SERVICE LIMITATION OPTIONS FOR LIMITED SERVICE RURAL HOSPITALS

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EXECUTIVE SUMMARY

The purpose of this report is to present an alternative to a length of stay limit for defining service limitations for limited service rural hospitals, such as the rural primary care hospital (RPCH). The alternative proposal is based on the results of an analysis of FY 1991 Medicare discharges from rural hospitals likely to be interested in becoming a limited services facility (i.e. those with average daily census less than ten) and the judgements of a technical advisory panel of rural clinicians.

The analysis indicates that:

- Small rural hospitals admit patients in a limited number of DRG categories, which typically represent low-intensity medical admissions.
- Small rural hospitals transfer relatively few cases to other hospitals.
- Lengths of stay in small rural hospitals frequently exceed three or four days.
 Using length of stay limits to define service limitations would discourage many potential candidates for limited service facility status because they would lose a substantial portion of their existing inpatient business.

The proposed service limitation for alternative models, such as RPCHs, builds upon existing features of the Essential Access Community Hospital Program and the Prospective Payment System. Specifically, it features the 72-hour length of stay limit proposed for RPCHs, uses DRGs as the method for describing patients, and uses peer review organizations as a quality assurance regulator. These features are used collaboratively in the proposal. Because the proposal "reuses" existing features of the Medicare program, it minimizes the need for elaborate new policies.

Unlike the static length-of-stay limitation for RPCHs as currently envisioned, the proposed method features a clinical basis for approving care. It recognizes the variation that will exist among facilities participating as RPCHs, and attempts to accommodate it. Because the system is clinically-based and flexible, it is likely to be more palatable to providers than the system currently proposed for limiting services.

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INTRODUCTION

Our previous work reviewed the current state of development of limited service rural hospitals and discussed alternative mechanisms for defining the limitations placed on services in these facilities (Moscovice, Sales, Christianson and Wellever, 1992). We found that the most common service limitation that has been used in defining alternative models is a length of stay limit, that is, a limit placed on the number of days or hours that a patient may remain in a limited service facility. However, there was little empirical or conceptual support for this type of limit and a number of alternative approaches have been suggested. We concluded that the most useful approach would feature a limit on the types of patients that can be admitted based on their admitting diagnosis (classified by DRG), together with concurrent utilization review monitoring and surveillance by the state Peer Review Organization (PRO).

Since the publication of our previous report, the issue of defining service limitations for alternative models to the traditional rural hospital has become a source of controversy in the discussions surrounding the implementation of the federal EACH/RPCH program. In response to the proposed rules for the program (published by HCFA on October 25, 1991; see Federal Register, Vol. 56, No. 207, pp. 55382-55414), the seven states that received EACH/RPCH grants participated in a series of implementation meetings. At these meetings, the states reiterated the need for programmatic flexibility to implement the EACH/RPCH concept in a variety of different hospital, network, and state settings (EACH Grant States, 1992). Although they agreed with the legislative intent to limit inpatient services, they expressed serious concerns about the strict interpretation of both the six-

bed and 72-hour length of stay limit in HCFA regulations and the requirement that RPCH physicians would have to certify inpatient services as "required to be furnished on a temporary inpatient basis." The states supported a policy that would limit the bed size and range of services provided in RPCH's, but were concerned that an inflexible policy could lead to increased costs and considerable disruption for Medicare patients treated in RPCH's.

The purpose of this report is to present an alternative proposal for defining service limitations for limited service rural hospitals based on the results of an analysis of relevant existing secondary data sources and the judgements of a technical advisory panel of rural clinicians.

ANALYSIS OF HCFA MEDPAR DATA

Service limitation is the most important characteristic in defining alternatives to the traditional acute care rural hospital (Christianson, Moscovice, Wellever, and Wingert, 1990). It drives the size, composition, and staffing requirements of the facility, along with decisions about basic equipment and core diagnostic and therapeutic modalities. It also drives the rules and regulations intended to assure the safety and welfare of patients cared for in these facilities. Despite its importance, service limitation is the least developed aspect of alternative model experimentation.

The Montana state law that establishes Medical Assistance Facilities (MAFs) and the Federal statute that establishes RPCHs define the service limitations for these facilities by a maximum length of stay (72 hours for RPCHs and 96 hours for MAFs) (AHCPR, 1991). These length of stay limitations have no clinical basis and are one of the most

controversial aspects of MAFs and RPCHs. Their strict enforcement would result in transfers of patients who may require only one or two additional inpatient treatment days and inhibit transfers of patients from full-service hospitals for convalescence.

To assess alternative proposals for defining service limitations, we examined information on the services provided in small rural hospitals likely to be interested in becoming a limited service facility. Based on our previous research, we defined this group as non-Metropolitan Statistical Area hospitals with an average acute patient daily census of less than ten. Our goal was to answer the following questions:

- What types of patients should we expect to see treated in a limited service rural hospital?
- What types of patients should we expect to see transferred from a limited service rural hospital?

To address these questions, we used HCFA's Expanded Modified MEDPAR Hospital file, which contains detailed information (e.g. DRG, length of stay, discharge status, and charges) for all hospital discharges for Medicare beneficiaries. Despite the completeness and richness of this data base, and the relative importance of Medicare clients to rural hospitals (i.e. nationally, Medicare represented 40% of net patient revenues at rural community hospitals in 1991) (American Hospital Association, 1992), the use of MEDPAR data precludes analysis of obstetric, pediatric, and adolescent health discharges. These areas are addressed to some degree in a recent AHCPR report, which summarizes the 50 most frequent DRG's and procedures in small rural hospitals based on 1986 data from the Hospital Cost and Utilization Project (Lemrow, Adams, Coffey and Farley, 1990).

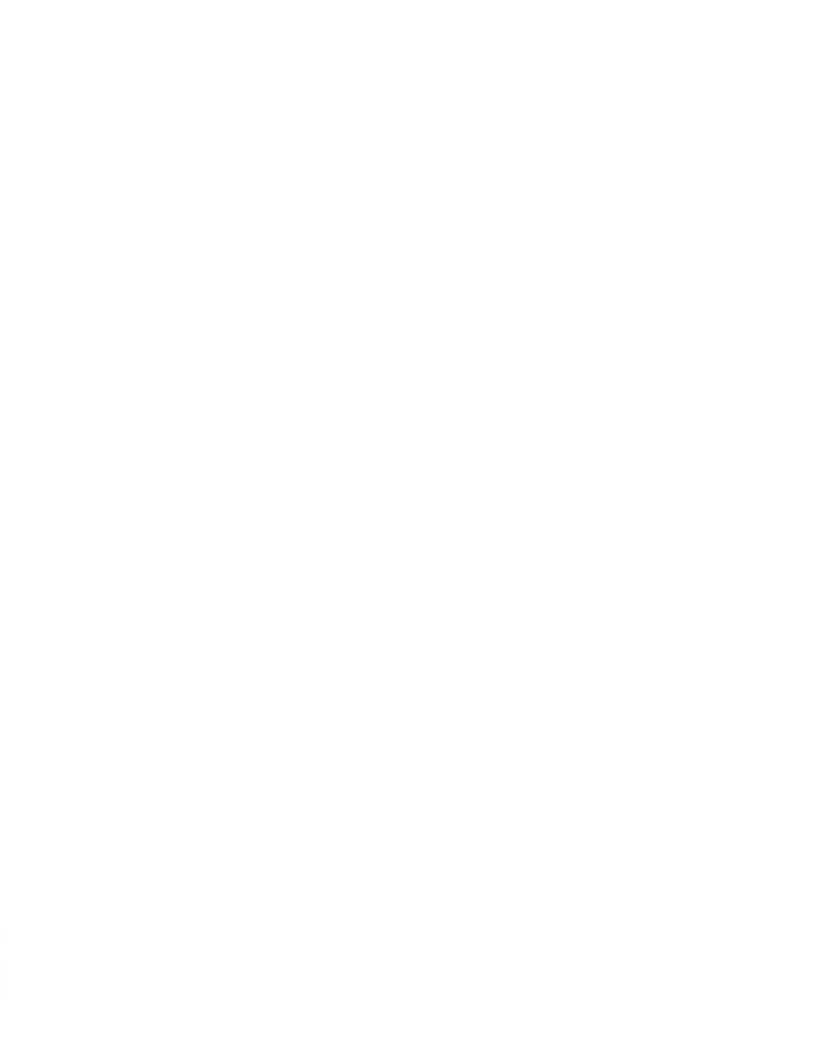
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Based on data from the 1989 American Hospital Association Masterfile and 1989 Prospective Payment System Files, we identified 784 rural (i.e. non-MSA) hospitals with average daily census less than ten. For each hospital on the list, we requested FY 1991 data from HCFA on the total number of discharges, length of stay (mean, standard deviation), discharge status (transfers by destination, discharge to home, deaths), total charges, and total Medicare reimbursement for each DRG. In April, 1992, we received the above information from HCFA for 690 rural hospitals on our original list that were still operational as inpatient facilities in 1991 (i.e. had not closed, converted or merged).

Appendix 1 describes the characteristics of FY 1991 Medicare discharges from these 690 hospitals. For instance, the first line of information indicates that DRG 89, simple pneumonia and pleurisy age >17 with CC, is the most frequent DRG seen by small rural hospitals. Across our population of 690 rural hospitals, there were 12,242 cases in DRG 89 which represented 8.5% of the total number of cases (144,661) seen in all of the hospitals. The average length of stay for DRG 89 was 6.2 days with a standard deviation of 4.4 days. Of all cases in DRG 89, 79.4% had lengths of stay greater than three days and 64.5% had lengths of stay greater than four days. The relative weight for DRG 89 is 1.1658. Of the total of 12,242 cases in DRG 89, 4.5% were discharged to another hospital, 13.5% to a SNF, and 7.8% died. Finally, 98.3% of all of the hospitals in the sample had at least one case in this DRG. The remainder of the Appendix presents comparable information for each DRG, with the list presented in descending order of the total number of discharges in each DRG.

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Most of the information presented in Appendix 1 can be calculated directly from the MEDPAR data we received from HCFA. Due to the large size of the data file, we requested aggregate data (e.g. total number of cases, mean and standard deviation of length of stay, percent cases transferred) by DRG for each rural hospital in the sample rather than requesting data on individual discharges from these hospitals. As a result, several assumptions had to be made before we could calculate the standard deviation of length of stay and the percent of cases with lengths of stay greater than three days or four days. We assumed that individual patients' lengths of stay are independent from each other, both within and across hospitals, and that the distribution of length of stay in each DRG is log normal. The log normal assumption is appropriate for a variable such as length of stay which has no upper limit, can never have values below zero, and has a small number of outlier cases. This assumption has been empirically validated in previous research on length of stay (Secretary, USDHHS, 1982). Details of the calculations discussed above are presented in Appendix 2.

Since Appendix 1 contains a substantial amount of information, several key points are highlighted:¹

¹We conservatively assumed that rural hospitals interested in becoming a limited service facility included those with average daily census less than ten. To better understand the sensitivity of our results to this assumption, we also computed Appendix 1 for the 467 rural hospitals in the sample with average daily census less than 8 and again for the 299 with average daily census less than six. After ordering these lists by descending order of discharges in a DRG, we calculated Spearman Rank Order Correlation Coefficients of .99 between the average daily census less than ten list and average daily census less than eight lists and .98 between the average daily census less than ten list and average daily census less than six lists. The ordering of the DRG lists does not appear to be sensitive to the average daily census limit used to define the sample.

• Small rural hospitals admit patients in a limited number of DRG categories, which typically represent low-intensity, medical admissions. In FY 1991, the ten most frequent DRG's accounted for 41% of the total caseload of rural hospitals with average daily census less than ten; the top 20 DRG's accounted for 57% of the caseload. In addition, 71 DRGs were not seen in any of the 690 hospitals and 170 DRGs had less than ten total cases across all of the hospitals in the sample. These data suggest that there is a small group of DRGs that all small rural hospitals may be expected to admit; it is unlikely that a particular small rural hospital will admit patients in a broad range of DRGs.

The most frequent DRGs seen in small rural hospitals can generally be characterized as low-intensity (as measured by DRG relative weights) medical (i.e. non-surgical) admissions such as pneumonia, angina pectoris, esophagitis, bronchitis and asthma, urinary tract infections, and chronic obstructive pulmonary disease. Comparing Appendix 1 with the list of most frequent DRG's discharged from all hospitals in 1986 (see Lemrow, Adams, Coffee, and Farley, 1990), one observes a similarity in the most frequent DRGs on both lists. Five of the ten most frequent DRGs in small rural hospitals are also in the top ten DRGs discharged from all hospitals. Of the remaining five of the top ten in the all-hospital list, three DRGs are associated with deliveries and one is associated with hysterectomies for women under age 70. These DRGs, of course, are not represented in our sample. A similar pattern exists for the next ten most frequent DRGs on the list in Appendix 1.

• Small rural hospitals transfer relatively few cases to other hospitals

Overall, of the 144,661 total number of cases discharged from the sample of rural hospitals in FY 1991, 7.2% were transferred to another hospital. Of the 155 DRGs that had at least 100 discharges, only seven had a transfer rate of at least 20% and 40 had a transfer rate of at least 10%.² Table 1 presents a list of the DRGs that were transferred most frequently to other hospitals. The list includes diseases and disorders of the circulatory system, the digestive system, the biliary system, and the respiratory system. These data suggest that hospitals that may be interested in converting to limited service status are likely to have low transfer rates to larger institutions. This is consistent with their propensity to admit low-intensity non-surgical patients.

 Lengths of stay in small rural hospitals frequently exceed three or four days. Using length of stay limits to define service limitations would discourage many potential candidates for limited service facility status because they would lose a substantial portion of their existing inpatient business.

None of the 20 most frequent DRGs in Appendix 1 have an average length of stay less than three days, and only four are less than four days. Moreover, 62.4% of all of the cases in the top 20 DRGs had lengths of stay greater than three days and 47.8% greater than four days. Comparable figures for all 492 DRGs are 61.6% of admissions with lengths of stay longer than three days and 47.1% longer than four days.

²Table 1 does not include DRGs that had less than 100 discharges because we assumed we could not make reasonable inferences about the transfer rate for those DRGs.

TABLE 1

DRGS MOST FREQUENTLY TRANSFERRED FROM SMALL RURAL HOSPITALS
TO OTHER HOSPITALS
(AT LEAST 100 DISCHARGES IN FY 1991)

DRG	Description	Transfer Rate to Other Hospitals	# Discharges for DRG
122	Circulatory Disorders with AMI and without Comp.	32.6%	2058
121	Circulatory Disorders with AMI and Comp.	26.1%	2078
475	Respiratory System Diagnosis with Ventilator Support	24.1%	191
189	Other Digestive System Diagnoses without Comp.	23.7%	135
207	Disorder of Biliary Tract with Comp.	22.3%	1024
133	Atherosclerosis without Comp.	21.9%	320
181	G.I. Obstruction without Comp.	21.1%	606

In estimating the number of inpatient days lost due to length of stay cutoffs (such as those used in the EACH/RPCH program and the Montana MAF program), we assumed that hospitals would admit these cases and transfer them after the length of stay cutoff was reached. With this assumption, we estimate that small rural hospitals would lose a substantial portion of their inpatient days (51.1% with a three-day LOS limit, 40.7% with a four-day LOS limit) if LOS limits are imposed as a service limitation criteria. This clearly will be a disincentive against conversion for small rural hospitals and could be an important issue if federal and state policymakers want programs such as EACH/RPCH and MAF to receive serious consideration by rural hospitals that are not already closed or on the brink of closure.

WHY PREVIOUS SERVICE LIMITATION PROPOSALS DON'T WORK

In the interim report for the project, we discussed four mechanisms for defining service limitations in alternative models to the traditional rural hospital. These included:

- Length of stay limits that restrict the amount of time a patient can remain in a facility following admission.
- DRG-based limits that place restrictions on the types of patients that can be admitted to a limited service facility.
- A laissez-faire approach that voluntarily limits admissions and services relative to the professional staff and other resources available in a facility.
- A modular approach that certifies facilities to provide a group of core services, which may be augmented by the addition of various service

³The estimates of lost inpatient days increase dramatically (86.5% with a three-day LOS limit, 76.8% with a four-day LOS limit) if we assume hospitals wouldn't admit cases that were expected to have lengths of stay longer than the cutoff point.

modules depending on the needs of the community and capabilities of the facility and staff.

Although the length-of-stay service limitation is, perhaps, the weakest of the methods proposed to circumscribe the types of patients to be treated and the range of services they are to receive at limited service rural hospitals, the other methods, by themselves, are also unsuitable for limiting services (Moscovice, Sales, Christianson, and Wellever, 1992). None of the existing service limitations, if applied without a clinically-based exceptions process, achieves a reasonable set of objectives for a well-defined limit on the scope of inpatient services. Those objectives are:

- 1. To consider and, where possible, to accommodate local ability to care for patients as measured by the training of the facility's professional and allied staff and the availability of medical equipment;
- 2. To consider and, where possible, to accommodate the professional judgement of practitioners treating patients at the facilities;
- 3. To protect the health and safety of patients treated at the facilities;
- 4. To deter fraud and abuse by restricting opportunities to "game," or circumvent, the service limitation rules;
- 5. To provide the maximum opportunity for patients to receive care in settings as close to their homes as is appropriate; and
- 6. To state clearly and unambiguously the rules and procedures necessary to implement the method.

The four primary proposals for limiting services defined above fail to satisfy these goals. As mentioned previously, length-of-stay limits, while unambiguous and resistant to abuse, do not provide opportunities for local decision-making and professional judgement. Length-of-stay limits address only the length of time that a patient may be treated at the facility, not the appropriateness of the care setting, and thus this type of

service limitation does not adequately assure the health and safety of patients admitted to the facility. Also, length-of-stay service limitations require that a patient be transferred at the conclusion of a time-limited stay, regardless of the patient's condition, prognosis or wishes, or the facility's ability to adequately provide the further care required.

Unlike length-of-stay limitations, DRG-based limitations restrict admissions to a subset of all patient conditions. However, if strictly applied, DRG-based limitations are no more successful at achieving the other goals than are length-of-stay limitations. Like length-of stay limits, DRG-based limitations do not accommodate local circumstances. Because they do not, they may force transfers of patients that could safely be cared for in local facilities. If DRG assignments are not validated by an external agency such as a peer review organization or a fiscal intermediary, the limitation can be manipulated by erroneously assigning a DRG that has been approved for admission. Finally, systems based on relative weights or approved lists of DRGs may produce inconsistencies in the care provided in limited service facilities. Lower intensity cases may be transferred and higher intensity cases may be authorized for admission. Some type of exceptions process would be necessary to address this problem.

The laissez-faire approach to limiting services allows local decision-making and the exercise of professional judgement and permits patients to stay in the community, but its lack of specificity jeopardizes health and safety, opens the system to inappropriate admissions, and is extremely ambiguous. The modular approach to limiting services recognizes that local facilities have different levels of capability to provide services. However, under this approach, the exercise of provider judgement exists only within the

confines of the modules selected. Patient health and safety are addressed by the attempt to match facility resources with the needs of patients. Because the services offered fall either within approved modules or outside of approved modules, the system is unambiguous. Patients who require services that are not available at the facility must leave the community to receive services. "Gaming" the system - by reclassifying patients with conditions that should not be treated at the facility to conditions that are acceptable—would be less likely under this method than it would be under a DRG-based method, but the potential for inappropriate admissions is still high. Table 2 lists the reasonable objectives of a service limitation and assesses the potential success of the various methods at achieving them.

To achieve all of these objectives, it is necessary to introduce an exceptions process that permits relaxation of the limitation on a patient-by-patient basis, or to combine several approaches to service limitation. We have developed an alternative service limitation that builds upon the existing length-of-stay limitation by combining it with a modular, DRG-based approach, subject to concurrent utilization review.

Just as traditionally licensed hospitals exhibit significant variation in the scope of services they provide, limited service rural hospitals are likely to vary widely in their institutional capability. Some will be staffed by multiple physicians, while others will be staffed with a single physician or mid-level practitioner. Some will have diagnostic and therapeutic medical equipment available that is absent in others. The nursing and ancillary staffs in some will have greater training and skills than in others. There is also likely to be considerable variation among patients with the same diagnosis admitted to

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TABLE 2

CHARACTERISTICS OF SERVICE LIMITATION PROPOSALS

			Laissez-	
Objectives	LOS	DRG	Faire	<u>Modular</u>
Accommodate local circumstances	no	no	yes	yes
Accommodate professional judgement	no	no	yes	no
Protect health and safety	no	yes	no	yes
Deter fraud and abuse	yes	no	no	no
Stay close to home	no	no	yes	no
Be clear and unambiguous	yes	no	no	yes

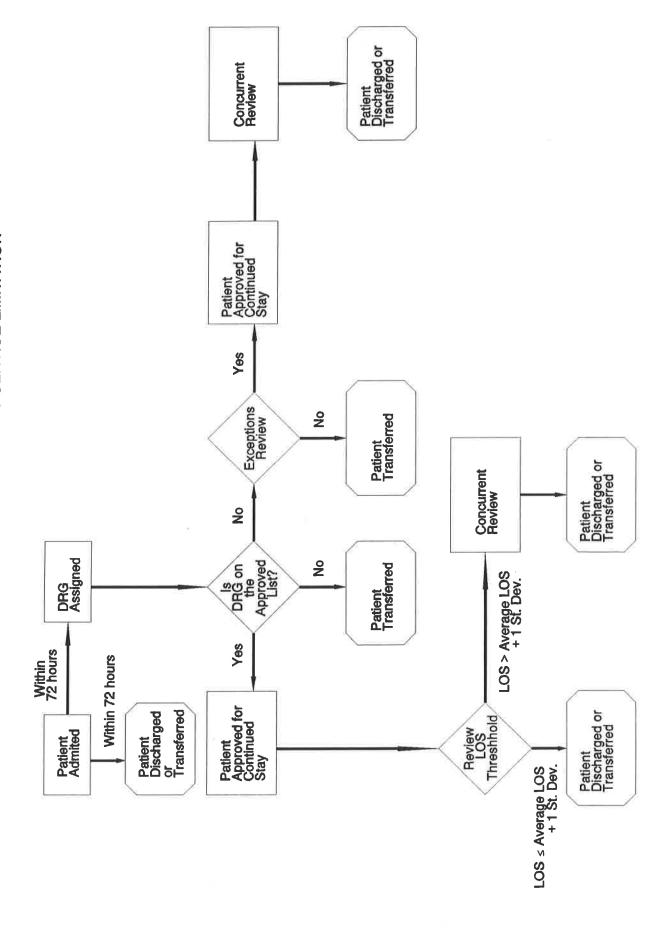
limited service rural hospitals. Diagnosis, severity of illness, stage of illness, and the psycho-social needs of the patient all play a role in the determination of the appropriate treatment site. The service limitation that we propose explicitly recognizes institutional variation within the limited service rural hospital licensure category and the unique needs of each patient.

AN ALTERNATIVE PROPOSAL FOR DEFINING SERVICE LIMITATION

The proposed method for limiting services in alternative models to the traditional rural hospital combines several of the approaches that have already been used or suggested (see Figure 1). Under the proposed method, the patient's stay begins with an evaluation that cannot extend past 72 hours. At any time during the evaluation, a patient may be discharged or transferred as the condition of the patient warrants. At the end of the evaluation, the patient is assigned a DRG. The administrators of the program will have divided the 492 DRGs into two groups: (1) conditions that are not appropriate to treat at limited service rural hospitals, and (2) conditions that are appropriate to treat at limited service rural hospitals.

The DRG assigned to the patient is compared to the list of approved DRGs. If the patient's DRG is on the list of conditions not appropriate for treatment in a limited service rural hospital, the patient is transferred immediately or an exceptions review is requested. If the patient's DRG is among those on the list approved for treatment, the patient is automatically certified for a continued stay at the facility. However, even if the patient's DRG is among those on the list of approved DRGs, the facility may choose to transfer the

FIGURE 1 A NEW PROPOSAL FOR DEFINING SERVICE LIMITATION



patient. That is, the facility is not required to treat patients with diagnoses that appear on the approved DRG list.

If the patient's DRG is not on the list of conditions that are approved for treatment at a limited service rural hospital, the facility may request a review of the appropriateness of admission to the facility for this particular case. As part of this "exceptions review," the Peer Review Organization (PRO) assesses the capability of the facility to care for the patient and the condition and prognosis of the patient and renders a decision either to transfer the patient to a full-service hospital or to certify the patient for a continuation of their stay at the limited service facility. The decision of the PRO reviewer may be appealed to a physician reviewer, but the decision of the physician reviewer is final. Violations of PRO directives will result in denial of payment for Medicare patients.

If the 72-hour evaluation period expires during a weekend or on a holiday, and a limited service hospital intends to request an exceptions review to extend the treatment of a patient under its care, the facility must contact the PRO and leave a message describing the condition and prognosis of the patient, identifying the patient's preliminary DRG, and announcing its intention to request a review. The message will be evaluated by PRO staff at the earliest available time and a decision will be made to concur with the continuation of the stay or to deny it. Providers who call and leave an appropriate message will be presumed to be acting in good faith and will not be denied payment for services rendered between their first attempt to contact the PRO and the PRO's decision to deny an exception.

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When a patient is certified for a continuation of their stay, a process of mandatory concurrent review is triggered. The PRO will monitor the care of the patient for appropriateness of care, and, if warranted, may require the patient to be transferred. On its own initiative, as indicated by the condition of the patient and the capability of the facility, the facility may also choose to transfer the patient. If the patient is not transferred, he/she will be discharged from the limited service rural hospital.

If the patient's DRG is not on the list of conditions that is approved for treatment at a limited service rural hospital and the facility does not request an exceptions review, the patient must be transferred immediately to a full-service hospital.

Mandatory concurrent utilization review is also required of patients who are automatically certified for continuation of their stay (by virtue of their DRG appearing on the list of approved DRGs) when their length of stay exceeds the mean length of stay plus one standard deviation for similar DRGs treated at rural hospitals whose average daily census is ten or fewer. The procedure for review by the PRO and the transfer/discharge options in these cases are identical to those described above relating to the exceptions process.

In summary, the proposed system for limiting services begins with an evaluation period based upon a length-of-stay limitation. Following the evaluation, patients are assigned to one of two modules that are determined by DRGs. Patients whose DRGs are on the approved list are allowed to continue to receive care in the facility. Facilities must justify that an exception is warranted for patients whose DRGs are not on the approved list must be transferred list. Otherwise, patients whose DRGs are not on the approved list must be transferred

immediately. Patients whose care is extended beyond the 72-hour evaluation period may be subject to concurrent utilization review by the PRO.

KEY ASPECTS OF ALTERNATIVE PROPOSAL

72-Hour Evaluation Period

The method proposed for limiting services builds upon existing features of the Essential Access Community Hospital (EACH) Program and the Prospective Payment System (PPS). The EACH legislation and the proposed rules for the program limit patient stays in RPCHs to a maximum of 72 hours. Implicitly, there are no limitations placed upon the types of patients that can be admitted to the facility. The presumption is made that it is appropriate to admit any patient for observation and stabilization prior to discharge or transfer. Furthermore, there is no prohibition against admitting a patient with the intention of a transfer at some future time within the 72-hour limit. The service limitation described above suggests that the outcome of the process of observation and stabilization can, and should be, more than a mandatory transfer. It is possible during the 72-hour evaluation of the patient to determine whether the RPCH is the appropriate site for continued treatment. For example, consider a patient admitted for evaluation of a gastrointestinal obstruction with complications (DRG 198). During the first 72 hours, the patient has been on nasogastric suction and IV fluids and has been responding well to treatment. The physician feels the patient needs two more days of hospitalization for electrolyte adjustment and to see how well oral feeding is tolerated. If the determination has been made that the RPCH is an appropriate treatment site, the threshhold of the 72hour limitation could be extended.

DRG-Based Exceptions Process

DRGs are used as the initial criteria for evaluating the extension of care in alternative models such as rural primary care hospitals. DRGs are also employed by Medicare as the basis for making payments for inpatient care to PPS hospitals. A technical advisory panel of three clinicians was asked to review the 492 DRGs and to assign each DRG to one of two groups: (1) conditions that are not appropriate to treat at rural primary care hospitals, and (2) conditions that are appropriate to treat at rural primary care hospitals. In making the assignment of DRGs to one of the two groups, the advisory panel assumed the following:

- No surgical cases would be treated at RPCHs.
- No obstetrical cases would be treated at RPCHs.
- Only primary care providers (general practice or family practice physicians or mid-level practitioners) would provide medical services at RPCHs.
- Only basic laboratory services (as defined in the Notice of Proposed Rule Making for the RPCH Conditions of Participation, October 25, 1991) would be available at RPCHs.
- No blood banking services would be available at RPCHs.
- Only basic radiology services would be available at RPCHs (i.e., ability to perform studies of chests, abdomens, and extremities, but no requirement to provide fluoroscopy).

The three clinicians on the advisory panel were:

Raymond Christensen, MD

Dr. Christensen is a family practice physician in Moose Lake, Minnesota and serves as a medical advisor on rural health and other issues to the Minnesota Department of Health.

James Reid, PA-C

Mr. Reid is a physician's assistant currently working as a consultant on clinical outreach services for the Deaconess Medical Center of Billings, Montana. He has been involved in the development of Medical Assistance Facilities in Montana.

Thomas Simpson, MD

Dr. Simpson is a family practice physician in Sterling, Kansas. He has been involved in the implementation of the EACH-RPCH program in Kansas.

Each of the panelists has had considerable experience delivering primary care in rural areas, and in managing patients in rural hospitals. They all had the opportunity to review the information in Appendix 1 prior to making decisions on which DRGs are appropriate to treat at RPCHs.

The DRGs (492 total) were divided into surgical and medical DRGs. An initial assumption was made that no surgical cases would be treated at RPCHs. This left 279 medical DRGs; of these, another eight were "DRGs no longer in use", leaving a total of 271 medical DRGs that were considered for inclusion in the group of DRGs appropriate for admission to an RPCH. Each of the clinicians was asked to decide independently whether each of the medical DRGs was appropriate for inclusion, based on clinical judgement. When there was no consensus on a given DRG, the judgement of two out of the three clinicians was used to determine whether that DRG should be included on the list of DRGs appropriate to treat in a limited service facility.

Of the 271 medical DRGs, 162 were considered inappropriate for admission and treatment in an RPCH (following the evaluation period necessary to assign a correct DRG, not to exceed 72 hours). This left 109 DRGs that were considered appropriate to admit and treat in a limited service rural facility (Table 3). These DRGs were divided by Major

TABLE 3

109 MEDICAL DRGS APPROPRIATE TO ADMIT AND TREAT IN AN RPCH

MDC 01 DISEASES AND DISORDERS OF THE NERVOUS SYSTEM

- DRG 13 MULTIPLE SCLEROSIS & CEREBELLAR ATAXIA
- DRG 14 SPECIFIC CEREBROVASCULAR DISORDERS EXCEPT TIA
- DRG 25 SEIZURE & HEADACHE AGE > 17 W/0 CC
- DRG 30 TRAUMATIC STUPOR & COMA, COMA < 1 HR AGE 0-17
- DRG 32 CONCUSSION AGE > 17 W/O CC
- DRG 33 CONCUSSION AGE 0-17

MDC 02 DISEASES AND DISORDERS OF THE EYE

DRG 43 HYPHEMA

MDC 03 DISEASES AND DISORDERS OF THE EAR, NOSE AND THROAT

- DRG 66 EPISTAXIS
- DRG 68 OTITIS MEDIA & URI AGE > 17 WITH CC
- DRG 69 OTITIS MEDIA & URI AGE > 17 W/O CC
- DRG 70 OTITIS MEDIA & URI AGE 0-17
- DRG 71 LARYNGOTRACHEITIS
- DRG 73 OTHER ENMT DIAGNOSES AGE > 17
- DRG 74 OTHER ENMT DIAGNOSES AGE 0-17

MDC 04 DISEASES AND DISORDERS OF THE RESPIRATORY SYSTEM

- DRG 80 RESPIRATORY INFEC & INFLAMMAT AGE>17 W/O CC
- DRG 81 RESPIRATORY INFEC & INFLAMMATIONS AGE 0-17
- DRG 86 PLEURAL EFFUSION W/O CC
- DRG 88 CHRONIC OBSTRUCTIVE PULMONARY DISEASE
- DRG 89 SIMPLE PNEUMONIA & PLEURISY AGE > 17 WITH CC
- DRG 90 SIMPLE PNEUMONIA & PLEURISY AGE > 17 W/O CC
- DRG 91 SIMPLE PNEUMONIA & PLEURISY AGE 0-17
- DRG 93 INTERSTITIAL LUNG DISEASE W/O CC
- DRG 96 BRONCHITIS & ASTHMA AGE > 17 WITH CC
- DRG 97 BRONCHITIS & ASTHMA AGE > 17 W/O CC
- DRG 98 BRONCHITIS & ASTHMA AGE 0-17
- DRG 99 RESPIRATORY SIGNS & SYMPTOMS WITH CC
- DRG 100 RESPIRATORY SIGNS & SYMPTOMS W/O CC
- DRG 101 OTHER RESPIRATORY SYSTEM DIAGNOSES WITH CC
- DRG 102 OTHER RESPIRATORY SYSTEM DIAGNOSIS W/O CC

MDC 05 DISEASES AND DISORDERS OF THE CIRCULATORY SYSTEM

- DRG 127 HEART FAILURE & SHOCK
- DRG 128 DEEP VEIN THROMBOPHLEBITIS
- DRG 131 PERIPHERAL VASCULAR DISORDERS W/O CC
- DRG 133 ATHEROSCLEROSIS W/O CC
- DRG 134 HYPERTENSION
- DRG 140 ANGINA PECTORIS
- DRG 142 SYNCOPE & COLLAPSE W/O CC
- DRG 143 CHEST PAIN
- DRG 145 OTHER CIRCULATORY SYSTEM DIAGNOSES W/O CC

MDC 06 DISEASES OF THE DIGESTIVE SYSTEM

- DRG 178 UNCOMPLICATED PEPTIC ULCER W/O CC
- DRG 179 INFLAMMATORY BOWEL DISEASE
- DRG 183 ESOPHAG., GASTRO & MISC DIG DISORD AGE > 17 W/O CC
- DRG 184 ESOPHAG., GASTRO & MISC DIGEST DISORD AGE 0-17
- DRG 187 DENTAL EXTRACTIONS & RESTORATIONS
- DRG 189 OTHER DIGESTIVE SYSTEM DXS AGE > 17 W/O CC
- DRG 190 OTHER DIGESTIVE SYSTEM DIAGNOSES AGE 0-17

MDC 07 DISEASES AND DISORDERS OF THE HEPATOBILIARY SYSTEM AND PANCREAS

DRG 208 DISORDERS OF THE BILIARY TRACT W/O CC

MDC 08 DISEASES AND DISORDERS OF THE MUSCULOSKELETAL SYSTEM AND CONNECTIVE TISSUE

- DRG 241 CONNECTIVE TISSUE DISORDERS W/O CC
- DRG 243 MEDICAL BACK PROBLEMS
- DRG 246 NON-SPECIFIC ARTHROPATHIES
- DRG 247 SIGN & SXS OF MUSCULOSKEL SYSTEM & CONN TISSUE
- DRG 248 TENDONITIS, MYOSITIS & BURSITIS
- DRG 249 AFTERCARE, MUSCULOSKELETAL SYSTEM & CONN TISSUE
- DRG 251 FX,SPRN,STR&DISL OF F/A,HAND,FOOT AGE>17 W/O CC
- DRG 252 FX,SPRN,STRN&DISL OF F/A, HAND, FOOT AGE 0-17
- DRG 254 FX,SPRN,STR&DIS OF U/A,LOWLEG EX FT AGE > 17 W/O CC
- DRG 255 FX,SPRN,STRN&DISL OF U/A, LOWLEG EX FOOT AGE 0-17
- DRG 256 OTHER MUSCULOSKELETAL SYS & CONN TISSUE DIAG

MDC 09 DISEASES AND DISORDERS OF THE SKIN, SUBCUTANEOUS TISSUE AND BREAST

- DRG 271 SKIN ULCERS
- DRG 276 NON-MALIGNANT BREAST DISORDERS
- DRG 278 CELLULITIS AGE > 17 W/O CC
- DRG 279 CELLULITIS AGE 0-17
- DRG 280 TRAUMA TO SKIN, SQ TISS & BREAST AGE > 17 W CC
- DRG 281 TRAUMA TO SKIN, SQ TISS & BREAST AGE > 17 W/O CC
- DRG 282 TRAUMA TO THE SKIN, SQ TISS & BREAST AGE 0-17
- DRG 283 MINOR SKIN DISORDERS WITH CC
- DRG 284 MINOR SKIN DISORDERS W/O CC

MDC 10 ENDOCRINE, NUTRITIONAL AND METABOLIC DISEASES AND DISORDERS

- DRG 294 DIABETES AGE >35
- DRG 295 DIABETES AGE 0-35
- DRG 296 NUTR & MISC METABOLIC DISORD AGE > 17 W CC
- DRG 297 NUTR & MISC METABOLIC DISORD AGE>17 W/O CC
- DRG 298 NUTR & MISC METABOLIC DISORDERS AGE 0-17
- DRG 301 ENDOCRINE DISORDERS W/O CC

MDC 11 DISEASES AND DISORDERS OF THE KIDNEY AND URINARY TRACT

- DRG 320 KIDNEY & URINARY TRACT INF AGE > 17 WITH CC
- DRG 321 KIDNEY & URINARY TRACT INF AGE > 17 W/O CC
- DRG 322 KIDNEY & URINARY TRACT INFECTIONS AGE 0-17
- DRG 324 URINARY STONES W/O CC
- DRG 326 KIDNEY&UR TRACT SIGNS & SYMPT AGE > 17 W/O CC
- DRG 327 KIDNEY & UR TRACT SIGNS & SYMPTOMS AGE 0-17
- DRG 332 OTHER KIDNEY & UR TRACT DIAG AGE > 17 W/O CC
- DRG 333 OTHER KIDNEY & URINARY TRACT DIAGNOSES AGE 0-17

MDC 12 DISEASES AND DISORDERS OF THE MALE REPRODUCTIVE SYSTEM

- DRG 348 BENIGN PROSTATIC HYPERTROPHY WITH CC
- DRG 349 BENIGN PROSTATIC HYPERTROPHY W/O CC
- DRG 350 INFLAMMATION OF THE MALE REPRODUCTIVE SYSTEM

MDC 13 DISEASES AND DISORDERS OF THE FEMALE REPRODUCTIVE SYSTEM

- DRG 368 INFECTIONS, FEMALE REPRODUCTIVE SYSTEM
 DRG 369 MENSTRUAL & OTHER FEMALE REPRODUCTIVE SYS DISORDERS
- MDC 14 PREGNANCY, CHILDBIRTH AND THE PUERPERIUM

DRG 382 FALSE LABOR

MDC 17 MYELOPROLIFERATIVE DISORDERS

DRG 410 CHEMOTHERAPY WITHOUT ACUTE LEUKEMIA AS SEC DIAG

MDC 18 INFECTIOUS AND PARASITIC DISEASES

- DRG 417 SEPTICEMIA AGE 0-17
- DRG 418 POSTOPERATIVE & POST-TRAUMATIC INFECTIONS
- DRG 421 VIRAL ILLNESS AGE > 17
- DRG 422 VIRAL ILLNESS & FEVER OF UNKNOWN ORIGIN AGE 0-17
- DRG 423 OTHER INFECTIOUS & PARASITIC DISEASES OR DXS

MDC 19 MENTAL DISEASES AND DISORDERS

DRG 428 DISORDERS OF PERSONALITY & IMPULSE CONTROL

MDC 20 ALCOHOL AND SUBSTANCE ABUSE

DRG 435 ALC/DRUG ABUSE OR DEP, DETOX OR OTH SYM TRT W/O CC

MDC 21 INJURIES, POISONINGS AND TOXIC EFFECTS OF DRUGS

- DRG 445 TRAUMATIC INJURY AGE > 17 W/O CC
- DRG 446 TRAUMATIC INJURY AGE 0-17
- DRG 447 ALLERGIC REACTIONS AGE > 17
- DRG 448 ALLERGIC REACTIONS AGE 0-17
- DRG 450 POISONING & TOXIC EFFECTS OF DRUGS AGE>17 W/O CC
- DRG 451 POISONING & TOXIC EFFECTS OF DRUGS AGE 0-17
- DRG 455 OTHER INJURY, POISONING & TOXIC EFF DIAG W/O CC

MDC 22 BURNS

DRG 460 NON-EXTENSIVE BURNS W/O O.R. PROCEDURE

MDC 23 FACTORS INFLUENCING HEALTH STATUS AND OTHER CONTACTS WITH HEALTH SERVICES

DRG 462 REHABILITATION

DRG 464 SIGNS & SYMPTOMS W/O CC

DRG 465 AFTERCARE W HISTORY OF MALIG AS SECONDARY DIAG

DRG 466 AFTERCARE W/O HISTORY OF MALIG AS SECONDARY DIAG

DRG 467 OTHER FACTORS INFLUENCING HEALTH STATUS

OTHER

DRG 490 HIV W OR W/O OTHER RELATED CONDITION
DRG 492 CHEMOTHERAPY WITH ACUTE LEUKEMIA AS SECOND DIAG

Diagnostic Category (MDC), which categorizes DRGs by physiological system. The DRGs that are included on the "appropriate to admit" list are either short-term acute care DRGs, or are chronic DRGs without complications. These patients generally require low-intensity medical intervention for diagnosis or treatment and can be treated by primary care providers in an institutional setting without the immediate availability of secondary or tertiary level diagnostic and therapeutic back-up services.⁴

Approximately one-half of the DRGs on the list are drawn from five MDCs. Diseases and disorders of the respiratory system are the most common DRGs on the list with 15 entries, followed by non-surgical orthopedic DRGs with 11 entries. Diseases and disorders of the circulatory system and diseases and disorders of the skin, subcutaneous system and connective tissue both have nine entries and non-surgical diseases and disorders of the kidney and urinary tract have eight entries. Of the 109 DRGs, 23 are exclusively pediatric diagnoses, and are generally double counts of similar conditions for patients 17 years of age or older.

Many DRGs are paired as DRG sets with or without complications; for example, DRG 16 (nonspecific cerebrovascular disorders with complications) and DRG 17 (nonspecific cerebrovascular disorders without complications). In many of these pairs, the DRG without complications was included in the list of DRGs approved for treatment in a limited service facility, while the DRG with complications was not included. Of 61

⁴DRG relative weights may be used as a proxy for intensity of service as measured by normative resource consumption and length of stay. The DRG relative weights have been normalized so that the average case has a relative weight of 1.0. If the DRG relative weights are weighted by the number of cases discharged in FY 1991, we find that the weighted average DRG relative weight for DRGs on the approved list for RPCHs is .8881 as compared to 1.1455 for those DRGs not on the approved list. This supports o ur belief that the proposed service limitation focuses on admissions that require less intensive treatment.

pairs of DRGs (with or without complications), 51 of those with complications (84%) were excluded from the list of DRGs appropriate to treat. Of those without complications, 36 (59%) were included in the list of DRGs appropriate to treat. The existence of complications in a diagnosis was considered a significant factor in deciding to exclude that DRG from the list of those appropriate to treat. However, it does not appear to be the only factor considered by the panel.

In addition to deciding which DRGs should be included in a list of those appropriate to treat in a limited service facility, panel members were asked to consider clinical scenarios in which a patient with a DRG not on the approved list might be considered through the exceptions process as appropriate for treatment in a limited service facility.

A few examples of these are described below:

DRG 316: Renal failure

A patient with end-stage renal disease who is not felt to be a candidate for either renal transplant or dialysis; admitted in uremic coma; family and patient have stated their desire to avoid heroic measures. Patient is to be made comfortable until death, which is expected in 5-7 days.

DRG 180: G.I. Obstruction with complications

Patient was admitted about 72 hours ago for evaluation; has been on nasogastric suction and IV fluids since then; is responding well to treatment, but provider feels the patient needs 2-3 more days of hospitalization for electrolyte adjustment and to see how well oral feeding is tolerated.

DRG 430: Psychoses

Known schizophrenic was brought to the limited service facility on Friday evening; had not been taking prescribed psychotropic medication. Patient had been acting in a bizarre manner and is felt to be a possible danger to himself or to others in the family. The regional mental health center knows the patient, and says that the patient must

be admitted to an inpatient psychiatric facility; the state psychiatric facility is not able to take the patient until Wednesday, but will give recommendations for sedating the patient at the limited service facility.

DRG 253: Fracture, sprain, strain and dislocation of upper arm, lower leg except foot, age > 17 with complications

An elderly long-term care patient fell during an assisted transfer and sustained a midshaft humerus fracture. The patient is restricted to bed and requires assistance with feeding due to other conditions (arthritis of lower extremities and dementia). The patient is not considered a candidate for primary reduction and fixation of the fracture; requires immobilization, monitoring for possible infection, and hospitalization for pain control and monitoring possible pulmonary complications.

If DRGs are an adequate tool for defining appropriateness of care at RPCHs, why not simply divide potential RPCH patients at admission into those with DRGs that should be treated at RPCHs and those that should not be and admit or transfer them accordingly? There are two reasons. First, DRGs, as the name implies, represent groups of diagnoses. The diagnoses exhibit variation in severity and staging of illness within groupings. Therefore, while DRGs might suggest the type of patient, they are not able to predict the complete needs of the particular patient who has been assigned the DRG. Second, it is not possible to assign a DRG on admission. By definition, a DRG is based on "the diagnosis established after study to be chiefly responsible for causing the patient's admission to the hospital" (See 42 Code of Federal Regulations 412.60(c)(1)). Although 72 hours may not be adequate in all cases to render a definitive diagnosis, it is a period of study sufficiently long enough for a practitioner to provide a diagnosis for the purpose of determining the appropriateness of the treatment site. Although the process allows a maximum length of 72 hours for evaluation, a DRG should be assigned and discussed with the PRO as early as is reasonable.

The exceptions review process also permits the development of another program feature. Frequently, rural Medicare patients receive tertiary care services at urban hospitals or rural referral centers. As the intensity of their care diminishes in the final days of their convalescence, these patients could be transferred to settings closer to their homes where they could be more easily supported by family and friends. Existing hospital payment rules discourage this kind of transfer, because the facility that discharges the patient receives the full DRG payment.

The difficulty of transferring a rural patient back to the local community -- even when it is medically appropriate to do so --is continued under the EACH Program's currently proposed rules. Care at RPCHs is limited to 72 hours. There is no way to assure that a patient convalescing from a serious illness and/or procedure will be able to be discharged within that period of time. If the patient is not able to be discharged at the end of 72 hours, the currently proposed rules offer the facility only two choices: transfer the patient to a lower level of care in the community (which may be inappropriate) or transfer the patient back to the full service hospital.

The service limitation proposed in this paper would permit patients to be transferred from EACHs to RPCHs. Patients whose care needs are less intense may be transferred from an EACH to an RPCH after the PRO has reviewed the patient's status and an exception granted for the admission. The care of all patients transferred from EACHs to RPCHs would be subject to mandatory concurrent utilization review. The entry point in the process for patients transferred to the RPCH would be an exceptions review.

The distribution of the financial payment between the EACH and RPCH under the above arrangement remains to be addressed.

The service limitation proposed in this paper may also discourage inappropriate admissions to co-located skilled nursing facilities or swing beds. To retain low intensity acute care patients in facilities beyond 72 hours under the current service limitation, limited service hospitals are likely to discharge some patients to co-located skilled nursing facilities or swing beds. These patients might receive acute care services in these beds despite the fact that the beds are licensed for skilled nursing care. The admissions to co-located skilled nursing facilities or swing beds may not only be inappropriate for the level of care required and for their attempt to sidestep the rules of the program, but they potentially place the facility in financial jeopardy by providing acute care services for skilled nursing services reimbursement rates. Under the proposed method of limiting services, many low intensity patients whose care extends beyond 72 hours would be able to be treated in the acute care portion of the facility and reimbursed accordingly.

Role of the PRO

The system for limiting services proposed in this paper extends the existing hospital functions of PROs to alternative models such as RPCHs. The scope of PRO review for hospitals includes the determination of (1) Whether services are or were reasonable and medically necessary...; (2) Whether the quality of services meets professionally recognized standards of care, (3) Whether services furnished or proposed to be furnished on an inpatient basis could, consistent with the provisions of appropriate medical care, be effectively furnished more economically on an outpatient basis or in an

inpatient health care facility of a different type; (4) The validity of diagnostic and procedural information supplied by the hospital (DRG validation); (5) The completeness, adequacy and quality of hospital care provided; (6) The medical necessity, reasonableness and appropriateness of hospital admissions and discharges; (7) The appropriateness of outlier patients; and (8) Whether a hospital has misrepresented admission or discharge information to "game" the system (See 42 Code of Federal Regulations 466.71(a)).

The proposed Conditions of Participation for RPCHs, however, envision a much narrower role for PROs. According to the Notice of Proposed Rule Making, "The quality and appropriateness of the diagnosis and treatment furnished by doctors of medicine or osteopathy at the RPCH are evaluated by the PRO for the State in which the RPCH is located....The RPCH staff considers the findings of the evaluations, including any findings or recommendations of the PRO, and takes corrective action if necessary" (Federal Register, October 25, 1991, 55407).

Under the system for limiting services proposed in this paper, the PRO would perform four primary functions: (1) determination of the medical necessity for admission, (2) DRG validation, (3) determination of the appropriate site for care, and (4) concurrent review of services provided. The first two of these functions will be performed following discharge. If the care delivered by the RPCH to Medicare patients is deemed to be not medically necessary, payment for the services should be denied. It is anticipated that a large proportion of RPCH inpatient utilization will be attributable to Medicare patients. It is assumed that confining the denial of payment for services delivered unnecessarily to

Medicare patients is sufficient sanction due to the proportionately large volume of Medicare patients.

RPCHs will be required to report DRG assignments on all patients to the PRO. Retrospective validation of DRGs will help assure that RPCHs are not abusing the feature of the system that provides automatic certification for DRGs approved in advance for a continuation of stay. Repeated violations in DRG coding will be reported to the State licensing agency by the PRO.

The final two functions proposed for the PRO will coincide with the patient's stay. If a patient's DRG is not on the list of DRGs approved for treatment at an RPCH, the RPCH may request an exceptions review by the PRO. According to authority that is already granted to PROs, the evaluation of the proper site for care is determined by two criteria: appropriateness of care and economy of cost. The appropriateness of care determination would be made by matching the resources of the RPCH with the services that are necessary to treat a patient with a particular condition. RPCHs would be required to file with the PRO, and periodically update, a report of their institutional capacity to treat patients. The report would include information about the number, training, and delineated privileges of medical staff; the number, training and capacity of nursing and support staff; and an inventory of the availability of medical equipment and the frequency of its use. If the medical staff of the RPCH is properly trained and is supported by a nursing and allied health professional staff that is also adequately trained to meet the needs of the patient, and if the RPCH is adequately equipped to provide the diagnostic and therapeutic services required by the patient, the PRO may find that the RPCH is an appropriate site for care to be delivered. This determination would be made not simply on the basis of the DRG, nor by consulting a list of the RPCH's resources, but would be made in consultation with the RPCH to gather specific information about the condition, prognosis, and wishes of the patient in question.

Information on the cost of RPCHs is not available for comparison with EACHs. However, one might speculate that the costs of providing services in an RPCH for the entire length of stay for conditions for which it is appropriate to do so is less expensive than admitting patients to the RPCH and transferring to an EACH after 72 hours for the two reasons. First, the transfer of the patient will require an ambulance charge that would not be necessary if the transfer were not made. Second, the proposed payment rules for the EACH Program would reimburse the RPCH on a cost-based per diem rate for the number of days of care (up to three) it provided, but would also pay the EACH the full DRG payment for transfers received from RPCHs.

The proposed service limitation also might reduce RPCH per diem costs. A relaxation of the 72-hour maximum length-of-stay rule would result in an increase in RPCH utilization measured in days of care. As the number of days of care increases, the proportion of fixed costs per day decreases, and, assuming variable costs remain constant, the average cost per day also decreases. This could further tip a cost comparison between RPCHs and EACHs in favor of RPCHs.

The PROs also would perform concurrent utilization review for patients whose care has been extended following an exceptions review and for patients whose stay has been automatically extended but whose length of stay has exceeded the average length of stay

plus one standard deviation for similar DRGs in rural hospitals whose average daily census is ten or fewer. PROs are independent physician-sponsored or physician-access organizations that contract with HCFA to perform PRO reviews. Most of the organizations also provide review services (quality assurance/utilization review) for other third-party insurers. They generally are staffed and equipped to perform the kind of concurrent review of care that is required of the service limitation suggested here. Those that are not staffed and equipped to perform this review, would be permitted to sub-contract with organizations that possess this capability.

performed on all patients regardless of whether they are Medicare patients or not. The PROs could receive payment for these services from two sources: HCFA, by amending the current PRO scope of work to pay for the review of Medicare patients treated at RPCHs; and the States participating in the EACH Program, by contracting with the PROs to provide this set of services for non-Medicare patients treated at RPCHs. The States could reduce their expense of contracting with the PRO for these services by levying a small user fee on RPCHs.

Ability to Satisfy Service Limitation Objectives

The method proposed in this paper achieves all of the objectives of a well-defined limit on inpatient services. The service limitation accommodates local variation in capability. The exceptions process allows flexibility in the application of an upper limit on services. RPCHs are allowed to offer services to patients according to their ability to provide services. There is a lower limit (no cases other than DRGs that are on the

approved list may be treated automatically) and there is an upper limit (no cases with DRGs that are on the unapproved list may be admitted without permission received through a formal exception review process, other than for the 72-hour observation and stabilization period). A facility must first request a waiver of the limit each time it seeks to exceed the lower limit, and, second, it must prove it is worthy of the waiver. Similarly, the ability to administer the service limitation flexibly accommodates practitioner decision-making. The expert panel of clinicians convened for the project were critical of both the length-of-stay limitation and the DRG approach, because of their reliance on rigid, arbitrary decision rules. Patients are transferred under both methods without regard to their condition or prognosis, but on some predetermined criteria that may or may not relate to the case at hand. The proposed system does not allow practitioners to make all of the treatment decisions in RPCHs, but allows the practitioner to participate in deciding where a patient will be treated.

The list of DRGs that are appropriate to be treated in RPCHs was created with the assumption that RPCHs would be minimally staffed and equipped (as defined by the proposed rules for RPCHs). In the professional judgement of the advisory panel, the conditions on this list can be safely treated in RPCHs. The remaining DRGs were judged, a priori, to be inappropriate for treatment in an RPCH unless the facility could provide explicit proof of its ability to provide care and an adequate rationale for doing so. A PROsponsored process of concurrent review is triggered to monitor the care of the patient if an exception is granted. Concurrent review is also triggered for those cases whose stays are automatically extended by virtue of their being on the approved DRG list when they

pass a DRG-specific length-of-stay threshhold. These concurrent reviews are in addition to retrospective PRO reviews of care, State licensure examination, joint EACH/RPCH credentialling, and internal facility-wide quality assurance programming.

Two features of the proposal help to deter "gaming." The first is the DRG validation performed retrospectively by PROs. The PRO will validate each DRG assigned. Explanations will be sought to reconcile differences between the DRG assignment made following the 72-hour evaluation and the discharge DRG, and differences between the DRG assigned by the RPCH and the one assigned by the PRO. Repeated discrepancies will be reported to the State licensing agency. It is likely that DRG validation (and consultation) will have a sentinel effect on RPCH DRG assignment. The second feature that helps limit "gaming" is the requirement to consult with the PRO to obtain an exceptions review and authority to extend the care of a patient. The burden is placed on the RPCH to justify the appropriateness of the site of care. Even the set of approved DRGs is subject to outside, concurrent scrutiny when the length-of-stay passes an established norm.

The flexibility of this method allows RPCHs to retain patients in the community when appropriate, and allows a procedure through which convalescing patients can be reintroduced into the community. Thus, this method of limiting services is very successful at maximizing opportunities for patients to receive care in settings as close to their homes as is appropriate. Maintaining patients in the community, where and when appropriate, makes both clinical and economic good sense.

Finally, the proposed method is reasonably unambiguous. The PRO becomes the arbiter of cases whose DRGs fall on the list of those that may be treated at RPCHs. The decision of the PRO is final and unequivocal. The patient is either certified for an extension of care at the facility or the facility is ordered to transfer the patient. Although the facility has the ability to appeal the first level of review, there is no appeal above the second level of review, that is, the decision of a physician reviewer. Furthermore, to avoid uncertainty, PRO reviewers would be available to consult with RPCH staff on any interpretation of the service limitation.

CONCLUSION

The service limitation for alternative models, such as rural primary care hospitals, proposed in this paper builds upon existing features of the EACH Program and PPS. Specifically, it features the 72-hour length-of-stay limit proposed for RPCHs, uses DRGs as the method for describing patients, and uses the PRO as a quality assurance regulator. These features are used collaboratively in this proposal. Because the proposal "reuses" existing features of the Medicare program, it minimizes the need for elaborate new policies.

Unlike the static length-of-stay limitation for RPCHs as currently envisioned, the proposed method features a clinical basis for approving care. It recognizes the variation that will exist among facilities participating as RPCHs, and attempts to accommodate it. Because the system is clinically-based and flexible, it is likely to be more palatable to providers than the system currently proposed for limiting services.

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APPENDIX 1

Characteristics of FY 1991 Medicare Discharges from Rural Hospitals with Average Daily Census Less than Ten

FY1991 D	DISCHARGES FROM RURAL HOSPITALS WITH AVERAGE DAILY CEN	CENSUS LESS	THAN 10						_	AGE
	DRG	NUM DE CASES	AVERAGE LOS (SD)	% 0F C WITH L	ASES .05 > 4.0	RELATIVE WEIGHT	N OF CADISCH.	ASES TO SNF	DIED (X)	OF HOSP HAVING CASES (N=690)
DRG 89 DRG 127 DRG 140 DRG 14	SIMPLE PNEUMONIA & PLEURISY AGE > 17 WITH CC HEART FAILURE & SHOCK ANGINA PECTORIS SPECIFIC CEREBROVASCULAR DISORDERS EXCEPT TIA ESOPHAGITIS, GASTRO & MISC DIG DISORD AGE > 17 W CC	12,242 11,500 6,027 5,581 5,332	6.2 (4.4) 5.3 (5.7) 3.1 (2.5) 6.2 (8.5) 4.2 (3.1)	79.4 57.9 37.6 57.3	64.5 44.9 23.7 46.3 40.1	1.1658 1.0070 .6226 1.2173	4.5 5.6 11.0 10.0 5.5	13.7 9.3 3.1 24.3 5.7	7.8 6.9 6.9 .3 12.6 1.4	98.3 97.5 90.6 94.3
322	BRONCHITIS & ASTHMA AGE > 17 WITH CC NUTRITIONAL & MISC METABOLIC DISORD AGE > 17 W CC KIDNEY & URINARY TRACT INFECTIONS AGE > 17 WITH CC RESPIRATORY INFECTIONS & INFLAMMAT AGE > 17 WITH CC CHRONIC OBSTRUCTIVE PULMONARY DISEASE	4,088 4,084 3,590 3,511 3,307	5.0 (6.3) 5.4 (5.5) 5.6 (3.7) 7.8 (6.7) 5.0 (4.8)	51.5 61.1 76.7 81.7 58.9	39.9 47.6 59.9 69.7 44.8	.9457 .9378 1.0002 1.7813	47894	7.2 16.1 15.6 18.6 5.9	6.6 2.8 14.5 3.0	86.1 90.1 86.2 79.4 80.9
13 17 18 18	CARDIAC ARRHYTHMIA & CONDUCTION DISORDERS WITH CC G.I. HEMORRHAGE WITH CC SIMPLE PNEUMONIA & PLEURISY AGE > 17 W/O CC MEDICAL BACK PROBLEMS ESOPHAGITIS, GASTRO & MISC DIG DISORD AGE >17 W/O CC	3,075 2,929 2,487 2,276 2,176	3.8 (2.8) 4.7 (3.2) 5.1 (3.8) 4.9 (3.1) 3.3 (2.3)	51.0 67.1 67.2 71.2 43.8	34.1 48.9 50.7 52.5 27.0	.8211 .9735 .7282 .6672 .5198	10.2 11.3 2.7 4.0 4.6	5.3 11.2 9.0 13.6	25.27	888.18 882.3 781.2
DRG 294 DRG 416 DRG 121 DRG 15 DRG 152	DIABETES AGE >35 SEPTICEMIA AGE > 17 CIRCULATORY DISORD WI AMI & C.V. COMP DISCH ALIVE TRANSIENT ISCHEMIC ATTACK & PRECEREBRAL OCCLUSIONS CIRCULATORY DISORD W AMI W/O C.V. COMP DISCH ALIVE	2,123 2,102 2,078 2,058 1,932	5.2 (4.7) 6.7 (9.3) 6.2 (4.0) 3.5 (2.4) 4.7 (2.9)	62.6 60.5 82.7 47.9 69.0	48.0 49.5 67.5 30.3 49.8	.7516 1.5308 1.6210 .6524 1.1667	3.5 8.4 26.1 4.6 32.6	8.5 17.7 10.8 9.1 5.3	2.6 16.2 .0 .4	81.0 75.5 72.2 76.4 78.6
14 13 18 18 27	AIN C ARRHYTHMIA & CONDUCT TONAL & MISC METABOLIC SSTRUCTION WITH CC TIS AGE > 17 WITH CC	1,648 1,535 1,451 1,423 1,323	2.5 (2.0) 2.8 (2.1) 4.1 (4.0) 5.0 (3.9) 5.9 (3.3)	27.5 32.3 48.7 64.6 84.0	15.5 18.8 35.0 48.5 67.5	.5118 .5149 .5303 .9216	6.8 3.0 18.8 4.5	3.5 2.0 8.9 10.2 15.6	1.0 1.0	62.8 74.5 71.0 74.2
328 39 20 20 20 20 20 20 20 20 20 20 20 20 20	RED BLOOD CELL DISORDERS AGE > 17 PULMONARY EDEMA & RESPIRATORY FAILURE KIDNEY & URINARY TRACT INFECTIONS AGE > 17 W/O CC BRONCHITIS & ASTHMA AGE > 17 W/O CC DISORDERS OF THE BILIARY TRACT WITH CC	1,271 1,178 1,073 1,045 1,045	4.2 (3.7) 4.9 (4.0) 4.6 (3.3) 4.0 (2.1) 4.6 (3.3)	52.1 64.0 63.2 62.3 63.7	37.4 48.0 45.6 39.9 46.2	1.3851 6346 6346 9732	6.1 10.7 2.4 1.3 22.3	5.5.7.4 5.2.7.4	21.4 1.1 2.2	66.7 60.4 60.1 59.4 61.7
13131	SYNCOPE 8 PERIPHERA RENAL FAI MAJOR SMA	995 981 905 893 881	3.5 (2.9) 5.9 (4.0) 6.2 (7.8) 11.2 (6.3) 3.0 (3.3)	44.4 78.4 60.9 98.7 33.6	29.4 62.6 49.1 95.5 22.6	.6950 .9118 1.2814 3.1804 1.3920	2.0 16.2 2.9	8.0 12.4 14.1 16.2	.3 24.9 7.1 100.0	58.4 62.8 60.3 42.3 55.7
23 13 8 17	FRACTURES OF HIP & PELV HYPERTENSION RESPIRATCRY NEOPLASMS DYSEQUILIBRIUM G.I. HEMORRHAGE W/O CC	857 855 768 765 739	5.9 (5.9) 3.6 (5.5) 5.7 (5.8) 3.0 (2.1) 3.4 (2.4)	66.1 48.0 64.2 38.4 46.5	52.6 30.9 50.7 22.3 29.1	.8428 .5663 1.2453 .4727 .5723	18.4 4.4 10.7 11.7	29.3 3.6 15.5 2.2 6.4	2.8 .2 28.3 .1	59.7 51.7 53.6 52.2 52.3
	PSE CE	736 735 699 694 686	4.6 (6.3) 7.6 (36.8) 8.4 (7.8) 4.1 (2.9) 4.7 (2.5)	46.6 35.6 82.1 57.0 73.8	35.7 29.8 71.0 39.2 52.7	.7312 .7906 .9074 .7867	10.7 1.8 6.9 3.5 3.9	6.3 10.6 7.6 8.5 7.6	⇒ M;	44.1 -8.0 52.0 50.7

PAGE 2	OF HOSP HAVING CASES (N=690)	499.1 455.1 425.1 2.2	4100000	Nama	97878	31.4 37.5 37.1 33.8 34.5	28.6 32.2 32.3 7.55	26.8 28.8 31.9 31.3	31.3 27.4 29.6 29.6 24.5	3.5	
	x DIED (x)	22555 1975 1975 1975	2.9 2.9 1.8 .7	11.9 10.1 2.0 9.6	7.4 4.7 7.7 1.6	25.6 3 11.0		5.6 32.7 32.7 0	1.0 20.4 4.9 8.8	\$ 15.	
	CASES TO SNF	13.0 47.3 5.7 6.9 24.1	7.74 4.04 7.70	11.0 2.5 7.7 6.9 10.9	15.7 54.4 5.4 5.4 30.1	1.8 15.4 6.7 11.5	1.4 22.7 14.2 5.2 3.4	2.8 6.3 18.4 1.6	15.4 11.1 11.1 37.5	16.3 10.0 16.0	
	% OF ODISCH	6.4 2.1 10.7 3.1 4.5	2.3 12.5 21.1 1.9	8.2 19.8 5.3 5.9	1.82	.7 12.1 5.4 12.1 5.8	12.8	21.9 1.3 10.8 18.6 12.5	13.0 15.0 15.0 1.4	9.6 16.8 5.8 1.1 4.1	
	RELATIVE WEIGHT	. 9792 2.3795 . 7962 1.6872 1.0269	.5006 1.0870 .4988 .6163	1.0888 .5532 .9232 .5882 .9846	1.0066 1.9386 .7190 .7277 1.2480	.9076 1.2549 .5252 1.4273	.4476 .9342 1.1643 .7840	.5342 .7382 1.1784 .7422 .3898	.6639 .9548 1.2402 .9372 2.6925	1.6125 .9566 1.6240 .6667	
	CASES LOS >	37.1 69.2 34.8 77.2 65.4	18.9 52.5 27.6 21.5 47.9	48.5 30.1 47.0 65.1 44.8	68.4 90.0 34.2 44.1 67.2	46.8 56.8 18.2 71.0 32.2	10.8 30.8 53.6 46.6 40.9	28.3 25.1 25.4 55.4 17.8 11.4	41.9 57.8 59.2 38.5 83.3	57.1 49.8 73.6 33.7 99.3	
	% OF 0 WITH 1	53.0 81.0 50.1 89.7 82.1	27.1 69.0 45.0 27.0 65.8	64.5 48.3 66.4 83.5 61.4	83.6 96.9 51.6 66.9	67.5 70.3 31.5 84.4 47.5	21.4 36.4 67.4 67.3 62.5	41.5 41.2 68.5 33.0 23.4	58.6 74.0 74.2 47.6 91.9	71.5 66.8 87.5 51.4 99.8	
0	108	3.3) 4.3) 5.4)	3.93 3.23 3.23 3.23	4.0) 2.3) 2.9) 3.5)	3.9) 2.7) 6.3)	2.6) 5.9) 2.1) 4.8) 3.1)	1.6) 53.1) 5.6) 2.6) 2.3)	3.3) 2.3) 6.4) 1.8) 1.5)	3.4) 4.0) 4.6) 11.6) 7.0)	5.1) 3.6) 4.0) 12.5)	
THAN 1	AVERAGE (SD)	4.1 (7.8 (3.9 (7.1 (5.8 (25.8 3.2 4.2 6.7	0.84.84 0.86.86 0.00	86.2 3.85 7.28 7.20 7.20	4.4 (6.3 (6.9 (3.7 (26.644	22.83.25	4.75 6.09 9.00 9.00	6.0 (4.9 (6.6 (3.7 (
ESS THAN 1	ĽΩ	21667	73646	V4748	00918	500044	27922	20 117 115 06 95	857 85 85 85	885 887 882 882	
_	NUM 0 CASE	65 61 61 61	61 60 58 57	4490 488	444 4445 4445	442 382 366 366	33 33 34 24	NEE NE	NNNNN	88888	
	AS		42 SYNCOPE & COLLAPSE W/O CC 04 DISORDERS OF PANCREAS EXCEPT MALIGNANCY 81 G.I. OBSTRUCTION W/O CC 37 TRANSURETHRAL PROSTATECTOMY W/O CC 56 TRANSURETHRAL PROSTATECTOMY WITH CC	41068		198 CHOLECYSTECTOMY W/O C.D.E. W/O CC 172 DIGESTIVE MALIGNANCY WITH CC 25 SEIZUNE & HEADACHE AGE > 17 W/O CC 78 PULMONARY EMBOLISM 425 ACUTE ADJUST REACT & DISTURB OF PSYCHOSOCIAL DYS 36	62 INGUINAL & FEMORAL HERNIA PROCEDURES AGE > 17 3.9 ORGANIC DISTURBANCES & MENTAL RETARDATION 3.5 PLEURAL EFFUSION WITH C 7.7 UNCOMPLICATED PEPTIC ULCER WITH CC 3.5 FFMALE REPRODUCTIVE SYSTEM RECONSTRUCTIVE PROC	33 ATHEROSCLEROSIS W/O CC 61 INGUINAL & FEMORAL HERNIA PROC AGE > 17 W CC 03 MALIGNANCY OF HEPATOBILIARY SYSTEM OR PANCREAS 23 URINARY STONES WITH CC, &/OR ESW LITHOTRIPSY 24 URINARY STONES W/O CC	80 TRAUMA TO SKIN, SUBCUT TISS & BREAST AGE > 17 W CC 19 FEVER OF UNKNOWN ORIGIN AGE > 17 WITH CC 05 DISORDERS OF LIVER EXC MALIG, CIRR, ALC HEPA W CC 12 DEGENERATIVE NERVOUS SYSTEM DISORDERS 13 AMPUTATION FOR CIRC SYS DISORD EXC UPPER LIMB & TOE	403 LYMPHOMA & NON-ACUTE LEUKEMIA W CC 331 OTHER KIDNEY & URINARY TRACT DIAG AGE > 17 W CC 423 OTHER INFECTIOUS & PARASITIC DISEASES OF DIAGNOSES 421 VIRAL ILLNESS AGE > 17 462 REHABILITATION	

FY1991 D	ISCHARGES FROM RURAL HOSPITALS WITH AVERAGE DAILY CEN	SUS LES	S THAN 10							PAGE 3
2	DRG	NUM OF CASES	AVERAGE LOS (SD)	% OF C WITH L	ASES 00S >	RELATIVE WEIGHT	% OF C DISCH.	ASES TO SNF	x in the policy of the policy	OF HOSP HAVING CASES (N=690)
DRG 434 DRG 463 DRG 254 DRG 468 DRG 258	ALC/DRUG ABUSE OR DEP, DETOX OR OTH SYMPT TRT W CC SIGNS & SYMPTOMS W CC FX,SPRN,STR&DIS OF UPARM,LOWLEG EX FT AGE>17 W/O CC EXTENSIVE O.R. PROC UNRELATED TO PRINCIPAL DIAG TOTAL MASTECTOMY FOR MALIGNANCY W/O CC	256 246 241 232 230	6.0 (6.2) 5.9 (11.1) 4.6 (6.1) 9.2 (6.9) 3.7 (1.6)	65.8 47.2 46.4 91.2 61.3	52.6 358.1 35.5 34.2	.7689 .7297 .4238 3.4238	72.07 67.404	4.3 14.6 19.1 18.5	2.0 3.7 9.5	23.5 26.4 26.5 23.0 22.6
DRG 359 DRG 281 DRG 435 DRG 263 DRG 450	UTERINE & ADNEXA PROC FOR NON-MALIGNANCY W/O CC TRAUMA TO SKIN, SUBCUT TISS & BREAST AGE >17 W/O CC ALC/DRUG ABUSE OR DEP, DETOX OR OTH SYM TRT W/O CC SKIN GRAFT &/OR DEBRID FOR SKN ULCER OR CELLU W CC POISONING & TOXIC EFFECTS OF DRUGS AGE > 17 W/O CC	226 219 217 216 216	4.5 (1.5) 3.4 (2.6) 7.9 (8.3) 10.3 (8.1) 3.1 (2.3)	85.1 43.1 75.8 92.5 39.6	57.2 27.5 64.3 84.7 24.1	.7823 .4167 .5141 2.6866 .4428	6 4 3 3 . 0	2.2 11.4 1.8 35.6	.0 .0 7.9 .0	21.4 23.0 14.9 19.3 24.6
DRG 247 DRG 253 DRG 100 DRG 195 DRG 178	SIGN & SYMPTOMS OF MUSCULOSKEL SYSTEM & CONN TISSUE FX,SPRN,STRN&DIS OF UPARM,LOWLEG EX FT AGE >17 W CC RESPIRATORY SIGNS & SYMPTOMS W/O CC CHOLECYSTECTOMY W C.D.E. WITH CC UNCOMPLICATED PEPTIC ULCER W/O CC	215 214 205 203 201	3.7 (2.7) 4.7 (3.4) 2.6 (1.8) 9.0 (3.9) 3.6 (3.7)	48.6 64.5 29.3 99.2 41.8	32.0 47.1 16.0 95.7 29.3	. 5445 . 7885 . 4983 2.2099 . 5656	0.80 N.H.	111.2 25.2 11.5 13.3	7.504.	22.2 23.6 20.7 18.8 22.5
DRG 257 DRG 477 DRG 154 DRG 325 DRG 346	TOTAL MASTECTOMY FOR MALIGNANCY WITH CC NON-EXTENSIVE O.R. PROC UNRELATED TO PRINCIPAL DIAG STOMACH, ESOPHAGEAL & DUODENAL PROC AGE > 17 W CC KIDNEY&URINARY TRACT SIGNS & SYMPTOMS AGE >17 W CC MALIGNANCY, MALE REPRODUCTIVE SYSTEM, WITH CC	200 200 198 198	4.6 (2.5) 5.9 (8.2) 11.6 (6.6) 4.3 (2.9) 5.4 (3.8)	72.6 55.6 99.0 59.3	51.2 44.5 96.2 41.6 56.6	.9024 1.4338 4.1746 .6673	5.0 5.1 14.1 7.1	9.0 8.5 18.7 11.6	1.0 4.5 11.1 1.0 22.8	20.7 21.6 17.0 22.0 21.6
DRG 176 DRG 69 DRG 244 DRG 475 DRG 92	COMPLICATED PEPTIC ULCER OTITIS MEDIA & URI AGE > 17 W/O CC BONE DISEASES & SPECIFIC ARTHROPATHIES WITH CC RESPIRATORY SYSTEM DIAG WITH VENTILATOR SUPPORT INTERSTITIAL LUNG DISEASE WITH CC	196 195 193 191 186	5.4 (4.0) 3.8 (1.9) 5.1 (3.7) 6.7 (5.4) 5.9 (3.2)	70.9 59.4 67.9 78.4 85.2	54.7 36.0 51.2 64.8 68.6	1.0235 .5156 .7665 3.6094 1.1997	18.4 2.1 2.1 24.1 7.5	7.7 2.6 13.0 7.9 8.6	3.6 1.5 30.4 8.1	22.0 20.3 20.7 12.6 18.3
DRG 16 DRG 358 DRG 467 DRG 350 DRG 418	NONSPECIFIC CEREBROVASCULAR DISORDERS W CC UTERINE & ADNEXA PROC FOR NON-MALIGNANCY WITH CC OTHER FACTORS INFLUENCING HEALTH STATUS INFLAMMATION OF THE MALE REPRODUCTIVE SYSTEM POSTOPERATIVE & POST-TRAUMATIC INFECTIONS	185 182 178 177 165	5.8 (5.1) 5.9 (2.8) 20.2 (66.8) 4.7 (2.7) 6.3 (4.3)	69.2 90.3 66.4 70.8 81.1	54.8 74.5 59.5 50.7 66.3	1.0824 1.1104 .4303 .6731 .9585	6.5 1.6 9.6 5.6	11.9 2.7 10.1 6.8 13.9	5.9 1.1 7.3 3.0	15.7 19.1 7.8 19.3
DRG 149 DRG 202 DRG 150 DRG 300 DRG 398	ALL S & A AL A E DI	163 158 157 156 156	8.3 (3.8) 6.1 (4.9) 10.9 (9.4) 5.8 (4.0) 5.7 (5.7)	98.3 74.9 91.4 78.3 64.5	92.9 60.3 83.7 62.3 51.0	1.5443 1.2231 2.5069 1.1191 1.2080	9.5 3.8 5.8	9.8 8.9 14.0 13.5	13.9 13.9 3.8 5.1	15.9 16.1 17.8 18.3
DRG 426 DRG 211 DRG 256 DRG 159 DRG 160	DEPRESSIVE HIP & FEMUR OTHER MUSCU HERNIA PROCHERNIA PR	155 154 150 149 149	4.4 (3.7) 7.4 (3.2) 3.6 (4.0) 4.6 (3.5) 3.0 (1.9)	56.7 97.6 40.8 61.8 37.5	41.1 90.1 28.9 44.9 21.1	.6241 1.3747 .6409 1.0701 .6156	5.2 1.9 4.7 .0	4.5 60.4 7.3 6.7 2.0	.6 .7 .2 .0	17.7 10.4 16.7 15.5
DRG 245 DRG 94 DRG 413 DRG 240 DRG 129	BONE DEPORTED CONNEC	149 141 141 139 137	7.5 (21.2) 6.6 (4.3) 6.9 (7.9) 5.4 (4.6) 4.0 (5.6)	45.5 84.9 67.1 66.2 40.7	38.0 70.8 55.2 51.1 30.5	.5434 1.2472 1.3299 1.1486 1.2551	2.0 18.4 7.1 4.3 9.5	10.1 15.7 15.6 9.4 1.5	.0 40.4 2.9 68.6	17.0 16.2 17.0 15.5 14.5

7	4	HOSP ING SES 690)	642.12 1.29.95.1	44844 0.0.0.0.0.0.0	143250 62250	9.6	11.6 10.6 11.7 12.0	12.8 11.3 11.9 12.3	10.3 10.1 10.6 9.1 6.4	7.7 7.4 5.7 8.7 9.9	8.4 2.7 7.2
-	PAG	HAV CA	AAA A					HV407	00000	20262	0040
		DIED (%)	25.22	8. 0.4 7.0.8	2.6.90	7.8 1.9 1.0 2.0	4.0 2.0 2.0 14.4	200.70	32.3	6.35.	4
		ASES TO SNF	2.2 18.6 14.8 11.1	12.8 3.2 28.2 12.0	6.3 2.7 7.3 6.6	3.8 5.7 14.6 17.6 2.9	17.2 3.1 23.5 5.1 19.6	27.1 21.7 12.0 13.2 13.6	16.1 5.7 3.5 18.5 2.5	21.5 10.1 12.8 11.5	10.8 9.5 4.1 16.7
		X OF C DISCH.	23.7 7.8 7.0 1.6 3.2	7.2 10.5 5.6 5.1	2.7 .0 10.9 4.6 6.6	10.5 4.8 8.7 2.0 2.0	7.1 6.1 10.2 8.2 15.5	2.1 8.7 25.0 7.7 12.5	8.0 23.0 18.8 3.7 2.5	8.9 1.3 2.6 21.8 3.9	20.3 2.7 2.7 1.6
		RELATIVE WEIGHT	.4697 1.2128 .9606 1.1775 1.0789	.4495 .4608 3.6042 .6673	.9372 .4909 .8184 .9096	.6454 .7350 .8971 .7500	3.0275 1.1141 1.5884 .6484 1.2834	1.6600 .8715 1.2371 .7566 1.0908	1.1312 .4219 .5340 2.7582 .5182	2.0736 1.2922 1.8977 3.3381 5735	.8770 .5704 .7100 .5540
		ASES 05 > 4.0	23.0 46.0 54.8 99.9 52.8	30.4 20.4 81.9 48.3 45.8	44.6 23.4 38.5 30.2 35.2	21.7 54.7 50.0 39.4 28.7	96.3 59.8 80.5 38.1 44.6	70.1 42.4 40.4 41.8 52.3	51.7 20.2 31.4 83.5 13.1	71.8 56.1 35.2 38.6 33.5	41.2 41.3 21.3 17.9 45.4
		% OF C WITH L 3.0	36.1 61.2 67.9 100.0 67.5	46.4 32.7 89.8 67.7 64.3	61.3 39.2 55.5 48.0 52.4	35.0 73.3 72.8 58.3 43.7	99.1 74.3 90.1 61.1 55.5	81.8 56.1 52.0 56.2 66.0	60.0 36.6 40.7 91.9 25.9	82.9 71.6 52.5 51.4 39.6	56.6 60.7 48.1 42.3 67.5
	0	507	4.3) 6.3) 4.8)	2.7) 2.5) 11.1) 2.9) 3.0)	3.5 2.2) 2.1) 2.4) 2.8)	2.4) 2.3) 2.3) 2.7)	5.3) 6.6) 8.5)	7.0) 4.8) 6.5) 5.5)	23.6) 1.9) 7.2) 7.5) 1.6)	7.5) 4.4) 2.8) 41.6)	(3.8) (2.7) (1.3) (1.2) (2.3)
	THAN 1	AVERAGE (SD)	3.0 (4.9 (6.3 (17.8 (3.5 2.8 11.6 11.6 7.5 7.5 7.5	4.6 (3.1 (3.5 (3.9 (34450 3150 3150 300 300 300 300 300 300 300 300 300 3	10.5 6.1 8.8 3.9 6.0	7.9 4.8 5.1 5.8 5.8	10.4 2.9 4.4 9.8 2.4	80.824.8 4.08.40.	44WW4 4000
- 1	S LESS	0F SES	135 129 128 127 126	125 124 124 117	112 111 110 109 106	105 105 103 102	99 98 98 98	96 92 91 88	87 87 83 80	79 78 78 77	74 74 74 75
- 1	ENSU	CAM	}	Ø		_			ບິວ	2)	
	SCHARGES FROM RURAL HOSPITALS WITH AVERAGE DAILY C	A	OTHER DIGESTIVE SYSTEM DIAGNOSES AGE > 17 W/O CC COAGULATION DISORDERS MAJOR CHEST TRAUMA WITH CC ALC/DRUG DEPENDENCE, COMBINED REHAB & DETOX THERA MAJOR SKIN DISORDERS WITH CC	SIGNS & SYMPTOMS W/O CC EPISTAXIS O.R. PROCEDURE FOR INFECTIOUS & PARASITIC DISEASE TENDONITIS, MYOSITIS & BURSITIS OTHER DISORDERS OF NERVOUS SYSTEM WITH CC	ANAL & STOMAL PROCEDURES WITH CC ANAL & STOMAL PROCEDURES W/O CC COMPLICATIONS OF TREATMENT WITH CC OTHER INJURY, POISONING & TOXIC EFF DIAG WITH CC OTHER RESPIRATORY SYSTEM DIAGNOSIS W/O CC	CIRCULA SKIN DI SKIN DI EAR, NC	BILIARY TRACT PROC W CC EXCEPT ONLY CHOLECYST INFLAMMATORY BOWEL DISEASE OSTEOMYELITIS FEVER OF UNKNOWN ORIGIN AGE > 17 W/O CC NEDVOUS SYSTEM NEOPLASMS WITH CC	T TISS & BREA OR & COMA OMA, COMA < 1 AGE > 17 W CC TRACT NEOPLAS	ERS WITH CC NGS & SYMPT AGE > 17 W/O TRACT DIAG AGE > 17 W/O C O.R. PROCEDURES WITH CC S W/O CC	OTHER CIRCULATORY SYSTEM O.R. PROCEDURES PROSTATECTOMY WITH CC LOWER EXT&HUMER PROC EXC HIP, FOOT, FEMUR >17 W/O ACUTE LEUKEMIA W/O MAJOR O.R. PROCEDURE AGE > 17	2 S S
	91 DIS	<u>.</u>	189 397 83 437 272			145 283 73	193 179 238 420	269 269 283 284 284 284 284	274 326 332 170 311	12 30 30 47	1 2 2 4 4 1 4 1 4 1 1 1 1 1 1 1 1 1 1 1
1	FY19	•	DRG DRG DRG DRG	DRG DRG DRG	DRG DRG DRG	DRG DRG DRG DRG	DRG DRG DRG	DRG DRG DRG	DRG DRG DRG DRG	DRG DRG DRG DRG	DRG DRG DRG DRG DRG

PAGE 5	OF HOSP HAVING CASES (N=690)	8.8 9.8 9.8 0.8	9.0 7.5 8.1 7.5	4000 7.2.2.7.00 7.2.2.7.00	7.8 7.4 7.7 7.0	7.5 7.7 7.0 7.0 8.8	46625 5.110 7.410	7.000v 4.1.1.4.8	0.0.44 4.0.0.0	φυυ _ν αναν _ν
	n DIED (%)	23.9 17.1	.0 1.5 4.5	1.5 3.2 10.0	.0 .0 5.3 12.3	3.6 1.8 5.7 5.0	2.0	4. 0.000	24.00	. 2 0 % 0 ;
	CASES TO SNF	12.7 26.8 14.3 4.3	9.0 4.5 16.7 18.2 21.5	9.2 1.6 8.3 8.3	13.6 13.6 3.5 7.0 3.5	21.4 12.7 23.6 7.5	9.4 0 12.0 12.5	63.4 8.5 8.5 8.5 8.5 8.5 8.5 8.5	13.3 8.9 113.3 29.5 27.3	.0 13.6 .0 4.8
	NOSP	2.8 16.9 17.1 4.3	4.5 3.0 7.7	1.5 3.2 6.5 18.3	5.1 3.4 15.8 7.0 12.3	3.6 23.6 21.8 5.7 1.9		44.00.00	15.6 6.7 6.7 25.0	.0 11.4 .0 .7
	RELATIVE WEIGHT	7139 1.1681 .6218 .4145	.4291 .6575 1.4341 1.0435 2.3804	2.4973 .4776 .7766 1.9348	1.2558 .4911 .6029 .5872	1.5499 .5525 1.0974 2.1733	1.3909 1.0782 7491 7021	2.2533 .5648 1.2931 1.2042	.7156 .4410 .5923 2.8874 1.4112	.8562 .5274 .7597 .4187 1.1190
	CASES LOS >	33.4 56.7 36.6 16.3	16.6 37.7 59.4 72.3 82.4	67.3 9.2 39.2 59.1 41.0	70.8 36.6 38.6 35.6 41.2	74.9 24.6 50.2 96.7 50.8	81.6 99.8 24.4 39.6 28.5	71.7 19.2 70.2 16.9 64.4	45.2 31.6 51.6 90.9 69.8	61.0 32.5 32.9 19.1 49.7
	X OF C	42.3 55.0 55.0	31.7 58.7 75.1 85.8	85.8 18.6 59.5 74.1 54.8	84.0 55.2 61.3 46.4 55.2	86.1 36.9 61.6 99.5 74.7	93.8 100.0 42.4 52.5 39.2	80.1 33.0 87.5 26.9 79.6	53.2 47.9 68.2 97.2 85.6	79.7 48.8 58.0 30.0 64.5
THAN 10	VERAGE LOS (SD)	5.0 (9.2) 7.1 (8.2) 3.9 (2.6) 2.7 (1.5) 4.0 (3.0)	2.7 (1.7) 3.9 (2.3) 5.8 (4.2) 6.8 (4.5) 1.2 (10.4)	5.5 (2.7) 2.1 (1.5) 4.0 (2.4) 5.9 (4.6) 4.6 (4.6)	7.0 (5.0) 3.9 (2.6) 3.9 (2.1) 4.6 (6.4) 4.6 (4.4)	8.1 (6.3) 3.2 (3.0) 6.5 (8.5) 8.5 (3.3) 4.4 (2.1)	6.6 (3.1) 16.3 (7.9) 3.2 (2.0) 4.6 (5.0) 3.7 (4.6)	2.8 (2.1) 5.7 (2.1) 5.7 (2.8) 2.5 (2.5) 6.1 (4.2)	9.1 (23.2) 3.6 (2.8) 5.1 (3.8) 8.8 (4.6) 6.0 (3.4)	5.3 (3.0) 3.7 (2.8) 3.6 (1.7) 2.7 (2.7) 5.2 (4.6)
LESS	NUM OF A' CASES	71 71 70 69	67 67 66 66 1	652 60 60 60 60	559 57 57 57	50 50 50 50 50 50 50 50 50 50 50 50 50 5	53 52 50 48	444 466 5466 5466	ተቀቀቀ ተቀቀቀ	444 475 475 475
DISCHARGES FROM RURAL HOSPITALS WITH AVERAGE DAILY CENSUS	DRG	1 CONCUSSION AGE > 17 WITH CC 6 MALIGNANCY, FEMALE REPRODUCTIVE SYSTEM WITH CC 3 DIGESTIVE MALIGNANCY WITH W/O CC CONCUSSION AGE > 17 W/O CC 8 RENIGN PROSTATIC HYPERTROPHY WITH CC	EX.SPRN, STR&DISL OF FOREARM, HAND, F MAJOR SKIN DISORDERS W/O CC MINOR BLADDER PROCEDURES WITH CC NON-EXTENSIVE BURNS W/O O.R. PROCE OTHER RESP SYSTEM O.R. PROCEDURES	S PERM CARD PAC 7 ALLERGIC REAC 5 DENTAL & ORAL 0 NERVOUS SYSTE 3 ALCOHOL/DRUG	SEPTIC A TRAUMATI DISORDER NON-SPEC LYMPHOMA	4 UPPER LI 9 TRAUMA S 5 FRACTURE 4 APPENDEC 1 PENIS PR	UTERINE, ADNI ALC/DRUG DEPI THYROID PROCI FX, SPRN & D	SKIN GRA OTHER DI APPENDEC TESTES P PERITONE	8 12 12 13 13 13 13 13 13 13 13 13 13 13 13 13	55 UTERINE, ADNEXA PROC FOR NON 69 MENSTRUAL & OTHER FEMALE REF 67 APPENDECTOMY W/O COMPLICATEI 55 OTHER INJURY, POISONING & TC 64 EAR, NOSE, MOTH & THROAT MAL
FY1991		DRG 31 DRG 366 DRG 173 DRG 373	272 273 30 46	111 444 128	DRG 24 DRG 26 DRG 20 DRG 26	DRG 11 DRG 23 DRG 23 DRG 16	W4000		20210	NWH4

GE 6	HOSP VING ASES =690)	5.55.0 5.25.0 5.25.0		4 4 2 5 1 1 6 1 6 1 6 1 6 1 6 1 6 1 6 1 6 1 6	44444 v.v.o.i.v.	7444 1.68333	31.23 3.65 3.66 3.66	พ.พ.พ.พ พ.∞.ช.ษ.พ.	32.3 3.2 3.2 5.2	9.6.
PA(x 0F HA/ DIED C/ (x) (N	22.4 34.1 7.5 7.7 38.5	2.6 .0 2.7 2.7 .0	11.4 .0 .0 .0	80000 8000	3.1 .0 6.3 .0	12.9 .0 .0	0.01	6.9 3.6 3.7 0.0	c :
	ASES TO SNF	19.5 29.3 2.5 7.7 15.4	10.5 21.1 32.4 35.1 21.6	14.3 2.9 111.8 20.6 2.9	5.9 8.8 3.0 6.1	12.5 9.4 9.4 3.2 25.8	22.6 6.5 3.3 6.7	16.7 6.7 6.7 .0 20.0	10.3 25.0 3.6 3.7 50.0	12.0
	X OF CADISCH.	4.9 12.2 5.0 46.2 10.3	2.6 2.6 5.4 5.4	2.9	5.9 15.2 3.0 15.2	15.6 15.6 3.2 6.5	33.20	ж. 0.0.0.	6.9 .0 .14.3 .0	24.0 8.0 0.0
	RELATIVE WEIGHT	1.9377 14.1506 .8028 .7545	.5693 2.2177 4.4412 3.1641 1.2982	3.0063 .9379 .8044 .5583	2.2167 .7757 .6834 .6551	1.2933 .6382 1.8218 .8524 4.2703	1.3547 2.1027 .6028 1.5241	2.5777 1.5472 1.2562 .5295 1.6878	.6709 1.7255 4177 1.7509 1.7471	.7375 1.0817 .4049 .9233 1.8748
	ASES > 6.0	63.9 96.6 51.9 36.9 50.2	73.6 79.6 89.7 84.7 74.1	79.3 27.3 15.1 31.4 33.8	82.9 43.7 43.4 31.1 51.8	53.9 28.2 54.2 84.0	90.1 74.8 62.2 34.3 52.9	93.9 83.4 89.5 14.5	47.5 77.8 33.7 98.6 81.0	34.3 38.0 34.5 59.1 48.3
	% OF C WITH L 3.0	77.8 98.6 72.1 47.0 62.4	80.3 90.5 92.8 84.9	87.6 39.0 29.7 49.9 54.5	92.4 68.2 61.1 43.6 68.0	71.7 42.5 64.7 67.1	97.4 85.3 75.1 48.7	98.5 93.5 97.9 26.9 88.1	67.6 89.4 48.6 99.9 92.4	49.0 53.8 46.9 72.1 68.5
THAN 10	(SD)	6.5 (5.2) 6.9 (18.2) 4.7 (2.7) 5.1 (7.9) 6.1 (7.1)	20.5 (42.0) 7.8 (5.0) 9.1 (5.3) 9.7 (7.2) 8.5 (7.3)	11.6 (12.0) 3.4 (3.7) 2.6 (1.6) 3.6 (2.3) 3.7 (2.1)	8.4 (5.5) 4.1 (2.0) 4.4 (3.1) 3.8 (4.0) 5.2 (3.9)	5.1 (3.3) 3.4 (2.9) 7.7 (11.0) 4.3 (2.4) 9.5 (6.9)	7.7 (3.5) 8.8 (7.7) 6.8 (6.2) 3.9 (3.5) 5.0 (3.3)	9.0 (4.4) 7.6 (4.3) 6.8 (2.6) 2.5 (1.8) 8.1 (6.0)	4.5 (2.7) 7.5 (4.8) 3.8 (3.3) 8.5 (2.8) 7.2 (4.0)	3.9 (3.4) 4.1 (3.4) 4.1 (4.6) 6.6 (6.3) 4.5 (2.7)
S LESS	M OF A ASES	41 41 2 40 39 39	337788	200000 200000 200000	22222 24222	32 32 31 31	31 31 30 30	300 300 300 300 300	29 28 27 27 26	26 25 25 25 24
DISCHARGES FROM RURAL HOSPITALS WITH AVERAGE DAILY CENSU	NUM DRG CA	OTHER O.R. PROCEDURES FOR INJURIES WITH CC TRACHEOSTOMY EXC FOR MOUTH, LARYNX OR PHARYNX DIS INTERSTITIAL LUNG DISEASE M/O CC NERVOUS SYSTEM NEOPLASMS M/O CC OTHER MYELO DIS OR POOR DIFF NEOPL DIAG M/O CC	AFTERCARE W/O HISTORY OF MALIG AS SECONDARY DIA OTHER VASCULAR PROCEDURES W CC PANCREAS, LIVER & SHUNT PROCEDURES WITH CC WND DEBRID & SKN GRFT EXC HAND, FOR MUSC &CONN TISS SKIN GRAFT &/OR DEBRID FOR SKN ULC OR CELLU W/O CC	MAJOR CHEST PROCEDURES VEIN LIGATION & STRIPPING MAJOR SHOULD/ELBOW PROC,OR OTH UPPER EXTR PROC W CC SPRAINS, STRAINS, & DISLOCAT OF HIP, PELVIS & THIGH DIABETES AGE 0-35	UTERI VAGIN PLEUR OTHER	SPINAL TESTES OTHER MULTIPL		RECTAL RESECTION WIT STOMACH, ESOPHAGEAL APPENDECTOMY W COMPI D&C, CONIZATION EXCL OTHER FEMALE REPRODI		
FY1991 I		DRG 442 DRG 483 DRG 93 DRG 11 DRG 114	44400	DRG 75 DRG 119 DRG 223 DRG 237 DRG 295	35 36 37 39	488	319		34554	30 233 34 36 21

FY1991 D	DISCHARGES FROM RURAL HOSPITALS WITH AVERAGE DAILY CE	ENSUS LESS	THAN 10							PAGE 7
		C	- L (% OF WITH	CASES LOS >	VITA	% OF C DISCH.	ASES TO	ш	OF HOSP HAVING
	DRG	CASES	AVEKAGE LUS (SD)	3.0		MEIGHT	0	SNF	(%)	=69 =69
DRG 224 DRG 347 DRG 440 DRG 443 DRG 843	SHOULD, ELBOW OR FOREARM PROC, EXC JT PROC, W/O CC MALIGNANCY, MALE REPRODUCTIVE SYSTEM, W/O CC WOUND DEBRIDEMENTS FOR INJURIES OTHER O.R. PROCEDURES FOR INJURIES W/O CC MAJOR CHEST TRAUMA W/O CC	22 23 23 23	2.6 (2.0) 3.5 (2.8) 6.4 (5.3) 3.2 (2.7) 4.5 (3.7)	29.8 44.2 75.5 40.0 59.2	17.2 29.2 61.6 25.9 43.4	.6306 .5016 1.8492 .7595	16.7 4.3	8.3 12.5 13.0 21.7	25.0	2.2 3.3 3.0 3.2
DRG 44 DRG 215 DRG 228 DRG 335 DRG 400	ACUTE MAJOR EYE INFECTIONS BACK & NECK PROCEDURES W/O CC MAJOR THUMB OR JT PROC,OR HAND OR WRIST PROC W CC MAJOR MALE PELVIC PROCEDURES W/O CC LYMPHOMA & LEUKEMIA W MAJOR O.R. PROCEDURE	22222	4.3 (2.4) 4.1 (3.1) 2.5 (2.1) 7.1 (2.5) 8.1 (6.0)	66.8 28.4 99.0 88.6	45.4 39.4 16.5 93.2 77.9	.6119 1.1156 .8015 1.3574 2.5985	44 44 88088	4444 8.80.80.80	0.000%	3.0 .6 1.6 1.7
DRG 476 DRG 227 DRG 199 DRG 226 DRG 275	PROSTATIC O.R. PROC UNRELATED TO PRINCIPAL DIAG SOFT TISSUE PROCEDURES W/O CC HEPATOBILIARY DIAGNOSTIC PROCEDURE FOR MALIGNANCY SOFT TISSUE PROCEDURES WITH CC MALIGNANT BREAST DISORDERS W/O CC	21 20 18 18	8.1 (4.9) 2.4 (1.6) 10.6 (6.6) 4.9 (3.2) 4.1 (2.6)	93.7 25.5 97.1 69.9 59.0	84.5 12.7 91.9 51.8 39.9	2.2175 .6791 2.4049 1.3613	4.8 .0 11.1 5.6	9.5 5.0 111.1 11.1	4.8 .0 .11.1 .0 .16.7	22.52
DRG 319 DRG 95 DRG 373 DRG 7 DRG 276	KIDNEY & URINARY TRACT NEOPLASMS W/O CC PNEUMOTHORAX W/O CC VAGINAL DELIVERY W/O COMPLICATING DIAGNOSES PERIPH & CRANIAL NERVE & OTHER NERV SYST WITH CC NON-MALIGNANT BREAST DISORDERS	18 17 17 16	7.8 (12.3) 2.7 (1.4) 2.1 (9) 9.1 (6.7) 4.8 (3.5)	62.6 33.0 13.7 91.4 64.9	52.6 14.8 3.7 82.4 48.0	.5455 .6108 .3169 2.7185 .5731	22.2 23.5 0	5.6 5.9 12.5	16.7	2.6 2.3 2.5 2.0 1.9
DRG 45 DRG 136 DRG 233 DRG 266 DRG 304	NEUROLOGICAL EYE DISORDERS CARDIAC CONGEN & VALV DISORDERS AGE > 17 M/O CC OTHER MUSCULOSKELET SYS & CONN TISS O.R. PROC M CC SKIN GRAFT %/OR DEB EX FOR SKIN ULC OR CELLU M/O CC KIDNEY, URETER & MAJOR BLAD PROC FOR NON-NEOPL M CC	c 115	2.9 (1.5) 2.9 (1.1) 8.5 (6.9) 3.5 (2.7) 8.6 (4.5)	37.5 40.8 86.5 45.6 97.0	18.0 15.3 76.0 29.8 90.4	. 5938 . 5434 1.9873 . 6814 2.3986	20.0 6.7 13.3 6.7	6.7 6.7 20.0 6.7 13.3	13.3	2.0 2.0 1.9 1.9
DRG 459 DRG 27 DRG 260 DRG 261 DRG 367	NON-EXTEN BURNS M MOUND DEBRID OR OTHER O.R. PROC TRAUMATIC STUPOR & COMA, COMA > 1 HR SUBTOTAL MASTECTOMY FOR MALIGNANCY W/O CC BREAST PROC FOR NON-MALIG EXC BIOPSY & LOCAL EXCIS MALIGNANCY, FEMALE REPRODUCTIVE SYSTEM W/O CC	111115	9.9 (9.7) 3.4 (2.9) 3.0 (1.4) 2.4 (1.7) 4.5 (2.0)	85.2 41.9 42.0 26.5 77.0	75.8 28.0 19.3 14.0 52.9	1.9637 1.3566 .5720 .6749	14.3 0 7.1	40.0 14.3 .0 .0	14.3 .0 35.7	2.0 2.0 1.9 2.0 1.9
DRG 153 DRG 171 DRG 222 DRG 230 DRG 265	MINOR SMALL & LARGE BOWEL PROCEDURES W/O CC OTHER DIGESTIVE SYSTEM O.R. PROCEDURES W/O CC KNEE PROCEDURES W/O CC LOCAL EXCIS & REMOV OF INT FIX DEVICES OR HIP&FEMU SKIN GRAFT &/OR DEB EXC FOR SKIN ULC OR CELLU W CC	R 1133	6.8 (2.8) 6.8 (8.0) 6.3 (7.1) 3.3 (2.3) 6.4 (4.5)	96.7 66.5 65.3 44.4 81.2	86.9 54.8 53.1 27.7 66.9	1.0534 1.1303 .9721 .9278 1.3860	7.7 .0 .0 .0 .7.7	7.7 7.7 23.1 7.7	15.4 .0 .0	1.9 1.7 1.7 1.9
DRG 303 DRG 428 DRG 200 DRG 285 DRG 305	KIDNEY, URETER & MAJOR BLADDER PROC FOR NEOPLASM DISORDERS OF PERSONALITY & IMPULSE CONTROL HEPATOBILIARY DIAGNOSTIC PROC FOR NON-MALIGNANCY AMPUTAT OF LOWER LIMB FOR ENDO, NUTRIT, &METABOL DISKIDNEY, URETER&MAJOR BLAD PROC FOR NON-NEOPL W/O CC	13 12 12 12	8.5 (4.8) 7.6 (6.7) 11.7 (10.9) 8.8 (5.0) 4.2 (2.4)	96.0 80.5 90.7 96.1 63.9	88.6 68.7 83.3 88.9 43.0	2.6645 .7831 2.7960 2.7210 1.1821	0.0%0.0	7.7 15.4 8.3 25.0	7.7	11.6
DRG 402 DRG 424 DRG 50 DRG 234 DRG 259	LYMPHOMA & NON-ACUTE LEUKEM W OTH O.R. PROC W/O CC O.R. PROCEDURE W PRINCIPAL DIAG OF MENTAL ILLNESS SIALOADENECTOMY OTH MUSCULOSKELET SYS & CONN TISS O.R. PROC W/O CC SUBTOTAL MASTECTOMY FOR MALIGNANCY WITH CC	12 11 11 11 11 11 11 11 11 11 11 11 11 1	2.9 (1.3) 9.1 (8.0) 2.5 (2.2) 3.8 (2.2) 4.5 (3.6)	39.6 86.4 28.8 57.8 60.7	17.6 76.5 17.2 37.0 44.5	.8701 2.3695 .6625 1.0365	0,000	8.3 8.3 27.3	00000	1.6

		50								
LAGE 0	OF HOSP HAVING CASES (N=690)	1.6 1.3 1.3		1.3	1.0	1.0	1.0	99.6.6.	6.L.L.W.	
	x DIED (x)	0.000		22.2 .0 .0 .0	0.000	00000	14.3	16.7	00000	20.0
	ASES TO SNF	.0 18.2 9.1 20.0	10.0 30.0 11.1	44.4 .0 .0 .0 .25.0	25.0 25.0 25.0 .0	0 .0 14.3 28.6	14.3 0 16.7 66.7 16.7	16.7	20.0 20.0 20.0	20.0
	z OF C/ DISCH.	18.2 9.1 10.0	10.0 11.1 22.2	100.00	12.5	.0 .0 28.6 14.3	14.3 .0 .0	16.7	40.0 .0 .0	20.0
	RELATIVE WEIGHT	.7263 .5838 1.1046 .5741	.4607 .6960 .6162 .6143 .2.2510	2.6566 2.0198 .8268 .4868 1.6301	1.8350 .5403 .4944 1.0079	.6590 1.0595 1.0289 3.6795 1.6189	5.2491 .4732 2.3980 2.0321 .7194	2.8387 .8174 1.0492 .6440 3.9835	1.3259 1.4685 1.5101 .3579	.7846 1.6957 1.7379 3.2912 6872
	ASES 0S > 4.0	42.4 20.1 43.7 34.4 34.2	111.6 29.3 6.8 33.3 65.0	94.8 70.2 49.9 86.5	50.3 3.4 31.6 19.5 25.4	41.0 23.9 23.6 97.7 98.0	97.0 1.7 76.7 55.7 54.8	59.8 44.4 34.9 43.6 94.4	82.6 27.4 78.8 111.7	94.2 22.5 83.3 93.7
	MITH L	52.9 34.9 58.6 52.8	23.8 50.1 15.3 49.6 81.8	98.4 84.4 59.3 96.1	68.3 8.5 44.9 48.6 40.6	61.9 38.1 38.9 99.5	99.3 8.0 89.3 72.6 67.6	78.4 78.7 55.3 53.7 98.0	98.8 43.0 84.9 30.6	99.6 31.9 94.4 98.1 27.1
0	507	8.0) 2.0) 4.1) 2.5)	1.5) 1.9) 1.3) 3.4)	6.9) 4.2) 13.3) 3.2)	3.2) 1.0) 3.5) 2.4)	25.25.3	5.5) (8.8) (4.1) (6.0)	(2.9) (1.2) (2.2) (8.5)	(1.1) (2.4) (34.3) (1.1)	(1.6) (3.5) (3.3) (5.6) (2.6)
THAN 1	AVERAGE (SD)	5.5 2.8 3.7 5.7 5.7	2.3 3.4 1.9 5.7	11.4 (6.4 (7.7 (1.3 (7.0 (3.16	4.0 C 3.0 C 3.0 C 111.1 C		5.1 4.0 5.7 12.3	5.0 3.2 19.8 1.2	6.2 2.8 6.8 10.0
SUS LESS	NUM OF A	1111111011	10 10 9	00008	∞ ∞ ∞ ∞ ∞	~~~~	7999	9999	<u> </u>	សសលសល
I DISCHARGES FROM RURAL HOSPITALS WITH AVERAGE DAILY CENSUS	DRG	45 OTHER MALE REPRO SYSTEM O.R. PROC EXCEPT FOR MALIG 52 OTHER MALE REPRODUCTIVE SYSTEM DIAGNOSES 08 MYELO DISORD OR POOR DIFF NEOPL W OTHER O.R. PROC 22 NASAL TRAUMA AND DEFORMITY	13 URETHRAL PROCEDURES, AGE 32 OTHER MENTAL DISORDER DI 42 INTRAOCULAR PROCEDURES E 28 URETHRAL STRICTURE AGE > 01 LYMPHOMA & NON-ACUTE LEI	006 61 61 67	21 KNEE PROCEDU 29 HAND OR WRIS 62 BREAST BIOPS 89 PARATHYROID 62 CIRCHMCISION	53 SINUS & MASTO 63 OTHER EAR, NO 77 OTHER RESP SI 15 PERM CARD PAI	86 OTHER O.R. PROCEDURES FOR MULTIPLE SIG TRAUMA 39 LENS PROCEDURES WITH OR WITHOUT VITRECTOMY 11 MAJOR CARDIOVASCULAR PROCEDURES W/O CC 16 BIOPSIES OF MUSCULOSKELETAL SYS & CONNECTIVE TO SELVE TO SELVE THE STANDARD STA	2 OTHER ENDOCRINE, NUTRIT & METAB O.R. PROC b 2 URETHRAL PROCEDURES, AGE > 17 WITH CC 4 OTHER MAL REPRODUCTIVE SYSTEM O.R. PROC FOR 5 D&C, CONIZATION & RADIO-IMPLANT, FOR MALIGN 8 NOM-EYTENSIVE RIRNS W SKIN GRAFT	20 OTHER VASCULAR PROCEDURES 21 VIRAL MENINGITIS 40 EXTRAOCULAR PROCEDURES EXC 41 HYPHEMA 42 HYPHEMA	1 SIMPLE PNEUMONIA & PLEURISY AGE 0-17 8 CARDIAC PACEMAKER DEVICE REPLACEMENT 2 PANCREAS, LIVER & SHUNT PROCEDURES M/O C 2 SPLENECTOMY AGE >17 1 HAND PROCEDURES FOR INJURIES
FY1991		DRG 34 DRG 35 DRG 46 DRG 7	1 wa wa	י ללל ר	1 00000	, –				
U.	•									

1	PAGE 9	OF HOSP HAVING CASES (N=690)	9.9.9.9.	99494	14484	a'a'a'w'	aaaww.	พ่พ่พ่พ่พ่	мимим	wwwww	wwdii
		% DIED (%)	.0 25.0 25.0	25.0	00000	00000	33.3	00000	50.0	0.0.0.0	0.
		ASES TO SNF	25.0	25.0 50.0 50.0	00000	333.3	33.3 100.0	50.0	50.0 50.0 50.0	50.0	50.0
		% OF C DISCH.	0.000	00000	33.3 33.3	0.0000	33.3	00000	0.0000	00000	100.00 .00.00 .00.00
7		RELATIVE WEIGHT	. 7951 . 5871 2.0163 . 5396	1.0237 .7355 .3706 3.0632	.6434 .8708 .8197 1.1973	1.0601 .7278 2.0590 .6456	1.5719 1.5267 1.1904 2.4577	1.0899 1.2743 5406 5125 5094	2.3034 .9139 .4416 .6334	. 5235 . 3827 . 3027 . 4569 . 5916	1.6731 3.1795 1.9790 1.5444 6.1581
		ASES .05 > 4.0	2.9 44.1 69.1 48.0 37.6	81.3 25.0 70.4 95.4 36.3	1.3 68.3 18.1 73.8 46.8	100 92.6 99.2 88.6 35.0	5.5 58.6 41.8 92.3	97.3 79.3 21.3 35.4 11.4	93.9 99.7 1.2 99.7 11.4	4.0 21.3 52.5 22.9	96.0 88.9 50.0
		% OF C WITH L 3.0	12.1 71.8 79.3 61.5	98.4 39.6 79.6 99.1 54.0	13.2 81.9 28.1 91.9 64.9	100.0 96.3 100.0 100.0	15.8 90.5 60.2 99.0 5.2	99.1 90.6 33.4 54.8 21.9	98.1 99.9 5.2 100.0 21.9	23.5 63.5 65.5	99.3
1	10	E LOS	.8) 1.6) 9.0) 4.8) 1.9)	1.2) 2.3) 11.6) 4.1) 2.5)	.6) 2.3) 2.1) 2.9)	1.5) 16.7) 1.0) 1.1)	(1.0) (2.6) (2.6) (2.1)	(10.6) (4.2) (2.1) (2.1) (1.4)	(5.7) (9.9) (1.4) (1.4)	(7. 2.1) (6.4) (1.4) (1.4)	(3.5) (6.4) (0.7)
	THAN	AVERAGI (SD	2.0 3.0 3.0 3.0 3.0	3.0 3.0 3.7 0.0 0.0	2.602.4 2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.	8.3 (17.3 (6.0 (4.7 (3.7 (2.04.0.1 1.5.03.0	15.5 7.0 2.5 2.5 2.0	10.0 18.0 7.0 2.0	13.55	81.84 0.000
1	LESS	OF ES	ひひひひひ	44440	ммммм	ммммм	MMM00	00000	00000	44444	7777
- 4	S	M AS									
	991 DISCHARGES FROM RURAL HOSPITALS WITH AVERAGE DAILY CENSUS	NUM DRG CA	DRG 37 ORBITAL PROCEDURES DRG 51 SALIVARY GLAND PROCEDURES EXCÉPT SIALOADENECTOMY DRG 112 PERCUTANEOUS CARDIOVASCULAR PROCEDURES DRG 298 NUTRITIONAL & MISC METABOLIC DISORDERS AGE 0-17 DRG 329 URETHRAL STRICTURE AGE > 17 W/O CC	370 431 485 8	36 RETINAL PROCEDURES 67 EPIGLOTTITIS 71 LARYNGOTRACHEITIS 124 CIRCUL DISORD EXC AMI, W CARD CATH & CO	168 MOUTH PROCEDURES WITH CC 279 CELLULITIS AGE 0-17 353 PELVIC EVISCERATION, RAD 371 CESAREAN SECTION W/O CC 383 DIHFR ANTEPARTUM DIAGNOS	394 OTHER O.R. PROC OF BLOOD AN 439 SKIN GRAFTS FOR INJURIES 490 HIV W OR W.O OTHER RELATED 4 SPINAL PROCEDURES 50 TONSTHECTOMY 8/OR ADENOIDE	81 RESPIRATORY INFECTI 117 CARDIAC PACEMAKER R 169 MOUTH PROCEDURES W/ 184 ESOPHAGITIS, GASTRO 187 DENTAL EXTRACTIONS	201 OTHER HEPATOBILIARY O 212 HIP & FEMUR PROCEDURE 291 THYROGLOSSAL PROCEDUR 322 KIDNEY & URINARY TRAC 361 LAPAROSCOPY & INCISIO	372 VAGINAL DELIVERY W COMP 381 ABORTION W D&C, ASPIRAT 384 OTHER ANTEPARTUM DIAG W 411 HISTORY OF MALIGNANCY W	457 482 489 56 105

	Serve Total Serve	-									1 HO A O
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	DRG	NUM OF CASES	AVERAGE (SD)	507	% OF CA WITH LO	1SES 1S > 4.0	RELATIVE WEIGHT	x OF C DISCH.	CASES TO SNF	n DIED (%)	OF HOSF HAVING CASES (N=690
DRG 252 DRG 282 DRG 293 DRG 302 DRG 314	FX,SPRN,STRN&DISL OF FOREARM, HAND, FOOT AGE 0-17 TRAUMA TO THE SKIN, SUBCUT TISS & BREAST AGE 0-17 OTHER ENDOCRINE, NUTRIT & METAB O.R. PROC W/O CC KIDNEY TRANSPLANT URETHRAL PROCEDURES, AGE 0-17	9. A \$ 36 E		22222	********		.3454 .3383 1.1528 3.8891	* * * * * *		a tel e e	****
DRG 317 DRG 327 DRG 330 DRG 333 DRG 340	ADMIT FOR RENAL DIALYSIS KIDNEY & URINARY TRACT SIGNS & SYMPTOMS AGE 0-17 URETHRAL STRICTURE AGE 0-17 OTHER KIDNEY & URINARY TRACT DIAGNOSES AGE 0-17 TESTES PROCEDURES, NON-MALIGNANCY AGE 0-17	****	*****		****	****	. 4825 . 5444 . 2754 . 9094	* * * * * *		* * * * *	* #7* * *
DRG 343 DRG 351 DRG 362 DRG 374 DRG 375	CIRCUMCISION AGE 0-17 STERILIZATION, MALE ENDOSCOPIC TUBAL INTE VAGINAL DELIVERY W ST VAGINAL DELIVERY W O.		*****				.3742 .3293 .4921 .5045	*****		* (*): *: * (*)	*****
DRG 377 DRG 378 DRG 385 DRG 386 DRG 387	POSTPARTUM & POST ABORTION DIAGNOSES W.O.R. PROC ECTOPIC PREGNANCY NEONATES, DIED OR TRANS TO ANOTH ACUTE CARE FACILI EXTREME IMMATURITY OR RESP DISTRESS SYND, NEONATE PREMATURITY W MAJOR PROBLEMS	3 ON 10 10 ON				y we k y w	1.0278 .7532 1.2084 3.6039 1.8046			*****	a 3≇ 8≇5 ¥ 6≢
DRG 388 DRG 389 DRG 391 DRG 393 DRG 396	PREMATURITY W/O MAJOR PROBLEMS FULL TERM NEONATE W MAJOR PROBLEMS NORMAL NEWBORN SPLENECTOMY AGE 0-17 RED BLOOD CELL DISORDERS AGE 0-17	ga 19a2 at ga 9an					1.1431 1.3846 .2191 1.5022	X i			* * * * *
DRG 405 DRG 412 DRG 417 DRG 438 DRG 446	ACUTE LEUKEMIA M/O MAJOR O.R. PROCEDURE AGE 0-17 HISTORY OF MALIGNANCY W ENDOSCOPY SEPTICEMIA AGE 0-17 NO LONGER VALID TRAUMATIC INJURY AGE 0-17		9 Jan 1 1 1 1 1				1.0281 .4216 1.0315 .0000		* * * * *	\$ \$ 300 \$ \$ 3	* * * *
DRG 448 DRG 451 DRG 469 DRG 470 DRG 472	ALLERGIC REACTIONS AGE 0-17 POISONING & TOXIC EFFECTS OF DRUGS AGE 0-17 PRINCIPAL DIAGNOSIS INVALID AS DISCHARGE DIAGNOSIS UNGROUPABLE EXTENSIVE BURNS W 0.R. PROCEDURE	* * * * * *				* * * * * *	.3428 .5126 .0000 .0000 13.9563		*****	* * * * *	
DRG 474 DRG 480 DRG 481 DRG 484 DRG 488	NO LONGER VALID LIVER TRANSPLANT BONE MARROW TRANSPLANT CRANIOTOMY FOR MULTIPLE SIGNIFICANT TRAUMA HIV W EXTENSIVE O.R. PROCEDURE	****	* ** * * **	22222	* * * * * *	* * ** * *	.0000 22.8213 15.2890 6.2599 4.3106	*****	* * * * *	* * * * *	೨೫೫೫೫
DRG 491 DRG 492	. MAJOR JOINT & LIMB REATTACHMENT PROC - UPPER EXTR P. CHEMOTHERAPY WITH ACUTE LEUKEMIA AS SECOND DIAG	* *	* *		* *		1.5633			* *	* *

APPENDIX 2

Calculating the Variance of Length of Stay of Cases in a DRG and Percent Cases in a DRG with Length of Stay Greater than Three Days

1. Calculating the Variance of Length of Stay of Cases in a DRG

Assume X_{ij} = LOS of patient j at hospital i in particular DRG

 \overline{X}_i = mean LOS of patients in a particular DRG at hospital i

 \overline{X} = mean LOS of patients in a particular DRG across all hospitals

n_i = total cases at hospital i in a particular DRG

N = total cases at all hospitals in a particular DRG

$$\operatorname{Var}(X) = \frac{1}{N} \sum_{i} \sum_{j} (X_{ij} - \overline{X})^{2}$$

$$= \frac{1}{N} \sum_{i} \sum_{j} (X_{ij} - \overline{X}_{i} + \overline{X}_{i} - \overline{X})^{2}$$

$$= \frac{1}{N} \sum_{i} \sum_{j} (X_{ij} - \overline{X}_{i})^{2} + \frac{1}{N} \sum_{i} \sum_{j} (\overline{X}_{i} - \overline{X})^{2}$$

$$= \frac{1}{N} \sum_{i} (n_{i} - 1) \operatorname{Var}(X_{i}) + \frac{1}{N} \sum_{i} N_{i} (\overline{X}_{i} - \overline{X})^{2}$$

2. Calculating % Cases in a DRG with Length of Stay Greater than 3 Days

Assume X, which is length of stay (LOS) of cases in a DRG, is lognormally distributed with mean \overline{X} , variance σ_X^2

Then Y = log X is normally distributed with mean μ_y , variance σ_y^2 (i.e. Y ~ N (μ_y , σ_y^2)

If \overline{X} and σ_x^2 are known, then μ_y and σ_y^2 can be calculated as follows:

$$\mu_y = 2 \log \overline{X} - \frac{1}{2} \log (\sigma_x^2 + \overline{X}^2)$$

$$\sigma_v^2 = \log (\sigma_x^2 + \overline{X}^2) - 2 \log (\overline{X})$$

Then, the P (LOS > 3) can be found from a standardized normal distribution table as follows:

$$P\{LOS > 3\} = 1 - P\{LOS \le 3\}$$

$$= 1 - \Phi\left(\frac{\log 3 - \mu_y}{\sigma_y}\right)$$