# Florida Agency for Health Care Administration New Section 1115(a) Medicaid Demonstration for Florida Health Care Workforce Sustainability

# Overview

The Agency for Health Care Administration (Agency) is seeking federal authority to implement an innovative Section 1115(a) Medicaid Demonstration to create and expand training programs that will strengthen Florida's health care workforce to meet the growing health needs of our state. Florida is the first state to seek federal support for a targeted, standalone 1115 demonstration program testing innovation across the health care workforce on a broad scale. Florida is committing almost \$1.4 billion which, with federal support, will provide an average of \$617 million each year for five years to build, strengthen, and sustain the health care workforce and incentivize health care professionals to serve Medicaid recipients in medically underserved areas. The impact of this initiative will be both immediate and long-range. Immediate impacts include loan repayment support for over 3,000 doctors, nurses, physician assistants, dentists, dental hygienists, and mental health practitioners who serve Medicaid recipients in medically underserved areas for as many as five years. Long-range effects include expanding resident and student training programs to up to 844 qualified federally qualified health centers, rural health clinics, community mental health centers, and certified community behavioral health centers. This not only expands training opportunities but shifts training to the community settings where there are health care professional shortages. Other long-range impacts also include supporting the indirect costs of nursing education in approximately 13 facilities, which will help grow the nursing workforce.

The demonstration seeks federal matching Medicaid funds for workforce programs authorized through Florida's recently enacted Live Healthy Act (Senate Bill (SB) 7016 (2024)) and budget bill (House Bill (HB) 5003 (2024)):

# Workforce Training Program

The Training, Education, and Clinicals in Health (TEACH) Funding Program will provide funds to participating federally qualified health centers, community mental health centers, certified community behavioral health clinics, and rural health clinics to offset the costs of training resident physicians and health care professional students to become licensed health care providers who serve Medicaid recipients in medically underserved areas.

# • Educational Loan Repayment Programs

- o Florida Reimbursement Assistance for Medical Education (FRAME) Program will repay educational loans for primary care physicians, physician assistants, mental health professionals, licensed practical nurses, registered nurses, and advance practice registered nurses who serve Medicaid recipients in medically underserved areas.
- o *The Dental Student Loan Repayment Program* will repay educational loans for dentists and dental hygienists who serve Medicaid recipients in medically underserved areas.
- Nursing Indirect Medical Education

• The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program will make semi-annual payments to eligible public teaching hospitals to offset the higher patient care expenses and increased complexity of cases resulting from nursing education.

These programs will supplement existing federal initiatives and previously approved Florida programs to address the specific needs of the second-fasted growing state in the nation with a high proportion of older adults and 4.7 million Medicaid enrollees.

# **Statement of Demonstration Purpose**

In this demonstration application, we justify the need for the requested support by providing an overview of federal and Florida health care workforce demands, highlighting Florida's specific health challenges, and describing health care professional workforce development programs that these new initiatives will strengthen.

Health care workforce shortages are widespread nationally. Florida has additional challenges because it is one of the largest and fastest-growing states in the nation. Moreover, Florida is home to a larger percentage of older adults compared to other states. The federal government has recognized the need to invest in the health care workforce and has several initiatives to increase the numbers of health care workers, especially in medically underserved areas. Over the years, Florida Medicaid has made substantial investments in its health care workforce. However, Florida's health care need is outpacing workforce supply similar to what is occurring across the nation. The need for health care professionals particularly impacts people living in poverty who have higher rates of acute and chronic health conditions and access challenges due to limited transportation, time off from work, and childcare options.<sup>1</sup>

To address these workforce issues, on March 21, 2024, Governor DeSantis approved the "Live Healthy" legislation (SB 7016, SB 7018, SB 330, and SB 1758) to strengthen Florida's health care workforce, increase access to health care services, and incentivize innovation – aspects that are fundamental to establishing a more resilient and patient-focused health care delivery system for Florida residents. Live Healthy received near unanimous bipartisan support from Florida's legislature. Collectively, they took unprecedented action to increase Florida's health care workforce to keep pace with the state's continued rapid population growth and aging population. They created new laws, revised existing laws, and appropriated hundreds of millions of dollars for state agencies to conduct health care workforce expansion objectives.

Live Healthy builds upon existing foundations to improve health care access and quality, which may serve as a national model because of its innovative focus on workforce supply. Specifically, SB 7016 directs the Agency to seek federal approval to use Title XIX matching funds for the workforce training and loan repayment program components of this strategic investment so that all Florida Medicaid beneficiaries will achieve their highest level of health.

<sup>&</sup>lt;sup>1</sup> Health Affairs, Health, Income, & Poverty: Where We Are and What Could Help, October 18, 2018, https://www.healthaffairs.org/do/10.1377/hpb20180817.901935/

# **Goals and Objectives**

The goals of this workforce section 1115 demonstration are to improve Medicaid beneficiary access to services and quality of care by:

- 1. Enhancing the capacity and effectiveness of Florida's health care workforce to meet the evolving needs of the state's diverse population by implementing targeted training and recruitment programs;
- 2. Improving health care access and quality across Florida by strategically addressing workforce shortages and retention challenges through innovative workforce development initiatives supported by federal funding; and,
- 3. Developing a resilient framework for community-based health care workforce initiatives aimed at resolving pediatric home care nursing concerns highlighted by the Department of Justice, particularly for children enrolled in Medicaid with complex medical conditions.

# **Health Care Workforce Challenges**

# **National Challenges**

Access to health care requires a sufficient number and adequate distribution of health care professionals in all parts of the country. The United States (U.S.) is experiencing a health care worker shortage, which is expected to worsen without significant policy interventions.

- In 2020, the Association of American Medical Colleges (AAMC) projected that physician demand will outpace physician supply, leading to a shortage of between 54,100 and 139,000 physicians by 2033, with the most significant gaps in primary care and rural communities.<sup>2</sup>
- In 2024, the AAMC reported physician demand for several medical specialties is continuing to outpace physician supply. The projected physician shortfalls are expected to worsen if investments in graduate medical education (GME) are not increased.<sup>3</sup>
- The Health Resources and Services Administration (HRSA) Bureau of Health Workforce also projected shortages due to aging of the health care workforce. In 2019, approximately half of registered nurses were over 50 years or older, and 44 percent of physicians were 55 years or older.<sup>4</sup>
- HRSA projected that by 2025, 37 states, including Florida, will have a shortage of primary care physicians.<sup>5</sup>

<sup>&</sup>lt;sup>2</sup> The Complexities of Physician Supply and Demand: Projections From 2018 to 2033, American Association of Medical Colleges, 2020, <a href="https://www.aamc.org/news/us-physician-shortage-growing">https://www.aamc.org/news/us-physician-shortage-growing</a>

<sup>&</sup>lt;sup>3</sup> The Complexities of Physician Supply and Demand: Projections From 2021 to 2036, American Association of Medical Colleges, March 2024, <a href="https://www.aamc.org/media/75236/download?attachment">https://www.aamc.org/media/75236/download?attachment</a>

<sup>&</sup>lt;sup>4</sup> U.S. Department of Health and Human Services, Health Resources and Services Administration, National Center for Health Workforce Analysis, "Brief Summary of Results from the 2018 National Sample Survey of Registered Nurses." (2019), <a href="https://data.hrsa.gov/DataDownload/NSSRN/GeneralPUF18/nssrn-summary-report.pdf">https://data.hrsa.gov/DataDownload/NSSRN/GeneralPUF18/nssrn-summary-report.pdf</a>

<sup>&</sup>lt;sup>5</sup> HRSA live data dashboard for "Health Workforce Shortage Areas," <a href="https://data.hrsa.gov/topics/health-workforce/shortage-areas">https://data.hrsa.gov/topics/health-workforce/shortage-areas</a>

- The American Hospital Association reported critical shortages of allied health and behavioral health professionals, especially in historically medically underserved communities.<sup>6</sup>
- Nearly 60 percent of adults with behavioral health disorders report not receiving services for their conditions due to lack of an available provider.<sup>7</sup>
- HRSA projected shortages of psychiatrists and addiction counselors to persist through 2030.8
- HRSA projected a need for an additional 9,902 dental practitioners to meet the needs of the nearly 58 million individuals living in designated U.S health professional shortage areas.<sup>9</sup>

Health care workers are not distributed in proportion to the population or its needs. HRSA reported 8,352 designated primary care Health Professional Shortage Areas (HPSAs) in the U.S., with 66 percent of designated primary care HPSAs being in rural areas. <sup>10</sup> Doctors are reluctant to practice in rural and medically underserved areas due to apprehensions about income, working hours, career development opportunities, and isolation from peers. Doctors graduate from medical school with an average of \$200,000 in debt. <sup>11</sup> This level of debt has some influence on where to practice. However, surveys indicate that young doctors who are commonly of childbearing age are also concerned about educational options for their children, professional opportunities for their spouses, and social opportunities for their young families. Policy measures can influence physicians' practice location choices, such as offering financial incentives to work in underserved areas, educational loan repayments, increasing enrollments of students from underserved areas in medical training programs, decentralizing training locations from urban hospitals to rural clinic settings, and reorganizing service delivery to enhance working conditions in underserved regions.

The COVID-19 pandemic exacerbated these challenges. The U.S. Department of Health and Human Services (DHHS) reported challenges with hospital and outpatient clinician workforce because of COVID-19. The report concludes that "the COVID-19 pandemic has put extreme stress on the health care workforce in the United States, leading to workforce shortages as well as increased health care worker burnout, exhaustion, and trauma. These pandemic-related challenges have taken place in a context of significant preexisting workforce shortages and maldistribution, as well as in a workforce where burnout, stress, and mental health problems (including an ongoing risk of post-traumatic stress disorder) were already significant problems." The report explains that "even after the pandemic, many of the effects the pandemic has had on the health care workforce will likely persist. Addressing these

See Footnote 6

<sup>&</sup>lt;sup>6</sup> American Hospital Association, Fact Sheet: Strengthening the Health Care Workforce, <a href="https://www.aha.org/fact-sheets/2021-05-26-fact-sheet-strengthening-health-care-workforce">https://www.aha.org/fact-sheets/2021-05-26-fact-sheet-strengthening-health-care-workforce</a> (June 2022)

<sup>&</sup>lt;sup>7</sup> See Footnote 6

<sup>&</sup>lt;sup>8</sup> Health Resources & Services Administration, Bureau of Health Workforce, Health Workforce Projections, <a href="https://bhw.hrsa.gov/data-research/projecting-health-workforce-supply-demand">https://bhw.hrsa.gov/data-research/projecting-health-workforce-supply-demand</a>

<sup>&</sup>lt;sup>9</sup> Health Resources & Services Administration, Health Workforce Shortage Areas, May 2024, <a href="https://data.hrsa.gov/topics/health-workforce/shortage-areas">https://data.hrsa.gov/topics/health-workforce/shortage-areas</a>

<sup>&</sup>lt;sup>10</sup> HRSA Health Workforce, State of the Primary Care Workforce, 2023, November 2023, https://bhw.hrsa.gov/sites/default/files/bureau-health-workforce/data-research/state-of-primary-care-workforce-2023.pdf

<sup>&</sup>lt;sup>11</sup> American Medical Association, American Medical Association. Say goodbye to physician residency—and medical student-loan debt? *American Medical Association*. <a href="https://www.ama-assn.org/medical-residents/medical-residency-personal-finance/say-goodbye-physician-residency-and-medical, April 5, 2024.">https://www.ama-assn.org/medical-residents/medical-residency-personal-finance/say-goodbye-physician-residency-and-medical, April 5, 2024.</a>

<sup>&</sup>lt;sup>12</sup> Impact of the COVID-19 Pandemic on the Hospital and Outpatient Clinician Workforce, ASPE Office of Health Policy, May 3, 2022 Issue Brief, <a href="https://aspe.hhs.gov/sites/default/files/documents/9cc72124abd9ea25d58a22c7692dccb6/aspe-covid-workforce-report.pdf">https://aspe.hhs.gov/sites/default/files/documents/9cc72124abd9ea25d58a22c7692dccb6/aspe-covid-workforce-report.pdf</a>

impacts as well as the underlying challenges that pre-dated the pandemic can help build a stronger and more resilient health care system for the future." <sup>13</sup>

Another limitation in meeting the need for health care workers now, and in future, is the availability of training, particularly for nursing. The American Association of Colleges of Nursing reported that in 2020, more than 80,000 qualified applicants were not accepted at nursing schools, reflecting shortages in clinical sites and faculty. This includes nearly 13,000 applicants who were turned away from graduate programs, which could exacerbate shortages in nursing faculty. <sup>14</sup>

Finally, there is a growing trend to deliver health care in non-acute care facilities. However, clinical training for most health care professional students occurs in hospitals. This not only limits the numbers of workers who can be trained, but limits students' exposure to community-based care. In 2023, the National Academies of Sciences, Engineering and Medicine published a landmark consensus study report, "Implementing High-Quality Primary Care," which recommended expanding medical school enrollments in rural and underserved regions and supporting the development of primary care residency programs that train health care practitioners where people live and work, with a particular focus on community-based, primary practice environments. The study also called for funding to support training all members of the interprofessional primary care team, including nurse practitioners, pharmacists, physician assistants, behavioral health specialists, pediatricians, and dental professionals.

# Florida's Distinct Health Care Workforce Challenges

Florida faces many of the same workforce challenges as the U.S. Florida's physician supply is projected to meet only 77 percent of demand by 2035, a shortage of 17,924 full-time equivalent physicians. <sup>15</sup> The Florida Department of Health's 2023 Physician Workforce Annual Report showed that 34 percent (19,396) of physicians are age 60 years or older, and 9.6 percent (5,429) of all physicians who provide direct patient care are planning to retire in the next five years. <sup>16</sup>

Florida is also challenged with geographic distribution of health care professionals. There are high concentrations of doctors in metropolitan cities such as Miami, Orlando, and Tampa. In contrast, rural areas of the Panhandle and Lake Okeechobee areas have low concentrations of doctors. Among all physicians working in Florida, 98 percent work in urban counties while only 2 percent work in rural counties.<sup>17</sup>

Of Florida's 67 counties, 24 counties (36 percent) have a per capita rate of 10 or fewer physicians per 10,000 population. A prior report showed that areas with physician to population ratios below 1:3500

<sup>&</sup>lt;sup>13</sup> Impact of the COVID-19 Pandemic on the Hospital and Outpatient Clinician Workforce, ASPE Office of Health Policy, May 3, 2022 Issue Brief, <a href="https://aspe.hhs.gov/sites/default/files/documents/9cc72124abd9ea25d58a22c7692dccb6/aspe-covid-workforce-report.pdf">https://aspe.hhs.gov/sites/default/files/documents/9cc72124abd9ea25d58a22c7692dccb6/aspe-covid-workforce-report.pdf</a>

<sup>&</sup>lt;sup>14</sup> American Association of Colleges of Nursing (AACN), <a href="https://www.aacnnursing.org/news-data/fact-sheets/nursing-faculty-shortage">https://www.aacnnursing.org/News-Information/Press-Releases/View/ArticleId/24802/2020-survey-data-student-enrollment</a>

<sup>&</sup>lt;sup>15</sup> Iacobucci, Will, et al. "Florida Statewide and Regional Physician Workforce Analysis: 2019 to 2035." (2021)

<sup>&</sup>lt;sup>16</sup> 2023 Florida Physician Workforce Annual Report, November 1, 2023, <a href="https://www.floridahealth.gov/provider-and-partner-resources/community-health-workers/HealthResourcesandAccess/physician-workforce-development-and-recruitment/2023DOHPhysicianWorkforceAnnualReport-FINAL1.pdf">https://www.floridahealth.gov/provider-and-partner-resources/community-health-workers/HealthResourcesandAccess/physician-workforce-development-and-recruitment/2023DOHPhysicianWorkforceAnnualReport-FINAL1.pdf</a>.

<sup>&</sup>lt;sup>17</sup>2023 Florida Physician Workforce Annual Report, see footnote 16.

<sup>&</sup>lt;sup>18</sup>2023 Florida Physician Workforce Annual Report, see footnote 16.

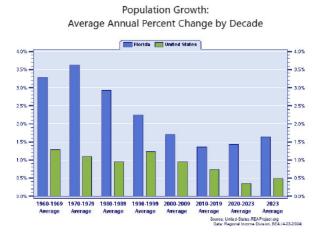
were associated with a one year loss of life compared to areas where the ratio was above 1:3500...<sup>19</sup> Florida's critical workforce shortage designations as identified by HRSA are listed below:

Florida Health Professional Shortage Areas.<sup>20</sup> as of March 31, 2024.<sup>21</sup>

.Provider Type	Total HPSA Designations	Population of Designated HPSAs	Percent of Need Met	Practitioners Needed to Remove Designation
Primary Care Providers	277	5,979,660	37%	1,295
Dental Providers	263	5,519,905	19%	1,173
Mental Health Providers	212	7,812,746	24%	446

Florida has also been cited by the Department of Justice as having specific issues related to home care of children with complex medical needs. The Agency is tasked via an injunction with transitioning children in nursing facilities to a home or community-based setting and to incrementally increase the percentage of in-home nursing hours provided for children until 100 percent of authorized hours are staffed. Thus, Florida Medicaid has a priority need for nurses with training in home and community-based pediatric care.

In addition to these workforce challenges, Florida has the unique stressors of rapid population growth and high percentage of older residents. Florida is the third most populous state in the nation, with over 22.6 million residents.<sup>22</sup> and was the second-fastest growing state in 2022-2023..<sup>23</sup> The U.S. Census Bureau projects that Florida's population will continue to grow at a more accelerated rate than the national population. National population growth trends are projected to average 0.3 percent per year compared to Florida's average growth rate of 1.4 percent..<sup>24</sup> This graphic compares the national annual percent population change by decade. Relative to national trends, Florida has



This chart compares the decade average growth rates for Florida to the United States

historically outpaced national population growth rates over the decades. Between 2020-2023, Florida

 <sup>&</sup>lt;sup>19</sup> Basu S, Phillips RS, Berkowitz SA, et al. Estimated Effect on Life Expectancy of Alleviating Primary Care Shortages in the United States. Annals of Internal Medicine. 2021 Jul; 174(7):920-926. DOI: 10.7326/m20-7381. PMID: 33750188.
 <sup>20</sup> HRSA identifies HPSAs to identify areas and population groups in the U.S. that are experiencing a shortage of health

professionals. To be an HPSA, an area must have a population-to-provider ratio of a certain threshold. For example, for dental care, the population to provider ratio must be at least 5,000 to 1 (4,000 to 1 if there are unusually high needs in the community). Data available at <a href="https://data.hrsa.gov/topics/health-workforce/shortage-areas">https://data.hrsa.gov/topics/health-workforce/shortage-areas</a>.

<sup>&</sup>lt;sup>21</sup> HRSA live data dashboard for "Health Workforce Shortage Areas," <a href="https://data.hrsa.gov/topics/health-workforce/shortage-areas">https://data.hrsa.gov/topics/health-workforce/shortage-areas</a>

 $<sup>{}^{22}\</sup>text{ U.S. Census Bureau} - \underline{\text{https://www.census.gov/newsroom/press-releases/2023/population-trends-return-to-pre-pandemic-norms.html}$ 

<sup>&</sup>lt;sup>23</sup> U.S. Census Bureau, see footnote 22.

<sup>&</sup>lt;sup>24</sup> U.S. Census Bureau, "New Florida Estimates Show Nation's Third-Largest State Reaching Historic Milestone", <a href="https://www.census.gov/library/stories/2022/12/florida-fastest-growing-state.html#:~:text=Between%202010%20and%202020%2C%20national,the%20fastest%20among%20the%20states</a>

population grew by 1.44% annually, well over the U.S. annual population growth rate of 0.35% for the same time period.<sup>25</sup>

With a rapidly growing population, there is a need for a corresponding increase in health care services, and this is especially true for older adults, who use more health care services. Adults ages 65 years or older (65+) account for approximately 12 percent of the U.S. population, but account for approximately 26 percent of all physician office visits, 35 percent of all hospital stays, and 34 percent of all prescriptions. Florida is the state with the highest percentage of residents aged 65+. The 65+ age group was also the fastest growing age group in Florida between 2010 and 2022, increasing 46 percent. In addition, individuals age 50+ are attracted to Florida at a rate of 300,000 new residents per year, which means that the older population will continue to increase at a rapid rate and need more health care services in the near future. In the services in the near future.

# **Workforce Solutions**

# **Federal Solutions**

The federal government has recognized these workforce challenges and has significantly increased efforts to provide funding to build a well-trained, high-quality health workforce that reflects the health care needs of their communities of practice. These efforts acknowledge that historic investments in the health workforce are needed to serve U.S. health needs. The DHHS Health Workforce Strategic Plan 2021 provided a framework for health care workforce improvements across all federal agencies centered around key goals:

- 1) Expanding the health workforce supply to meet evolving community needs;
- 2) Improving workforce in underserved and rural communities;
- 3) Improving health care quality through professional development; and,
- 4) Enhancing the use of data and evidence to understand opportunities to strengthen the nation's health workforce.

DHHS's "Health Workforce Initiative" aims to support, strengthen, and increase the health care workforce, including physicians, nurses, dentists, behavioral health care providers, community health workers, and peer support specialists. <sup>30</sup> The initiative leverages programs across DHHS, including

<sup>&</sup>lt;sup>25</sup> Florida vs. United States Comparative Trends Report: Population, 1958-2023 Regional Income and Product, Divisions of the Bureau of Economic Analysis, U.S. Department of Commerce, <a href="https://united-states.reaproject.org/analysis/comparative-trends-analysis/population/reports/120000/0/#page">https://united-states.reaproject.org/analysis/comparative-trends-analysis/population/reports/120000/0/#page</a> 2

<sup>&</sup>lt;sup>26</sup> Institute of Medicine (US) Committee on the Future Health Care Workforce for Older Americans. Retooling for an Aging America: Building the Health Care Workforce. Washington (DC): National Academies Press (US); 2008. 2, Health Status and Health Care Service Utilization, <a href="https://www.ncbi.nlm.nih.gov/books/NBK215400/">https://www.ncbi.nlm.nih.gov/books/NBK215400/</a>

<sup>&</sup>lt;sup>27</sup> U.S. Census Bureau, see Footnote 22.

<sup>&</sup>lt;sup>28</sup> USA FACTS, Florida population data - <a href="https://usafacts.org/data/topics/people-society/population-and-demographics/our-changing-population/state/florida/">https://usafacts.org/data/topics/people-society/population-and-demographics/our-changing-population/state/florida/</a>

<sup>&</sup>lt;sup>29</sup> In 2022, the 60 to 69-year-old age group represented the largest share of people moving to Florida from other states per the U.S. Census Bureau's American Community Survey. The second-largest age group moving to Florida was people ages 50 to 59. See <a href="https://www.cbsnews.com/miami/news/expert-its-the-highest-number-its-ever-been-as-florida-population-growth-continues/">https://www.cbsnews.com/miami/news/expert-its-the-highest-number-its-ever-been-as-florida-population-growth-continues/</a>.

<sup>&</sup>lt;sup>30</sup> New HHS Initiative Aims to Strengthen Nation's Health Workforce, July 6, 2023, https://www.hhs.gov/about/news/2023/07/06/new-hhs-initiative-aims-strengthen-nations-health-workforce.html

through a \$2.7 billion workforce investment for HRSA.<sup>31</sup> HRSA administers numerous programs focused on growing and supporting the health care workforce, with a particular focus on meeting the health care needs of underserved and rural communities. HRSA's leading health care workforce programs – the *National Health Service Corps* and the *Teaching Health Center Graduate Medical Education Program* – are prioritized for funding to support the recruitment and development of clinicians to deliver community-based care through loan repayment, scholarships, and residency training.<sup>32</sup> HRSA's budget also prioritizes investments in increasing the nursing and behavioral health care workforce and supporting innovative programs to foster new approaches in workforce development and training.

HRSA identified clinical training as a vital component for virtually all health care professionals that serves as a bridge between learning in the classroom and successful clinical practice in the community. HRSA determined that hospital-based GME does not evenly address the needs of all Americans and leaves rural areas in a state of persistent shortage. <sup>33</sup> Place-based training initiatives that provide more residency training positions in rural hospitals and community health facilities have produced graduates who remain in those areas, and studies show that many students will choose to practice in settings near where they completed their clinical/residency training. <sup>34</sup> This is also in line with the recommendations of experts who advocate for more community-based training. <sup>35</sup> In response, HRSA recommended expanding and extending successful place-based training initiatives that promote access to care and expanding clinical training outside of teaching hospitals to include more rural, remote, or other locations that are difficult to access, exposing students to the unique needs of populations living in these areas. <sup>36</sup>

HRSA's key ongoing activities to address these workforce issues include:

- Increased funding to organizations to train and expand access to behavioral health professionals and to increase health professions' scholarship and loan repayment award amounts by 27 percent.
- Nurse Faculty Loan Program: assists graduate students pursing faculty careers. Students must agree to teach at a school of nursing in exchange for cancellation of up to 85 percent of their educational loans, plus interest, over a four-year period.
- National Health Service Corps Program: supports primary care medical, dental, and behavioral health providers through scholarships and loan repayment programs with a focus on supporting qualified health care providers dedicated to working in areas with limited access to care.
- Teaching Health Center Graduate Medical Education Program: trains physician and dental residents in outpatient settings in the community (versus hospital settings), such as community health centers, with a focus on rural and underserved communities. <sup>37</sup>

<sup>&</sup>lt;sup>31</sup> New HHS Initiative Aims to Strengthen Nation's Health Workforce, see Footnote 30.

<sup>&</sup>lt;sup>32</sup> New HHS Initiative Aims to Strengthen Nation's Health Workforce, see Footnote 30.

<sup>&</sup>lt;sup>33</sup>Investing in a Health Workforce that Meets Rural Needs, HRSA Council on Graduate Medical Education (COGME), Issue Brief #2: Rural Health, February 2021, <a href="https://www.hrsa.gov/sites/default/files/hrsa/advisory-committees/graduate-medical-edu/publications/cogme-rural-health-issue-brief.pdf">https://www.hrsa.gov/sites/default/files/hrsa/advisory-committees/graduate-medical-edu/publications/cogme-rural-health-issue-brief.pdf</a>

<sup>&</sup>lt;sup>34</sup> Florida Statewide and Regional Physician Workforce Analysis: 2019 to 2035 (2021), see Footnote 15.

<sup>&</sup>lt;sup>35</sup> National Academy of Sciences, Engineering, and Medicine, Implementing High-Quality Primary Care: Rebuilding the Foundation of Health Care, 2021 <a href="https://www.nationalacademies.org/our-work/implementing-high-quality-primary-care">https://www.nationalacademies.org/our-work/implementing-high-quality-primary-care</a>

<sup>&</sup>lt;sup>36</sup> Enhancing Community-Based Clinical Training Sites: Challenges and Opportunities, HRSA Advisory Committee on Interdisciplinary, Community-Based Linkages (ACICBL), January 2018,

https://www.hrsa.gov/sites/default/files/hrsa/advisory-committees/community-based-linkages/reports/sixteenth-2018.pdf <sup>37</sup> HRSA 2021 Health Workforce Highlights, <a href="https://www.hrsa.gov/sites/default/files/hrsa/about/hrsa-health-workforce-fact-sheet.pdf">https://www.hrsa.gov/sites/default/files/hrsa/about/hrsa-health-workforce-fact-sheet.pdf</a>

The DHHS Health Workforce Strategic Plan and Health Workforce Initiative reflects a coordinated and intentional effort to proactively address long-standing barriers to strengthening the health workforce to appropriately respond to the increasing health needs driven by a rising and aging national population — much like Florida's Live Healthy comprehensive legislation intends to grow Florida's health care workforce.

# Florida Solutions

Florida has developed proactive approaches to address state health care workforce challenges. In 2005, Florida was recognized by the National Center on Education and the Economy as highly innovative in workforce development with state legislation and leadership being credited as the catalysts in addressing workforce issues. <sup>38</sup> Over the years, Florida has been at the forefront of implementing activities to build and sustain its health care workforce by establishing a state agency to lead workforce development, operating 24 regionally-focused workforce boards to better target the needs of the community, implementing multiple state-level work councils and employment training programs, and maintaining a statewide strategic plan with immediate and long-term approaches that include building connections with Florida's community college system as a bridge to new workforce. <sup>39</sup>

The Agency's public health care workforce efforts expanded in 2006 to incorporate federal Medicaid funds approved under section 1115 demonstration authority for the Low Income Pool (LIP) that, in part, permits the state to build and sustain Medicaid workforce by providing supplemental funding to cover uncompensated care in hospitals, federally qualified health centers and rural health clinics, medical school faculty physician practices, and community behavioral health providers. Eligibility requirements vary across provider types, but at a minimum, the provider must participate in Medicaid. LIP provides over \$1 billion annually to support the health care workforce that is serving low-income beneficiaries.

In 2013, the Agency broadened workforce-sustaining efforts focused on Medicaid by implementing a statewide GME program to improve the quality of care and access to care for Medicaid recipients, expand the availability of GME, and increase the supply of highly-trained physicians statewide. Today, Florida operates a comprehensive statewide GME program comprised of eight programs that together provide over \$430 million annually in a multi-pronged approach to solving challenges that impact sustaining workforce. <sup>40</sup> Some of Florida's key GME programs are described in this table:

<sup>&</sup>lt;sup>38</sup> "Workforce Development in the State of Florida: An Overview, 2005", National Center on Education and the Economy, Pat Fahy, 2006, <a href="https://ncee.org/wp-content/uploads/2011/08/Florida">https://ncee.org/wp-content/uploads/2011/08/Florida</a> Case Study.pdf

<sup>&</sup>lt;sup>39</sup> "Florida's University Graduates Tend to Stay in the State Workforce After Completing Their Degrees" (2005), https://oppaga.fl.gov/Documents/Reports/05-59.pdf.

<sup>&</sup>lt;sup>40</sup> AHCA House Health Care Appropriations, February 15, 2021,

https://ahca.myflorida.com/content/download/5868/file/House Health Care Appropriations Medicaid Presentation Supplemental Payments 20210215.pdf and Florida Medicaid: Graduate Medical Education Overview, November 14, 2023, https://ahca.myflorida.com/content/download/23696/file/Graduate%20Medical%20Education%20Program%20Overview% 20Final .pdf

Graduate Medical	GME Program Description
Education (GME)	
Program	
Statewide Medicaid	Provides funding to qualified participating hospitals involved in
Residency Program	graduate medical education to improve access to care for Medicaid
	recipients and increase the supply of highly-trained physicians
	statewide.
Startup Bonus	Provides funding to hospitals with newly accredited physician residency
Program	programs or positions in the statewide supply-and-demand deficit
	specialties or subspecialties.
<b>Slots for Doctors</b>	Provides funding to address the physician workforce shortage by
Program	increasing the supply of highly-trained physicians through the creation
	of new resident positions, which will increase access to care and
	improve health outcomes for Medicaid recipients.
High Tertiary	Provides funds to teaching hospitals offering highly specialized tertiary
Program	care, including comprehensive stroke and Level 2 adult cardiovascular
	services; NICU II and III; and adult open heart; with more than 30 FTE
	residents over the Medicare cap in accordance with the CMS-2552.
Severe Deficit	Provides funding to address declining GME in severe deficit physician
Program	specialties. The program funds up to \$100,000 per FTE to residency
	positions in urology, thoracic surgery, nephrology, and ophthalmology.
Primary Care	Provides funding up to \$150,000 per full time resident in primary care
Program	and training in Medicaid regions with primary care demand greater than
	supply by 25 percent or more.
Mental/Behavioral	Distributes funding for residents, fellows or interns who rotate through
Health Program	mental health and behavioral health facilities to address the severe
	deficit of physicians trained in these areas.

In 2021, the Agency sought and received federal support for an Indirect Medical Education (IME) program to support hospitals with physician residents. The IME program provides over \$705 million annually to cover the costs associated with residency training programs that are known to incur higher patient care costs relative to non-teaching hospitals.

Since 2022, to address the nursing shortage in the state, Governor DeSantis has approved over \$300 million in state funding to nursing education programs in Florida's college system, school districts, and technical career centers through the Linking Industry to Nursing Education (LINE) Fund and the Programs, Employers, and Learners through Incentives for Nursing Education (PIPELINE) grant opportunity. The programs are designed to increase access to high quality nursing education.

The Live Healthy legislation is the next evolution of the state's strategic efforts to ensure sufficient number of health professionals who will ensure the effectiveness, efficiency, and quality of care of Florida's health system. The Live Healthy workforce programs align with the goals of the DHHS Health Workforce Strategic Plan and federal programs that strengthen the health care workforce and connect skilled health care providers to underserved communities. The Live Healthy workforce programs implemented under the demonstration will support locally licensed health care professionals and students through new funding for training, certification, and loan repayment. These programs will increase resources for training health care practitioners in community settings by helping health clinics

establish, expand, and sustain a health workforce that will evolve with the needs of Florida's increasing and aging population, specifically with focus on rural and medically underserved communities. The Live Healthy workforce initiatives are expected to increase access and incentivize innovation for a stronger health care workforce, and with CMS approval, will support Florida in carrying out a strategy to mitigate the impact of a national health care workforce shortage and other practice challenges.

# Program Eligibility, Benefits, Health Care Delivery System, and Cost-Sharing

The demonstration will authorize federal medical assistance percentage for the state to operate new programs focused on provider certification, training, and student loan repayment. The goal of these programs is to build Florida's health care workforce to keep pace with the expected medical demand of the state's growing and aging population. The demonstration is not intended to enroll individuals into Medicaid as beneficiaries or providers but rather to expand federal support to implement provider workforce training programs that will support people who enroll in Medicaid through existing program authorities. The demonstration benefits are the training certification, reimbursement, and loan repayment programs described below for eligible qualified providers and facilities. There will be no cost-sharing imposed for workforce training offered under the demonstration.

Florida Medicaid utilizes a mandatory managed care delivery system for enrolling eligible beneficiaries, except those specifically exempted due to short-term eligibility, limited-service eligibility, or institutional placement other than nursing home care. As this demonstration is not providing direct care to Medicaid beneficiaries, it is not expected to impact program eligibility, enrollment, or the delivery of medical services to beneficiaries.

# **WORKFORCE PROGRAMS**

# A. Training, Education, and Clinicals in Health (TEACH) Funding Program

The TEACH Funding Program will provide a high-quality educational experience while supporting participating federally qualified health centers, community mental health centers, rural health clinics, and certified community behavioral health clinics by offsetting administrative costs and loss of revenue associated with training residents and students to become licensed health care practitioners. The legislative intent for TEACH is to support the Medicaid program and underserved populations by expanding the available health care workforce. Key elements include:

- Funding support: Offsets the administrative costs and loss of revenue associated with establishing, maintaining, or expanding a clinical training program for the types of students detailed below. Reimbursement will be based on the number of clinical training hours reported quarterly. The Agency will reimburse qualified facilities a per student hourly rate by student type as designated in the law. A qualified facility may not be reimbursed more than \$75,000 per fiscal year; however, if it operates a residency program, it may be reimbursed up to \$100,000 each fiscal year.
- Eligible qualified facilities: Federally qualified health centers (FQHC), community mental health centers, rural health clinics, or certified community behavioral health clinics.
- Training and technical support for preceptors: Preceptors are Florida-licensed health care practitioners who direct, teach, supervise, and evaluate the learning experience of a resident or

student during a clinical rotation. The Agency will develop training for preceptors and provide technical support for preceptors.

Upon the Agency's approval of the application, the qualified facility must enter into a contractual agreement that will require it to do all of the following:

- 1. Agree to provide appropriate supervision or precepting for one or more of the following categories of residents or students:
  - Allopathic or osteopathic residents pursuing a primary care specialty.
    - Qualified primary care specialties: general internal medicine, family medicine, obstetrics and gynecology, general pediatrics, psychiatry, geriatric medicine, or any other specialty identified by the state as primary care
  - Dental residents
  - Advanced practice registered nursing students pursuing a primary care specialty
  - Nursing students
  - Allopathic or osteopathic medical students
  - Dental students
  - Dental hygiene students
  - Physician assistant students
  - Behavioral health students, including students studying psychology, clinical social work, marriage and family therapy, or mental health counseling
- 2. Meet and maintain all requirements to operate an accredited residency program if the qualified facility operates a residency program.
- 3. Obtain and maintain accreditation from an accreditation body approved by the Agency if the qualified facility provides clinical rotations.
- 4. Ensure that clinical preceptors meet agency standards for precepting students, including the completion of any training required by the Agency.
- 5. Submit quarterly reports to the Agency that minimally include:
  - Type of residency or clinical rotation offered
  - Number of residents or students participating in each type of clinical rotation or residency
  - Number of hours worked by each resident or student each month
  - Evaluations by the residents and student participants of the clinical experience on an evaluation form designated by the Agency
  - Itemized list of administrative costs associated with the operation of the clinical training program, including accreditation costs and other costs relating to the creation, implementation, and maintenance of the program
  - Calculation of lost revenue associated with operating the clinical training program
- 6. A qualified facility must furnish data and information requested by the Agency to support reporting and evaluation including, but not limited to, the program's effectiveness in:

- Enabling qualified facilities to provide clinical rotations and residency opportunities to students and medical school graduates, as applicable
- Enabling the recruitment and retention of health care professionals in geographic and practice areas experiencing shortages

# B. Florida Reimbursement Assistance for Medical Education (FRAME) Program

The FRAME program supports the state Medicaid program by promoting access to qualified medical professionals by encouraging practice in underserved locations where there are shortages of such personnel. The program will make payments that offset loans and educational expenses incurred by students for studies leading to a medical or nursing degree, medical or nursing licensure, or advanced practice registered nurse licensure or physician assistant licensure. The following licensed or certified health care practitioners professionals are eligible to participate in the FRAME program:

- Medical doctors with primary care specialties: obstetrics, gynecology, general and family practice, geriatrics, internal medicine, pediatrics, psychiatry, osteopathic medicine, and other specialties which may be identified by the Department of Health (DOH)
- Advanced practice registered nurses registered to engage in autonomous practice in accordance with Florida law
- Advanced practice registered nurses
- Physician assistants
- Mental health professionals, including licensed clinical social workers, licensed marriage and family therapists, licensed mental health counselors, and licensed psychologists
- Licensed practical nurses and registered nurses

FRAME funds will be awarded over a four-year period of continued proof of practice in a rural or underserved area as designated by DOH:

- Up to \$150,000 for physicians
- Up to \$90,000 for advanced practice registered nurses registered to engage in autonomous practice and practicing autonomously
- Up to \$75,000 for advanced practice registered nurses and physician assistants
- Up to \$75,000 for mental health professionals
- Up to \$45,000 for licensed practical nurses and registered nurses

Educational expenses include costs for tuition, matriculation, registration, books, laboratory and other fees, other educational costs, and reasonable living expenses as determined by DOH. Each practitioner is eligible to receive an award for only one four-year period of continued proof of practice; however, the four years of practice are not required to be consecutive. At the end of each year that a practitioner participates in the FRAME program, DOH will issue a loan repayment award that equals 25 percent of a practitioner's principal loan amount at the time he or she applied for the program up to the maximum dollar award.

All FRAME payments are contingent on continued proof of:

- 1. Primary care practice in a rural hospital or an underserved area designated by DOH, provided the practitioner accepts Medicaid reimbursement if eligible for such reimbursement.
- 2. For practitioners other than physicians, practicing in other settings, including but not limited to, a nursing home facility, a home health agency, or an intermediate care facility for the developmentally disabled any such setting must be located in, or serve residents or patients in, an underserved area designated by DOH, and must provide services to Medicaid patients.
  - Locations with high incidences of infant mortality, high morbidity, or low Medicaid participation by health care professionals may be designated by DOH as underserved.
- 3. Providing 25 hours annually of volunteer primary care services in a free clinic or through another volunteer program operated by the state. Volunteer hours must be verifiable in a manner determined by DOH.

# C. The Dental Student Loan Repayment Program

The Dental Student Loan Repayment Program supports the Florida Medicaid program by promoting access to dental care by supporting qualified dentists and dental hygienists who treat medically underserved populations in dental health professional shortage areas or medically underserved areas. The program will benefit Florida-licensed dentists and dental hygienists who:

- 1. Demonstrate active employment in a public health program or private practice that serves Medicaid recipients and other low-income patients and is located in a dental health professional shortage area or a medically underserved area; and,
- 2. Volunteer 25 hours per year providing dental services in a free clinic that is located in a dental health professional shortage area or a medically underserved area, through another volunteer program operated by the state, or through a pro bono program approved by the Florida Board of Dentistry. In order to meet the requirements, the volunteer hours must be verifiable in a manner determined by DOH.

The program will equal 20 percent of a dentist's or dental hygienist's principal loan amount at the time he or she applied for the program but may not exceed \$50,000 per year, per eligible dentist or \$7,500 per year, per eligible dental hygienist. Loan repayment awards can only be used to pay the costs of tuition, books, dental equipment and supplies, uniforms, and living expenses.

A dentist or dental hygienist may receive up to a maximum of five awards for each year he or she maintains eligibility for the program for the entire year. Loan repayment awards are not required to be awarded in consecutive years and, if a dentist or dental hygienist loses eligibility for the current year, he or she may reapply for the program in a future year once he or she has regained eligibility. A practitioner is not eligible to receive funds under the program if the dentist or dental hygienist:

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<sup>&</sup>lt;sup>41</sup> Medically underserved area means a geographic area, an area having a special population, or a facility which is designated a health professional shortage area, and which has a shortage of dental health professionals who serve Medicaid recipients and other low-income patients.

- 1. Is no longer employed by a public health program or private practice that meets legal requirements or does not verify that he or she has volunteered his or her dental services for the required number of hours.
- 2. Ceases to participate in the Florida Medicaid program.
- 3. Has disciplinary action taken against his or her license by the Board of Dentistry for a violation of statute.

# D. Nursing Indirect Medical Education (IME) Program

Florida's Funding Initiative for the Recruitment, Sustainment and Training of Nursing (FIRST) IME is a nursing workforce expansion and education program. The Agency will make semi-annual payments to eligible public teaching hospitals to address the nursing shortage in Florida. Florida FIRST implements federal recommendations to support the recruitment, training, and retention of nursing staff in public teaching hospitals that provide care to a higher percentage Medicaid beneficiaries compared to other facilities.

**Eligible Hospitals:** An eligible hospital is a public hospital with residents in approved Accreditation Council for Graduate Medical Education training programs as of January 1, 2023.

**Payment Calculation:** On or before October 1 of each year, the Agency will calculate the Florida FIRST IME payment pool based on each hospital's ratio of nursing full-time equivalents to beds and Medicaid inpatient payments. Semi-annual IME payments will be calculated using the most recently filed and available Medicare Cost Report (CMS Form 2552) extracted from the Healthcare Cost Report Information System and the Florida Hospital Uniform Reporting System (FHURS).

**Payments:** One half of the annual computed IME payment will be paid to eligible teaching hospitals on a semi-annual basis. The semi-annual payments are considered final and will not be reconciled or amended due to updated or amended Medicare Cost Reports or FHURS reports. Payments to participating hospitals are contingent on the nonfederal share being provided through intergovernmental transfers.

**Reporting:** Hospitals participating in Florida FIRST will provide quarterly reports to the Agency detailing the number of nurses being trained in each participating hospital.

# **Potential Program Impact**

This section estimates the ranges of newly qualified practitioners and/or teaching facilities that will be eligible to receive awards over the initial five-year demonstration period. Actual participation in the programs may vary.

For TEACH, the estimated number of participating facilities varies depending on whether the facility operates a residency program.

• TEACH – 633 – 844 qualified health facilities will be eligible to receive awards each year of the demonstration period.

For FRAME and the Dental Student Loan Repayment Program, the estimates assume full participation up to the total appropriated amount for each workforce program. The variance in numbers in each program reflects the differences in the loan reimbursement amount available to different practitioner types. These estimates potentially underestimate the number of participants, as some practitioners may not qualify for the maximum reimbursement in a year or qualify for all years of reimbursement.

- FRAME 2887 9591 licensed or certified health care practitioners professionals, depending on practice area, will be eligible to receive awards each year of the demonstration period.
- Dental Student Loan Repayment Program 459 3065 qualified dentists and dental hygienists will be eligible to receive awards each year of the demonstration period.

For FIRST IME, for which the state share will be funded by intergovernmental transfers, the estimated number of participating hospitals is based on the count of public hospitals that received physician IME funding.

 Approximately 13 qualified public hospitals with residency training programs will be eligible to receive awards each year of the demonstration period.

The TEACH, FRAME, Dental Student Loan Repayment Program, and FIRST IME workforce programs are otherwise not expected to impact program eligibility or enrollment.

# **Total Costs and Budget Neutrality**

Because this is a new section 1115 demonstration based on the recently enacted Live Healthy Act with an associated state budget appropriation, there is no relevant title XIX program expenditure history to report. In alignment with previously approved CMS funding models for similar medical education certification and repayment programs, the Agency proposes a "hypothetical" budget neutrality model for this workforce demonstration.

In accordance with CMS' policy, when expenditure authority is provided for coverage of populations or services that the state could have otherwise provided through its Medicaid state plan or other title XIX authority (such as a waiver under section 1915 of the Social Security Act), or when a "without waiver" (WOW) spending baseline for certain "with waiver" (WW) expenditures is difficult to estimate due to variable or limited cost data resulting in anomalous trend rates, CMS considers these expenditures to be "hypothetical," such that the expenditures are treated as if the state could have received federal financial participation (FFP) for these costs absent the demonstration. The Live Healthy expenditures align with this description for applicability of hypothetical treatment. As a hypothetical population, the estimated WOW and WW total expenditures (state and federal share) for each demonstration year are listed below.

**Projected (Title XIX) Medicaid Expenditures by Demonstration Year (DY)** (Dollar amounts of estimated total expenditures inclusive of state and federal share.)

Workforce Program	DY01	DY02	DY03	DY04	DY05
Training, Education, and Clinicals in Health (TEACH)	\$63,335,679	\$61,629,765	\$60,416,200	\$59,787,422	\$59,668,508

Workforce Program	DY01	DY02	DY03	DY04	DY05
Funding Program					
FRAME Medical Student Loan Repayment Program	\$107,905,231	\$104,998,859	\$102,931,305	\$101,860,053	\$101,657,459
Dental Student Loan Repayment Program	\$23,457,659	\$22,825,839	\$22,376,371	\$22,143,490	\$22,099,448
Nursing IME	\$446,538,686	\$434,511,395	\$425,955,341	\$421,522,236	\$420,683,850
PROGRAMS TOTAL:	\$641,237,255	\$623,965,857	\$611,679,217	\$605,313,202	\$604,109,264

# **Evaluation Parameters**

The Agency, in consultation with a to-be-selected evaluator, will identify validated performance measures that will assess the impact of the demonstration on the state's health care workforce. In addition, the Agency intends to work with the selected evaluator to identify meaningful comparison groups in designing the evaluation plan. The Agency intends to follow all CMS evaluation design guidance in working with the evaluator to draft an evaluation plan. It is notable that in the five-year period of the demonstration, results in the form of providers completing their education/training program or required service component of the loan repayment programs may be limited. The proposed evaluation parameters are listed in the table below.

**Proposed Evaluation Parameters** 

Proposed Hypothesis	Anticipated Measure(s)	Proposed Data Sources
The TEACH program will increase the number federally qualified health centers, community mental health centers, certified community behavioral health clinics, and rural health clinics offering clinical training and/or increase the overall numbers of training slots for the targeted practitioners.	Number of federally qualified health centers, community mental health centers, certified community behavioral health clinics, and rural health clinics offering clinical training.  Number of training slots offered by federally qualified health centers, community mental health centers, certified community behavioral health clinics, and rural health clinics.	Agency for Health Care Administration Live Healthy program reports
The FRAME program and the Dental Student Loan	Number of practitioners receiving loan repayment who	Agency for Health Care Administration

Proposed Hypothesis	Anticipated Measure(s)	Proposed Data Sources
Repayment Program will increase the recruitment and retention of health care	initiate their service commitment.	Live Healthy program reports
professionals in Florida's medically underserved areas.	Length of service in underserved areas by practitioners receiving loan repayment.	Department of Health licensure data
The number of nurses in clinical training will increase.	Number of nurse trainees in TEACH and nursing IME.	Agency for Health Care Administration Florida Center for Nursing
The number of mental health therapists in clinical training will increase.	Number of social work, mental health counseling, marriage and family therapy, and psychology students in TEACH.	Agency for Health Care Administration Live Healthy program reports

# Waiver and Expenditure Authorities

- Section 1115(a)(1) Waiver Authorities. The Agency is not expected to need any waivers of section 1902 of the Social Security Act to implement the demonstration as proposed.
- Section 1115(a)(2) Expenditure Authorities. The Agency is requesting section 1115(a)(2) expenditure authority under Title XIX for federal assistance matching percentage to implement the workforce programs as proposed therein.

# **Public Notice and Public Comment Process**

In accordance with federal public notice requirements listed at 42 CFR 431.408, Florida completed its state public notice and comment period as follows:

Florida published an abbreviated public notice on the Agency for Health Care Administration's website, AHCA.myflorida.com, on December 11, 2024. Notice for tribal consultation was sent on December 11, 2024, to both the Miccosukee and the Seminole Tribes of Florida. As outlined in these public notices, the Agency provided a 45-day public comment period from December 11, 2024, through January 24, 2025. The draft section 1115 demonstration application and related public notice materials were posted for the 45-day public comment period starting December 11, 2024 on the Agency's Medicaid Federal Authorities home page: <a href="https://ahca.myflorida.com/medicaid/medicaid-policy-quality-and-operations/medicaid-policy-and-quality/medicaid-policy/federal-authorities/federal-waivers">https://ahca.myflorida.com/medicaid/medicaid-policy-quality-and-operations/medicaid-policy-and-quality/medicaid-policy/federal-authorities/federal-waivers</a>.

Florida held two in-person hearings in geographically distinct areas of the State, the first in Tallahassee and the second in Orlando. The public hearings were held as follows:

- Public Hearing 1 was held in Tallahassee, Florida on January 8<sup>th</sup>, 1:30-3:30pm during the Medical Care Advisory Committee (MCAC) meeting. The meeting was held at the Agency for Health Care Administration located at 2727 Mahan Drive, Tallahassee, FL 32308.
- **Public Hearing 2** was held in Orlando, Florida on January 10th, 10:00-12:00pm at the Orlando Hurston Complex located at 400 W Robinson Street, North Tower N109, Orlando, FL 32801.

The comments shared at these public hearings are summarized under the Public Comment Summary Report section immediately following.

# **Public Comment Summary Report**

Florida received comments from 16 commenters representing various health provider and hospital organizations (e.g., Florida Health Association (FHA), Florida Behavioral Health Association (FBHA), Safety Net Hospital Alliance (SNHAF), etc.). All commenters supported the overall demonstration proposal with several commenters suggesting changes to expand the scope of eligible hospitals. The Agency carefully considered all public comments received on the proposed demonstration and a summary of the public comments is included below in the "report of issues" as required by 431.412(a)(1)(viii).

Summary of Comments Florida Health Care Workforce Sustainability Section 1115 Demonstration				
Total Number of Comments 16				
Theme	Count			
Theme 1: Overall support for the demonstration	16			
Theme 2: Request language modification to expand eligibility in the FIRST program	6 of 16			
Theme 3: Request changes to the accreditation entities for eligibility	4 of 16			

Summary of Comments					
Florida Health Care Workforce Sustainability Section 1115 Demonstration					
Theme 4: Request language modification to expand eligibility in the TEACH program	1 of 16				

# **Summary Overview of Public Comments:**

# Theme 1: Overall support for the demonstration

All commenters expressed overwhelming support for the demonstration. All commenters noted the importance of the Live Healthy section 1115 demonstration and praises the FIRST program for closing workforce gap and ensuring sustainability of workforce programs. A few positive themes from commentors are as follows:

- Commentors stated that the proposal would promote overall improvement to the quality of care.
- Commentors stated that the proposal would improve program sustainability by increasing workforce retention which helps address workforce burnout.
- Commentors suggested that the FIRST program will help support the recruitment of providers and assist the training of providers to build resilience, further increasing programs' sustainability.

# Theme 2: Request language modification to expand eligibility in the FIRST program

Six of the commenters suggested modifications to FIRST program eligibility by expanding eligibility to include public hospitals, including public teaching hospitals, non-profit teaching hospitals, children's hospitals affiliated with Florida public medical schools, and behavioral health teaching hospitals. These comments exemplify the importance of this demonstration in sustaining a healthcare workforce. As originally proposed, eligibility for the FIRST program was defined as "a public hospital with residents in approved Accreditation Council for Graduate Medical Education training programs as of January 1, 2023."

# Theme 3: Request changes to the accreditation entities for eligibility

Five out of commentors provided comments on the accreditation entities for eligibility. One commentor expressed support for the FIRST program eligibility as proposed without change, particularly for the credentialing bodies. However, four commenters expressed the need to make changes to the FIRST program accreditation entities. All four commenters recommended the American Nurses Credentialing Center (ANCC) or the Commission on Collegiate Nursing Education (CCNE) as the accreditation bodies for the FIRST program.

# Theme 4: Request language modification to expand eligibility in the TEACH program

One commenter expressed great support for the TEACH model. However, asked that AHCA consider the inclusion of interns, particularly clinical social worker, marriage and family therapist, and mental health councilor interns. The commentor also added that by adjusting the language now, it will provide AHCA the flexibility to incorporate interns in anticipation of future state legislation that may add eligibility for interns to be included in the TEACH Program.

# The Agency's Response:

The Agency has carefully considered the public feedback recommending expanded eligibility for the Florida FIRST nursing and the TEACH workforce programs. While we recognize the intent to broaden

access and participation, the decision has been made to maintain the eligibility criteria as originally proposed to support the integrity, effectiveness, and fiscal sustainability of the demonstration.

As a section 1115 demonstration, the Florida FIRST nursing and the TEACH programs are designed to test the impact of targeted investments in clinical workforce education within a defined group of public teaching hospitals and qualified health facilities. Expanding eligibility prematurely would introduce variability that could compromise the rigor of the evaluation and limit our ability to isolate the effects of the intervention. A focused implementation allows for a straight-forward analysis of outcomes, which is essential for drawing actionable policy conclusions.

Maintaining the original eligibility criteria also ensures that available funding is not diluted across many institutions. The resources allocated to these workforce programs must be sufficient to achieve meaningful results at each participating site. If spread too thin, the funding may not yield measurable improvements in nurse training capacity, quality, or retention. We believe this is especially true in facilities that serve a high proportion of Medicaid recipients.

This demonstration is intentionally structured to support data-driven policy development. The state will collect detailed information on program performance, costs, and outcomes. These findings will inform future policy decisions, including the potential expansion of eligible institutions in a way that is guided by evidence rather than speculation. In this manner, Florida is creating a pathway to smarter, more strategic program growth over time.

The eligibility criteria are also consistent with the intent of Florida's "Live Healthy" Act and associated budget authority. The legislation was designed to prioritize support for high-impact institutions that serve Medicaid populations and maintain robust residency training environments. Expanding eligibility at this early stage could exceed the scope of legislative direction and strain the fiscal parameters of the demonstration.

# **ATTACHMENTS**

Attachment A – Florida Administrative Register Notice

# Notice of Meeting/Workshop Hearing AGENCY FOR HEALTH CARE ADMINISTRATION Medicaid

Subject: The Florida Agency for Health Care Administration (Agency) intends to submit to the Centers for Medicare & Medicaid Services (CMS) a proposal to implement a new Title XIX section 1115 demonstration that addresses workforce challenges within Medicaid through implementation of new workforce recruitment and retention programs that will increase access to necessary providers in medically underserved areas. The proposed new five-year demonstration will be called the "Florida Health Care Workforce Sustainability Section 1115 Demonstration." The Agency provides this notice in accordance with federal requirements to inform the public that we are providing a 45-day public comment period on the proposed new demonstration starting on December 11, 2024. The draft application proposal and more detailed information for submitting public comments is available at: <a href="https://ahca.myflorida.com/medicaid/medicaid-policy-quality-and-operations/medicaid-policy-andquality/medicaid-policy/federal-authorities/federal-waivers">https://ahca.myflorida.com/medicaid/medicaid-policy-quality-and-operations/medicaid-policy-andquality/medicaid-policy/federal-authorities/federal-waivers</a>. Hard copies of the application may be obtained by contacting Kimberly Quinn at 850-412-4277 or by email at Kimberly.Quinn@ahca.myflorida.com.

**Date/Time:** January 8, 2025, 1:30 P.M. – 3:30 P.M.

**Location:** The Agency for Health Care Administration, 2727 Mahan Drive, Building 3, Conference Room A, Tallahassee, FL 32308.

**Date/Time:** January 10, 2025, 10 A.M. – 12 P.M.

**Location:** Orlando Hurston Complex, 400 W Robinson St, North Tower N109, Conference Room 1, Orlando, FL 32801

# **Attachment B** – Abbreviated Public Notice

# Florida Agency for Health Care Administration's New Section 1115(a) Medicaid Demonstration for Promoting Health Care Workforce Sustainability

# ABBREVIATED PUBLIC NOTICE

The Florida Agency for Health Care Administration (Agency) intends to submit to the Centers for Medicare & Medicaid Services a proposal to implement a new Title XIX section 1115 demonstration that addresses workforce challenges within Medicaid through implementation of new workforce recruitment and retention programs that will increase access to necessary providers in medically underserved areas. The proposed new five-year demonstration will be called the "Florida Health Care Workforce Sustainability Section 1115 Demonstration" and is requesting federal matching funds to implement workforce training, certification, and loan repayment programs for certain qualified Florida health care practitioners are or will practice or operate in professional shortage areas or medically underserved areas and for health care facilities that provide clinical training to students in specified health care disciplines.

The Agency provides this notice in accordance with federal requirements to inform the public that we are providing a 45-day public comment period on the proposed new demonstration starting on December 11, 2024. The draft application proposal and more detailed information for submitting public comments will be available on that date at: <a href="https://ahca.myflorida.com/medicaid/medicaid-policy-quality-and-operations/medicaid-policyand-quality/medicaid-policy/federal-authorities/federal-waivers">https://ahca.myflorida.com/medicaid/medicaid-policy-quality-and-operations/medicaid-policyand-quality/medicaid-policy/federal-authorities/federal-waivers</a>.

Hard copies of the proposed application can be obtained by contacting Kimberly Quinn at 850-412-4277 or by email at Kimberly.Quinn@ahca.myflorida.com. The Agency will hold two public hearings to solicit comments on the proposed demonstration as listed below:

# **Public Hearing 1:**

Wednesday, January 8, 2025 1:30 P.M. – 3:30 P.M.

The Agency for Health Care Administration 2727 Mahan Drive Building 3, Conference Room A Tallahassee, FL 32308

# **Public Hearing 2:**

Friday, January 10, 2025 10 A.M. – 12 P.M.

Orlando Hurston Complex 400 W Robinson St North Tower N109, Conference Room 1 Orlando, FL 32801

# FLORIDA AGENCY FOR HEALTH CARE ADMINISTRATION

# NEW 5-YEAR SECTION 1115 DEMONSTRATION REQUEST FULL PUBLIC NOTICE

The Florida Agency for Health Care Administration (Agency) intends to submit to the Centers for Medicare & Medicaid Services (CMS) a proposal to implement a new Title XIX section 1115 demonstration that addresses workforce challenges within Medicaid through implementation of new workforce recruitment and retention programs that will increase access to necessary providers in medically underserved areas. The proposed new five-year demonstration will be called the "Florida Health Care Workforce Sustainability Section 1115 Demonstration."

Pursuant to CMS requirements for new, initial section 1115 demonstration programs, the Agency is providing this full public notice in alignment with federal public notice rules at 42 CFR 431.408 to describe the key components of the proposed demonstration. The proposed draft application and other related public notice materials are available for review and public input for a 45-day period starting December 11, 2024 through January 24, 2025 as described in this notice.

# I. Demonstration Program Overview

Health care workforce shortages are widespread nationally. Florida has additional challenges because it is one of the largest and fastest-growing states in the nation. Moreover, Florida is home to a larger percentage of older adults compared to other states. The federal government has recognized the need to invest in the health care workforce and has several initiatives to increase the numbers of health care workers, especially in medically underserved areas. Over the years, Florida Medicaid has made substantial

investments in its health care workforce. However, Florida's health care need is outpacing workforce supply similar to what is occurring across the nation. The need for health care professionals particularly impacts people living in poverty who have higher rates of acute and chronic health conditions and access challenges due to limited transportation, time off from work, and childcare options.<sup>1</sup>

To address these workforce issues, on March 21, 2024, Governor DeSantis approved the "Live Healthy" legislation (SB 7016, SB 7018, SB 330, and SB 1758) to strengthen Florida's health care workforce, increase access to health care services, and incentivize innovation – aspects that are fundamental to establishing a more resilient and patient- focused health care delivery system for Florida residents. Live Healthy received near unanimous bipartisan support from Florida's legislature. Collectively, they took unprecedented action to increase Florida's health care workforce to keep pace with the state's continued rapid population growth and aging population. They created new laws, revised existing laws, and appropriated hundreds of millions of dollars for state agencies to conduct health care workforce expansion objectives.

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<sup>&</sup>lt;sup>1</sup> Health Affairs, Health, Income, & Poverty: Where We Are and What Could Help, October 18, 2018, https://www.healthaffairs.org/do/10.1377/hpb20180817.901935/

Live Healthy builds upon existing foundations to improve health care access and quality, which may serve as a national model because of its innovative focus on workforce supply. Specifically, SB 7016 directs the Agency to seek federal approval to use Title XIX matching funds for the workforce training and loan repayment program components of this strategic investment so that all Florida Medicaid beneficiaries will achieve their highest level of health. The workforce programs proposed under this demonstration proposal are:

- 1. The Training, Education, and Clinicals in Health (TEACH) Funding Program is a workforce training and certification program that will provide funds to participating federally qualified health centers, community mental health centers, certified community behavioral health clinics, and rural health clinics to offset the costs of training residents and students to become licensed health care practitioners that support medically underserved areas.
- 2. Florida Reimbursement Assistance for Medical Education (FRAME) Program allows for loan repayment for primary care physicians, physician assistants, mental health professionals, licensed practical nurses, registered nurses, and advance practice registered nurses.
- 3. **The Dental Student Loan Repayment Program** is a loan repayment program that promotes access to dental care under the Florida Medicaid program by supporting qualified dentists and dental hygienists who treat medically underserved populations in dental health professional shortage areas or medically underserved areas.
- 4. Nursing Indirect Medical Education through the Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program will make semi-annual payments to eligible public teaching hospitals to offset the higher patient care expenses and increased complexity of cases resulting from nursing education.

Florida has also been cited by the Department of Justice as having specific issues related to home care of children with complex medical needs. The Agency is tasked via an injunction with transitioning children in nursing facilities to a home or community-based setting and to incrementally increase the percentage of in-home nursing hours provided for children until 100 percent of authorized hours are staffed. Thus, Florida Medicaid has a priority need for nurses with training in home and community-based pediatric care.

# II. Demonstration Goals and Objectives

The proposed demonstration is expected to bolster Florida's health care workforce to keep pace with the state's rapid population growth and aging population. Accordingly, the goals and objectives of this demonstration are to improve Medicaid beneficiary access to services and quality of care by:

- 1. Enhancing the capacity and effectiveness of Florida's health care workforce to meet the evolving needs of the state's diverse population by implementing targeted training and recruitment programs.
- 2. Improving health care access and quality across Florida by strategically addressing workforce shortages and retention challenges through innovative workforce development initiatives supported by federal funding; and,

3. Developing a resilient framework for community-based health care workforce initiatives aimed at resolving pediatric home care nursing concerns highlighted by the Department of Justice, particularly for children enrolled in Medicaid with complex medical conditions.

# III. Workforce Programs Description

The demonstration will authorize federal medical assistance percentage for the state to operate new programs focused on provider certification, training, and student loan repayment. The goal of these programs is to build up Florida's health care workforce to keep pace with the expected medical demand of the state's growing and aging population. The proposed workforce programs are described in the below table:

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
Program Benefit Description	TEACH will offset the administrative costs and loss of revenue associated with training residents and students to become licensed health care practitioners.	The Dental Student Loan Repayment Program will benefit Florida- licensed dentists and dental hygienists.	FRAME will make payments that offset loans and educational expenses incurred by students for studies leading to a medical, nursing, or mental health degree or licensure.	FIRST will make semi-annual payments to eligible public teaching hospitals to offset higher patient care expenses and increased complexity of cases resulting from nursing education.
Eligible Health Care Practitioners or Qualified Facilities	<ul> <li>Federally qualified health centers</li> <li>Community mental health centers</li> <li>Rural health clinics</li> <li>Certified community behavioral health clinics</li> </ul>	<ul> <li>Dentists</li> <li>Dental hygienists</li> <li>Practitioners must:</li> <li>Demonstrate active employment in a public health program or</li> </ul>	Medical doctors     with primary care     specialties:     obstetrics,     gynecology,     general and family     practice, geriatrics,     internal medicine,     pediatrics,     psychiatry,	Public hospital with residents in a state approved Graduate Medical Education training program as of January 1, 2023.

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
	Each facility must provide appropriate supervision or precepting for one or more of the following categories of residents or students:  • Allopathic or osteopathic residents pursuing a primary care specialty.  • Qualified primary care specialties: general internal medicine, family medicine, obstetrics and gynecology, general pediatrics, psychiatry, geriatric medicine, or any other specialty identified by the state as primary care.  • Dental residents  • Advanced practice registered nursing students pursuing a primary care specialty.  • Nursing students.  • Allopathic or osteopathic medical students.  • Dental students.	private practice that serves Medicaid recipients and other low- income patients and is located in a dental health professional shortage area or a medically underserved area.  Volunteer 25 hours per year providing dental services in a free clinic that is located in a dental health professional shortage area or a medically underserved area, through another volunteer program operated by the state.	osteopathic medicine, and other specialties which may be identified by the state.  • Advanced practice registered nurses registered to engage in autonomous practice per Florida law.  • Advanced practice registered nurses  • Physician assistants  • Mental health professionals, including licensed clinical social workers, licensed marriage and family therapists, licensed mental health counselors, and licensed psychologists  • Licensed practical nurses and registered nurses  • Provide 25 hours annually of volunteer primary care services in a free clinic or through another volunteer program operated by the state.	

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
	<ul> <li>Dental hygiene students.</li> <li>Physician assistant students.</li> <li>Behavioral health students, including students studying psychology, clinical social work, marriage and family therapy, or mental health counseling.</li> </ul>			
Funding Awards	TEACH reimbursement funds to qualified facilities are as follows:  • For qualified facilities, up to \$75,000 per fiscal year  • For qualified facilities that also operate a residency program, up to \$100,000 each fiscal year	Dental loan reimbursement will equal 20% of a dentist's or dental hygienist's principal loan amount at the time he or she applied for the program but may not exceed \$50,000 per year per eligible dentist or \$7,500 per year per eligible dental hygienist	FRAME funds will be awarded for a four-year period of continued proof of practice in a rural or underserved area as designated by DOH:  • Up to \$150,000 for physicians  • Up to \$90,000 for advanced practice registered nurses registered to engage in autonomous practice and practicing autonomously  • Up to \$75,000 for advanced practice registered nurses and physician assistants  • Up to \$75,000 for mental health professionals  • Up to \$45,000 for licensed practical nurses and	FIRST IME payments will equal one-half of the annual computed IME payment (paid on a semiannual basis) calculated by the Agency for eligible teaching hospitals.

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
Fundin -	The state will invest	The state will in a	registered nurses	The state:11 i
Funding Award Process	The state will issue reimbursement based on the number of clinical training hours reported quarterly. The state will reimburse qualified facilities a per student hourly rate by student type as designated in the law.	The state will issue a loan repayment award to qualified dentists or dental hygienists annually, up to a maximum of five awards for each year he or she maintains program eligibility.	The state will issue a loan repayment award that equals 25 percent of a practitioner's principal loan amount at the time he or she applied for the program up to the maximum dollar award at the end of each year that a practitioner participates in the FRAME program and adheres to program requirements.	The state will issue awards based on each hospital's ratio of nursing full-time equivalents to beds and Medicaid inpatient payments.  Semiannual IME payments will be calculated using the most recently filed and available Medicare Cost Report (CMS Form 2552) extracted from the Health care Cost Report Information System and the Florida Hospital Uniform Reporting System (FHURS).
Eligible Expenses	Loan repayment awards can only be used to pay the costs of tuition, books, other educational costs, and reasonable living expenses as determined by the state.	Loan repayment awards can only be used to pay the costs of tuition, books, dental equipment and supplies, uniforms, and reasonable living expenses as determined by the state.	Costs for tuition, matriculation, registration, books, laboratory and other fees, other educational costs, and reasonable living expenses as determined by the state.	Public hospital costs associated with operating Graduate Medical Education training programs approved by the state's Accreditation Council for Graduate Medical Education

# IV. Workforce Programs Description

The demonstration is not intended to enroll individuals into Medicaid as beneficiaries or providers but rather to expand federal support to implement health care workforce training programs that will support enrolled Medicaid members. The demonstration benefits are the training certification and reimbursement and loan repayment programs enacted under Live

Healthy for eligible qualified providers and facilities. There will be no cost-sharing imposed for workforce training offered under the demonstration.

# V. <u>Demonstration Health Care Delivery System</u>

The state utilizes a managed care delivery system for enrolled members with exemptions for certain members only eligible for limited Medicaid coverage. As this demonstration is not providing direct care to Medicaid enrollees, it is not expected to impact program eligibility, enrollment, or the delivery of medical services to program enrollees.

# VI. <u>Demonstration Projected Program Enrollment</u>

This section estimates the ranges of newly qualified practitioners and/or teaching facilities that will be eligible to receive awards over the initial five-year demonstration period. The variance in numbers in each program reflects the differences in the loan reimbursement amount available to different practitioner types. Actual participation in the programs may vary.

- TEACH 633 844 qualified health facilities will be eligible to receive awards each year of the demonstration period. The number varies depending on whether the facility operates a residency program.
- FRAME 2887 9591 licensed or certified health care practitioners professionals, depending on practice area, will be eligible to receive awards each year of the demonstration period.
- Dental Student Loan Repayment Program 459 3065 qualified dentists and dental hygienists will be eligible to receive awards each year of the demonstration period.
- FIRST IME Approximately 13 qualified public hospitals with residency training programs will be eligible to receive awards each year of the demonstration period.

# VII. Demonstration Projected Program Enrollment

The state's total projected expenditures (inclusive of state and federal share) to implement the workforce programs described above over the requested five-year demonstration period are listed in the table below.

Demo Year 01	Demo Year 02	Demo Year 03	Demo Year 04	Demo Year 05
\$641,237,255	\$623,965,857	\$611,679,217	\$605,313,202	\$604,109,264

# VIII. Evaluation Parameters

The state's proposed evaluation parameters to assess the impact of the demonstration on Medicaid workforce are listed in the table below.

Proposed Hypothesis	Anticipated Measure(s)	Proposed Data Sources
The TEACH program will	Number of federally qualified	Agency for Health Care
increase the number	health centers, community mental	Administration Live

Proposed Hypothesis	Anticipated Measure(s)	Proposed Data Sources
federally qualified health centers, community mental health centers, certified community behavioral health clinics, and rural health clinics offering clinical training and/or increase the overall numbers of training slots for the targeted practitioners.	health centers, certified community behavioral health clinics, and rural health clinics offering clinical training.	Healthy program reports
The FRAME program and the Dental Student Loan Repayment Program will increase the recruitment and retention of health care professionals in Florida's medically underserved areas.	Number of practitioners receiving loan repayment who initiate their service commitment.  Length of service in underserved areas by practitioners receiving loan repayment.	Agency for Health Care Administration Live Healthy program reports  Department of Health licensure data
The number of nurses in clinical training will increase.	Number of nurse trainees in TEACH and nursing IME.	Agency for Health Care Administration Florida Center for Nursing
The number of mental health therapists in clinical training will increase.	Number of social work, mental health counseling, marriage and family therapy, and psychology students in TEACH.	Agency for Health Care Administration Live Healthy program reports

# IX. Proposed Waiver and Expenditure Authorities

Section 1115(a)(1) Waiver Authorities	Florda does not anticipate needing any waivers of the provisions under Title XIX of the Social Security Act to implement this demonstration.
Section 1115(a)(2) Expenditure	Florida is requesting expenditure authority to implement
Authorities	the workforce programs proposed therein.

# X. Public Notice and Comment Process

As announced in the abbreviated public notice released in the Florida Administrative Registrar on December 11, 2024, the draft section 1115 demonstration proposal and related public notice materials are posted for a 45-day public comment period starting December 11, 2024 through January 24, 2025 on the Federal Waivers home page located on the Agency's website: <a href="https://ahca.myflorida.com/medicaid/medicaid-policy-quality-and-operations/medicaid-policy-and-quality/medicaid-policy/federal-authorities/federal-waivers">https://ahca.myflorida.com/medicaid/medicaid-policy-quality-and-operations/medicaid-policy-and-quality/medicaid-policy/federal-authorities/federal-waivers</a>.

The Agency will conduct two public hearings on the proposed application as listed below:

# **Public Hearing 1:**

Wednesday, January 8, 2025 1:30 P.M. – 3:30 P.M.

The Agency for Health Care Administration 2727 Mahan Drive Building 3, Conference Room A Tallahassee, FL 32308

# **Public Hearing 2:**

Friday, January 10, 2025 10 A.M. – 12 P.M.

Orlando Hurston Complex 400 W Robinson St North Tower N109, Conference Room 1 Orlando, FL 32801

Interested parties may submit written comments electronically via email to FLMedicaidWaivers@ahca.myflorida.com or may send written comments concerning the proposed new demonstration to:

Agency for Health Care Administration Managed Medical Assistance Amendment 2727 Mahan Drive, MS #20 Tallahassee, Florida 32308

Hard copies of the proposed application can be obtained by contacting Kimberly Quinn at 850-412-4277 or by email at Kimberly.Quinn@ahca.myflorida.com.

Pursuant to the provisions of the Americans with Disabilities Act, any person requiring special accommodations to participate in this workshop/meeting is asked to advise the agency at least seven days before the workshop/meeting by contacting Kimberly Quinn at 850-412-4277 or by email at Kimberly.Quinn@ahca.myflorida.com.

If you are hearing or speech impaired, please contact the agency using the Florida Relay Service, 1 (800) 955-8771 (TTY) or 1 (800) 955-8770 (Voice).

# **Attachment D** – Tribal Notice

This email is to notify the Seminole/Miccosukee Tribe of Florida that the Florida Agency for Health Care Administration (Agency) intends to submit to the Centers for Medicare & Medicaid Services (CMS) a proposal to implement a new Title XIX section 1115 demonstration that addresses workforce challenges within Medicaid through implementation of new workforce recruitment and retention programs that will increase access to necessary providers in medically underserved areas. The proposed new five-year demonstration will be called the "Florida Health Care Workforce Sustainability Section 1115 Demonstration."

Pursuant to CMS requirements for new section 1115 demonstration programs, the Agency is providing this notice in alignment with federal public notice rules at 42 CFR 431.408 to describe the key components of the proposed demonstration.

# **Demonstration Program Overview**

Health care workforce shortages are widespread nationally. Florida has additional challenges because it is one of the largest and fastest-growing states in the nation. Moreover, Florida is home to a larger percentage of older adults compared to other states. The federal government has recognized the need to invest in the health care workforce and has several initiatives to increase the numbers of health care workers, especially in medically underserved areas. Over the years, Florida Medicaid has made substantial investments in its health care workforce. However, Florida's health care need is outpacing workforce supply similar to what is occurring across the nation. The need for health care professionals particularly impacts people living in poverty who have higher rates of acute and chronic health conditions and access challenges due to limited transportation, time off from work, and childcare options. [1]

To address these workforce issues, on March 21, 2024, Governor DeSantis approved the "Live Healthy" legislation (SB 7016, SB 7018, SB 330, and SB 1758) to strengthen Florida's health care workforce, increase access to health care services, and incentivize innovation – aspects that are fundamental to establishing a more resilient and patient-focused health care delivery system for Florida residents. Live Healthy received near unanimous bipartisan support from Florida's legislature. Collectively, they took unprecedented action to increase Florida's health care workforce to keep pace with the state's continued rapid population growth and aging population. They created new laws, revised existing laws, and appropriated hundreds of millions of dollars for state agencies to conduct health care workforce expansion objectives.

<sup>[1]</sup> Health Affairs, Health, Income, & Poverty: Where We Are and What Could Help, October 18, 2018, https://www.healthaffairs.org/do/10.1377/hpb20180817.901935/

Live Healthy builds upon existing foundations to create multiple approaches to health care-related education programs that could establish Florida as a national model for quality and accessible health care. The Live Healthy Act directs the Agency to seek federal approval to use Title XIX matching funds for the workforce training and loan repayment program components of this strategic investment so Floridians can have more options and opportunities to live healthy. The Agency will also seek additional federal support for an Indirect Medical Education (IME) program operating since 2021 to support hospitals with physician residents. The IME program provides over \$705 million annually to cover the costs associated with residency training programs that are known to incur higher patient care costs relative to non-teaching hospitals. The workforce training programs the Agency seeks to implement are described in the below table:

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
Program Benefit Description	TEACH will offset the administrative costs and loss of revenue associated with training residents and students to become licensed health care practitioners.	The Dental Student Loan Repayment Program will benefit Florida- licensed dentists and dental hygienists.	FRAME will make payments that offset loans and educational expenses incurred by students for studies leading to a medical, nursing, or mental health degree or licensure.	FIRST will make semi- annual payments to eligible public teaching hospitals to offset higher patient care expenses and increased complexity of cases resulting from nursing education.
Eligible Health Care Practitioners	Federally qualified health centers	<ul><li>Dentists</li><li>Dental hygienists</li></ul>	Medical doctors with primary care specialties:	Public hospital with residents in a state

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
or Qualified Facilities	<ul> <li>Community mental health centers</li> <li>Rural health clinics</li> <li>Certified community behavioral health clinics</li> <li>Each facility must provide appropriate supervision or precepting for one or more of the following categories of residents or students:</li> <li>Allopathic or osteopathic residents pursuing a primary care specialty.</li> <li>Qualified primary care specialties: general internal medicine, family medicine, obstetrics</li> </ul>	Practitioners must:  Demonstrate active employment in a public health program or private practice that serves Medicaid recipients and other low-income patients and is located in a dental health professional shortage area or a medically underserved area.  Volunteer 25 hours per year providing dental services in a free clinic	obstetrics, gynecology, general and family practice, geriatrics, internal medicine, pediatrics, psychiatry, osteopathic medicine, and other specialties which may be identified by the state.  • Advanced practice registered nurses registered to engage in autonomous practice per Florida law.  • Advanced practice registered nurses Physician assistants	approved Graduate Medical Education training program as of January 1, 2023.

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
	and gynecology, general pediatrics, psychiatry, geriatric medicine, or any other specialty identified by the state as primary care.  Dental residents Advanced practice registered nursing students pursuing a primary care specialty. Nursing students. Allopathic or osteopathic medical students. Dental students. Dental hygiene students. Dental hygiene students. Physician assistant students. Behavioral health students, including students	that is located in a dental health professional shortage area or a medically underserved area, through another volunteer program operated by the state.	<ul> <li>Mental health professionals, including licensed clinical social workers, licensed marriage and family therapists, licensed mental health counselors, and licensed psychologists</li> <li>Licensed practical nurses and registered nurses</li> <li>Provide 25 hours annually of volunteer primary care services in a free clinic or through another volunteer program operated by the state.</li> </ul>	

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
	studying psychology, clinical social work, marriage and family therapy, or mental health counseling.			
Funding Awards	reimbursement funds to qualified facilities are as follows:  • For qualified facilities, up to \$75,000 per fiscal year  • For qualified facilities that also operate a residency program, up to \$100,000 each fiscal year	Dental loan reimbursement will equal 20% of a dentist's or dental hygienist's principal loan amount at the time he or she applied for the program but may not exceed \$50,000 per year per eligible dentist or \$7,500 per year per eligible dental hygienist	FRAME funds will be awarded for a four-year period of continued proof of practice in a rural or underserved area as designated by DOH:  • Up to \$150,000 for physicians • Up to \$90,000 for advanced practice registered nurses registered to engage in autonomous practicing autonomously • Up to \$75,000 for advanced	FIRST IME payments will equal one-half of the annual computed IME payment (paid on a semiannual basis) calculated by AHCA for eligible teaching hospitals.

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
			practice registered nurses and physician assistants  Up to \$75,000 for mental health professionals  Up to \$45,000 for licensed practical nurses and registered nurses	
Funding Award Process	The state will issue reimbursement based on the number of clinical training hours reported quarterly. The state will reimburse qualified facilities a per student hourly rate by student type as designated in the law.	The state will issue a loan repayment award to qualified dentists or dental hygienists annually, up to a maximum of five awards for each year he or she maintains program eligibility.	The state will issue a loan repayment award that equals 25 percent of a practitioner's principal loan amount at the time he or she applied for the program up to the maximum dollar award at the end of each year that a practitioner participates in the FRAME program	The state will issue awards based on each hospital's ratio of nursing full-time equivalents to beds and Medicaid inpatient payments. Semiannual IME payments will be calculated using the most

Program Component	Training, Education, and Clinicals in Health (TEACH) Funding Program	Dental Student Loan Repayment Program	Florida Reimbursement Assistance for Medical Education (FRAME) Program	The Florida Funding Initiative for the Recruitment, Sustainment, and Training of Nursing (FIRST) Program
			and adheres to program requirements.	recently filed and available Medicare Cost Report (CMS Form 2552) extracted from the Healthcare Cost Report Information System and the Florida Hospital Uniform Reporting System (FHURS).
Eligible Expenses	Loan repayment awards can only be used to pay the costs of tuition, books, other educational costs, and reasonable living expenses as determined by the state.	Loan repayment awards can only be used to pay the costs of tuition, books, dental equipment and supplies, uniforms, and reasonable living expenses as determined by the state.	Costs for tuition, matriculation, registration, books, laboratory and other fees, other educational costs, and reasonable living expenses as determined by the state.	Public hospital costs associated with operating Graduate Medical Education training programs approved by the state's Accreditation Council for Graduate

Program	Training, Education,	Dental Student	Florida	The Florida
Component	and Clinicals in	Loan	Reimbursement	Funding
	Health (TEACH)	Repayment	Assistance for	Initiative for
	Funding Program	Program	Medical	the
			Education	Recruitment,
			(FRAME) Program	Sustainment,
				and Training
				of Nursing
				(FIRST)
				Program
				Medical
				Education

The demonstration is not intended to enroll individuals into Medicaid as beneficiaries or providers but rather to expand federal support to implement provider workforce training programs that will support enrolled Medicaid members. The demonstration benefits are the training certification and reimbursement and loan repayment programs enacted under Live Healthy for eligible qualified providers and facilities. There will be no cost-sharing imposed for workforce training offered under the demonstration. As this demonstration is not providing direct care to Medicaid enrollees, it is not expected to impact program eligibility, enrollment, or the delivery of medical services to program enrollees. The full document is available on our website if you would like to review.

To make comments or to request additional information on the proposed demonstration, please contact Kimberly Quinn by phone at (850) 412-4227 or email at <a href="mailto:Kimberly.Quinn@ahca.myflorida.com">Kimberly.Quinn@ahca.myflorida.com</a>. If we do not hear from you within 45 days from the receipt of this notice, we will assume that you have no comments.

Thank you,

# Meagan Owens

Administrator, Federal Authorities
Bureau of Medicaid Policy
Agency for Health Care Administration



# Seminole Tribe Notification:

Notice of Florida Medicaid Health Care Workforce Sustainability Section 1115 Demonstration Application

← Reply ← Reply All → Forward ...

Hello Dr. Kiswani-Barley,

This email is to notify the Seminole Tribe of Florida that the Florida Agency for Health Care Administration (Agency) intends to submit to the Centers for Medicare & Medicard Services (CMS) a proposal to implement a new Title XIX section 113 demonstration that addresses workforce challenges within Medicard through implementation of new workforce centilment and retention programs that will increase access to necessary providers in medically underserved areas. The proposed new five-year demonstration will be a called the "Florida the Tare Workforce Sustainability Section 1115 Demonstration."

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#### Demonstration Program Overview

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To address these workforce issues, on March 21, 2024, Governor DeSantis approved the "Live Healthy" legislation (S8 7016, SB 7018, SB 330, and SB 1758) to strengthen Florida's health care workforce, increase access to health care services, and incentivize innovation—aspects that are fundamental to establishing a more resilient and patient-focused health care delivery system for Florida residents. Live Healthy received near unanimous bipartisan support from Florida's legislature. Collectively, they took unprecedented action to increase Florida's health care worlforce to keep pace with the state's continued rapid population growth and aging population. They created new laws, revised existing laws, and appropriated hundreds of millions of dollars for state agencies to conduct health care workforce expansion objectives.

Live Healthy builds upon existing foundations to create multiple approaches to health care-related education programs that could establish Florids as a national model for quality and accessible health care. The Live

# Miccosukee Tribe Notification:

Notice of Florida Medicaid Health Care Workforce Sustainability Section 1115 Demonstration Application



Hello Cassandra.

This ernal is to notify the Miccosukse Tribe of Florida that the Florida Agency for Health Care Administration (Agency) intends to submit to the Centers for Medicare & Medicaid Services (CMS) a proposal to implement a new Title XX section 1115 demonstration that addresses workforce challenges within Medicaid through intended to the representation of new workforce recruitment and retention programs that will increase access to necessary providers in medically underserved areas. The proposed new five-year demonstration will be called the "Florida Health Care Workforce Sustainability Section 1115 Demonstration."

Pursuant to CMS requirements for new section 1115 demonstration programs, the Agency is providing this notice in alignment with federal public notice rules at 42 CFR 431.408 to describe the key components of the

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Health care workforce shortages are widespread nationally. Florida has additional challenges because it is one of the largest and fastest-growing states in the nation. Moreover, Florida is home to a larger percentage of older adults compared to other states. The federal government has recognized the need to invest in the health care workforce and has several initiatives to increase the numbers of health careworkers, especially in medically underserved areas. Over the years, Florida Medicaid has made substantial investments in its health care workforce. However, Florida's health care need is outpacing workforce supply similar to what is occurring across the nation. The need for health care professionals particularly impacts people living in poverty who have higher rates of acute and chronic health conditions and access challenges due to limited transportation, time off from work, and childcare cotions. "I

To address these workforce issues, on March 21, 2024, Governor DeSantis approved the "Live Healthy" legislation (SB 7016, SB 7018, SB 330, and SB 1758) to strengthen Florida's health care workforce, increase access to health care services, and incentivize innovation—aspects that are fundamental to establishing a more resilient and patient-focused health care delivery system for Florida residents. Live Healthy received near unanimous bipartisan support from Florida's legislature. Collectively, they took unprecedented action to increase Florida's health care workforce to keep pace with the state's continued rapid population growth and aging population. They created new laws, revised existing laws, and appropriated hundreds of millions of dollars for state agencies to conduct health care workforce expansion objectives.

Live Healthy builds upon existing foundations to create multiple approaches to health care-related education programs that could establish Florida as a national model for quality and accessible health care. The Live