



# Say It Ain't So

What a small Critical Access Hospital in Colorado discovered when it dug through the data

**Nebraska**  
**2025 RURAL HEALTH CONFERENCE**  
YOUNES CONFERENCE CENTER NORTH | KEARNEY, NE

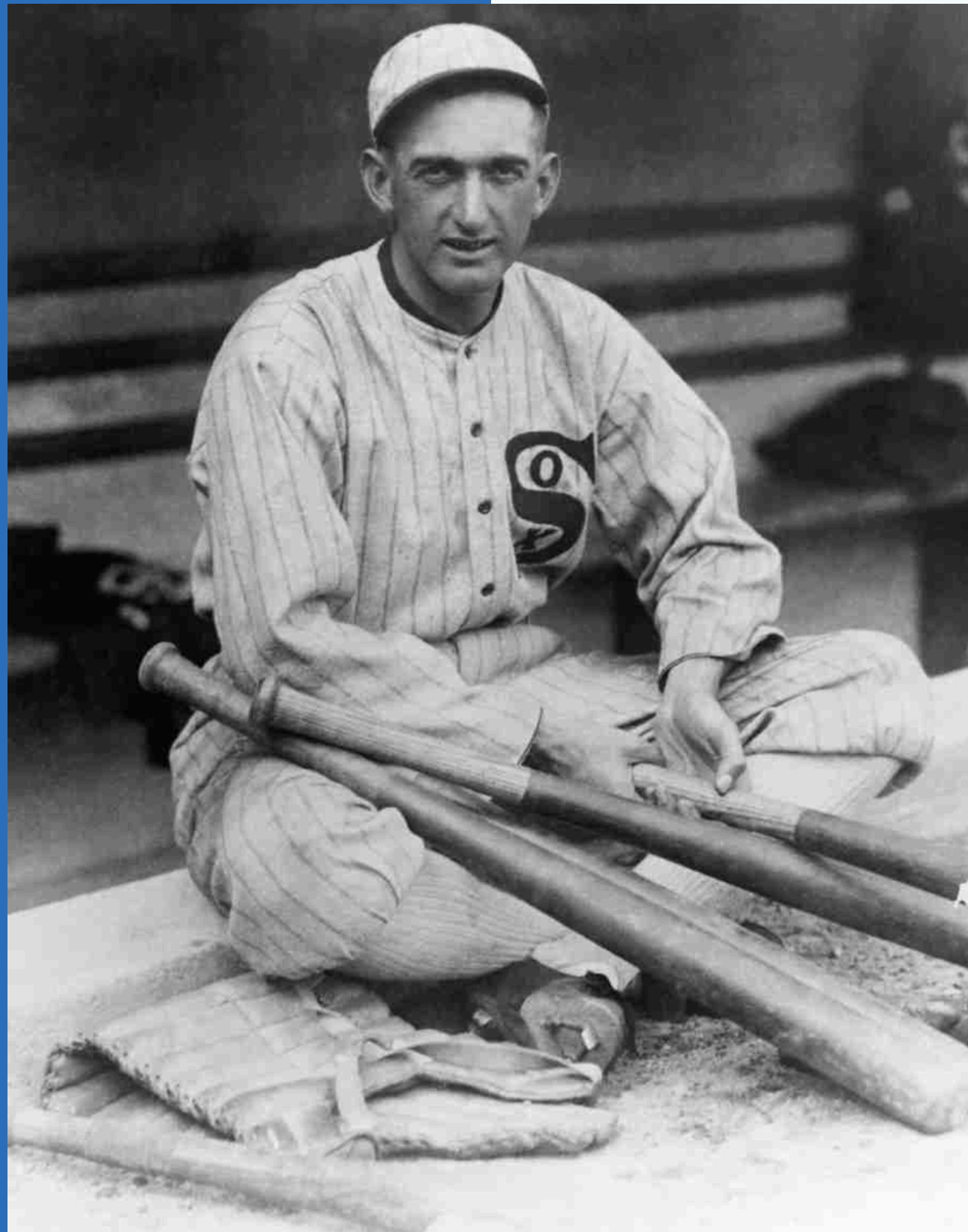
**KEVIN STANSBURY, CEO**



June 10, 2025







**Say it ain't so**

*Shoeless Joe Jackson*





# Just a skinny kid from Scottsbluff...

- Scottsbluff
- Rep. Adrian Smith
- Joel Keralis, Legislative Director at U.S. House of Representatives
- HRA







- 25-bed independent County Hospital
- The only hospital between Denver & Burlington on the I-70 Corridor
- Payer Mix
  - 50% Medicare
  - 25% Medicaid
  - 20% Commercial
  - 5% Self Pay
- Negative Operating Margins

## Scope of Services

- |                                 |                   |
|---------------------------------|-------------------|
| ✓ Hospital & Ancillary Services | ✓ Assisted Living |
| ✓ Primary Care Clinics          | ✓ Home Health     |
| ✓ Specialty Services            | ✓ Hospice         |
| ✓ Extended Care Unit            |                   |





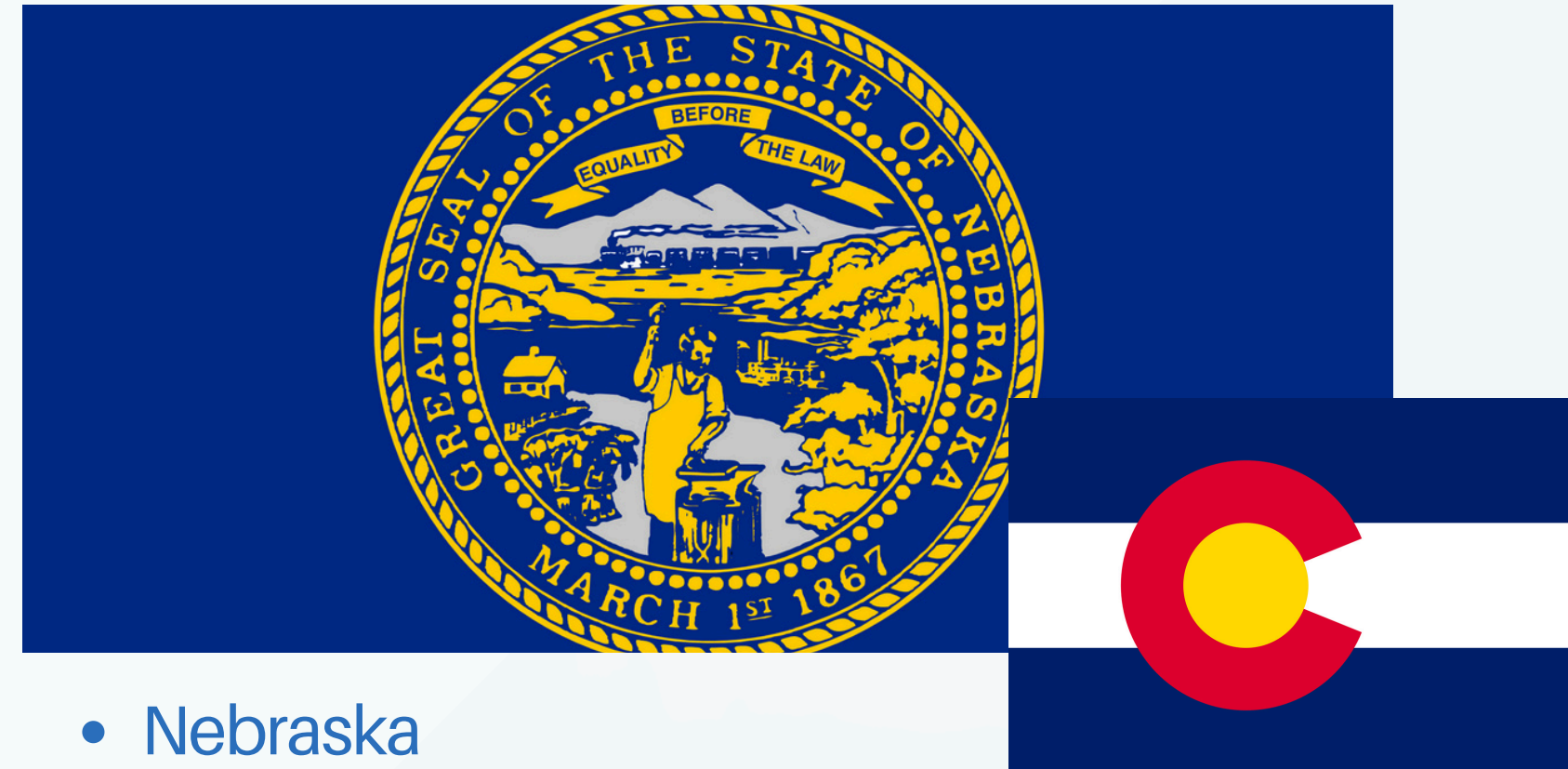
# The Rural Hospital Viability Challenge

## ✓ National Perspective



- 46% operating in the red
- 432 vulnerable to closure
- 293 ceased OB services between 2011 - 2023
- Independent hospitals perform poorer than system-affiliated hospitals.

## ✓ Nebraska & Colorado



- Nebraska
  - 54% of independent rural hospitals are operating at a loss
  - Average operating margin 1.4%
- Colorado
  - 80 % operating at an unsustainable margin
  - 48% operating at a loss





# Payer Challenges: Medicare, Medicaid, & Commercial

## *A Squeeze from Payers*



### Medicare

- Medicare Advantage: the role and impact of these plans
- Sequestration
  - Threat of additional Sequestration



### Medicaid Cuts?

- \$880 Billion
- Current House estimate apx. \$700 Billion



### Commercial Payers

- Access to plans
- Prior Authorization: A significant hurdle







Denying Your Health Care Is Big Business in America | NYT Opinion



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OPINION

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“What’s My Life Worth?”



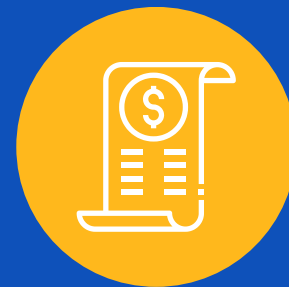
<https://youtu.be/9s3CN5EafNs?si=3zqdb9TN0xw43S2V>



# Independent Rural



“For many small rural hospitals, the leading cause of negative margins is insufficient payment from private health insurance plans and Medicare Advantage plans. Many private health insurance plans pay rural hospitals less than the cost to deliver essential services, whereas they pay large urban hospitals more than the cost of delivering services...”



Provider expenses increase by 18% while proposed rate increases have been 1% – 3%



Payer Attitude

- Not a negotiation
- “Shock & Awe” Approach

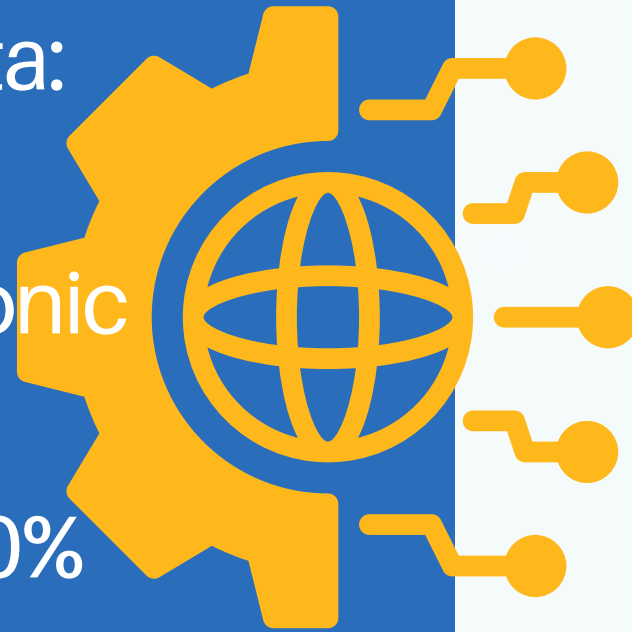


# The Value of Data: Challenges to Access

## Unlocking Insights: The Value and Challenges of Data

### Challenges to Accessing Reliable Data:

- History of HITECH Act:
  - Created incentives for Electronic Health Record Adoption
  - Prior to adoption: less than 10%
  - By 2017: 96% of hospitals EHRs.



### History of EHRs for Rural Hospitals:

- Affordability Issues
- Affordable systems often substandard
- Initial technical compliance with requirements (e.g. patient portal)
- Availability of records: often “choose the best of the worst”



# The Value of Data: Market Data & Transparency

## Leveraging Market Data and Transparency Regulations



### Market Data: Garbage In/ Garbage Out

- Nebraska Data Depositories
  - Nebraska Hospital Association Data Bank
  - Partnership with UNMC
- Colorado Examples:
  - APCDB (All Payer Claims Database)
  - OHDIN (Office of Health Data and Information)



Data and Information



### Transparency Requirements

- Gross Charges
- Discounted Cash Prices
- Charges negotiated between hospital & third-party payers.
- Available in a single machine-readable file
- Consumer-friendly display of standard charges for 70 CMS specified services
- Role of price estimators



### Federal Mandates

- Focus on *actual prices*, not just estimates.
- Consideration of “Burden v. Benefit” in data availability.



What we  
Discovered

# UNCOMPENSATED CARE BY PAYER CLASS



Payer	Total Charges	Contractual Write -Off	% Adjustment
Commercial Payer A	\$ 3,127,167	\$ (1,976,713)	63%
Commercial Payer B	\$ 5,166,447	\$ (1,697,422)	33%
Medicaid	\$ 6,198,638	\$ (1,385,917)	22%
Medicare	\$ 13,918,114	\$ (4,614,997)	33%
Medicare Advantage	\$ 3,970,042	\$ (1,667,817)	42%
Other	\$ 1,097,334	\$ (573,965)	52%
Self Pay	\$ 1,333,066	\$ (923,126)	69%
Grand Total	\$ 34,810,809	\$ (12,839,956)	37%





## Emergency Room Benchmarks

Facility Name	Critical Care	ER Level V	ER Level VI	ER Level III	ER Level II	ER Level I
All	\$9,800	\$4,800	\$2,700	\$1,300	\$1,600	\$800
Lincoln	\$1,700	\$1,300	\$1,100	\$700	\$400	N/A
Proposed Cap on Case Rate	\$4,800	\$2,100	\$1,760	\$1,480	\$1,250	\$850
Peer Group	\$10,100	\$4,900	\$2,700	\$1,300	\$1,600	\$800



# OVERVIEW- Payer Provided Comparative Analysis



	OP- Surgery		OP- ER/Urgent		OP- Radiology		OP- Laboratory		OP- Drugs	
Facility Name	Alwd/Case	Cases	Alwd/Case	Cases	Alwd/Case	Cases	Alwd/Case	Cases	Alwd/Case	Cases
All	\$7,700	5,800	\$2,500	14,600	\$800	22,300	\$70	140,200	\$28	269,200
Lincoln Health	\$3,700	100	\$1,000	200	\$400	300	\$8	3,500	\$7	1,800
Peer Group	\$7,700	5,700	\$2,500	14,400	\$800	22,000	\$72	136,700	\$28	267,400

# ER/URGENT ALLOWED / CASE



## PAYER PROVIDED COMPARATIVE ANALYSIS- CONT.

Facility Name	CRITICAL CARE	ER LEVEL V	ER LEVEL IV	ER LEVEL III	ER LEVEL II	ER LEVEL I
All	\$9,800	\$4,800	\$2,700	\$1,300	\$1,600	\$800
Lincoln Health	\$1,700	\$1,300	\$1,100	\$700	\$400	N/A
Proposed Cap on Case Rate	\$4,800	\$2,100	\$1,760	\$1,480	\$1,250	\$850
Peer Group	\$10,100	\$4,900	\$2,700	\$1,300	\$1,600	\$800



# RADIOLOGY ALLOWED / CASE



## PAYER PROVIDED COMPARATIVE ANALYSIS- CONT.

Facility Name	MRI	ULTRASOUND	CT	ALL OTHER
All	\$1,922	\$703	\$1,614	\$344
Lincoln Health	\$873	\$464	\$452	\$316
Proposed Cap on Case Rate	\$1,280	\$450	\$720	450% of MCR
Peer Group	\$1,935	\$706	\$1,639	\$345

# Setting Our Sights: A Path Forward

## Our Goal



- To achieve reimbursement rates at the mean of similarly situated hospitals in Colorado.
- Specifically, independent Critical Access Hospitals (CAHs).

## Update on Status:



**2%** Initial proposed increase

**5%** Updated proposed increase

- Pending notice of term.





# Future Advocacy: Solutions & Models

Advocacy for Sustainable Solutions



## State Legislation:

- Establishing a floor for essential services

## Global Budgeting:

- An alternative payment model to stabilize rural hospitals

## Utility Model for Healthcare:

- Treating healthcare as a public utility, ensuring access and stability,



# What is Colorado Rural Futures?

## Background

**"Stop admiring the problem and work toward solutions"**  
Grassroots effort of Rural Hospital CEOs



## Financial support

Financial pledges from Rural Hospitals and Urban Systems



Engagement of Farley Health Policy Center



## Scope of the study – Aims

- Aim 1 – Understand the root causes of distress in Colorado's Rural and Frontier Hospitals
- Aim 2 – Develop a definition of core health services that meet essential health needs in rural and frontier communities
- Aim 3 – Identify a range of state-level policy solutions and develop a policy road map







# Essential Services



What defines a community?



What Services are truly essential?



How do we sustainably pay for these services?





Thank You

Questions?



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