)
- Hospital Economic Importance Reports
- Kentucky Community Benefits Report
- Annual Report
- KHA Work Plan
- KHA Directory
- Kentucky General Assembly & Congressional Delegation Member Handbook
- Patient Origin Reports
- Workforce Shortage and Wage & Salary Surveys
- Kentucky Pricing Website
- Kentucky Quality Website
- Kentucky Hospital Improvement Innovation Network Website
- KHA Health e-News daily blog
- Kentucky Trustee (quarterly mailer)
- Update the Value of Critical Access Hospitals (last published 2012)
- Produce a Swing Bed Value Pamphlet (new)



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