

Source: 5
Issue: 10, 11, 32, 1

Cowden Medical Clinic, LLC

209 E Elm St+PO Box 154+Cowden, Illinois+(217) 783-6565+Fax (217) 783-6577

May 28, 2008

Health Resources and Services Administration
Department of Health and Human Services
Attention: Ms. Andy Jordan
8-C Parklawn Building
5600 Fishers Lane
Rockville, MD. 20857

Dear Ms. Jordan:

This letter is in response to the proposed methodology changes regarding the Health Professional Shortage Area (HPSA) calculations for various programs, including the Rural Health Clinic (RHC) program. The following recommendations are intended to be constructive and would eliminate some of the short-term and potentially long-term, negative impacts which could result in unintended permanent trends:

- 1 Adjustment factors should not be based on data older than four years. (32)
- 2 HRSA is correct to eliminate Federally place providers required to be in an area for purposes of determining HPSA status. Additionally, to further prevent a "yo-yo" effect, especially in the population-to-provider ratio, the provider FTEs of the "dominant" RHC in an area should be eliminated in determining if the HPSA status is proper. To illustrate the short-term causative impact, if the provider FTEs of the "dominant" RHC are counted an area may be de-designated primarily because of that one clinic and its provider FTEs. Further, if that same area subsequently requalifies as a HPSA because some of that "dominant" (RHC) clinic's provider FTEs have left the area (because of the loss of its HPSA designation), then the "yo-yo" effect will be very evident because of such inclusion. Thus, to avoid such a "yo-yo" effect we recommend that the provider FTEs of the "dominant" RHC should not be counted. ~~(3)~~ 11
- 3 The use of a 3,000 to 1 ratio threshold is not credible with overwhelming evidence indicating that a 1,500 to 1 ratio is a much more reasonable number. Sources indicating the 1,500 to 1 ratio as a health provider shortage threshold include the Centers for Medicare and Medicaid Services (CMS), the Veterans Administration, the National Health Service Corps and a major University report. (1)

Cowden Medical Clinic, LLC

209 E Elm St+PO Box 154+Cowden, Illinois+(217) 783-6565+Fax (217) 783-6577

Page 2

In summary, significant changes to the methodology will only bring about further reductions in healthcare access for rural areas during a period of an aging America. Though the proposal suggests only a 6% reduction of HPSA providers, it is my belief that the impact will be far greater and could be more devastating than predicted unless serious consideration and incorporation of the above recommendations are made.

10

Sincerely,

Cindy Rich APN CNP

Cindy Rich APN CNP
Cowden Medical Clinic, LLC