Missouri Gateway to Better Health Demonstration Number 11-W-00250/7 Section 1115 Draft Annual Report

Demonstration Year: 13 (10/01/2021 - 09/30/2022)

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I. Introduction

On July 28, 2010, Centers for Medicare and Medicaid Services (CMS) approved the State of Missouri's "Gateway to Better Health" demonstration, which preserved access to ambulatory care for low-income, uninsured individuals in St. Louis City and County. The demonstration was amended in June 2012, to enable the Safety Net Pilot Program to be implemented by July 1, 2012. The July 1, 2012, implementation of the Pilot Program ensured patients of the St. Louis safety net maintained access to primary and specialty care. CMS approved a one-year extension of the demonstration on September 27, 2013, July 16, 2014, December 11, 2015, June 16, 2016, and again on September 1, 2017 for a five-year extension. The state has been authorized to spend up to \$30 million (total computable) annually to preserve and improve primary and specialty care in St. Louis in lieu of spending that amount of statutorily authorized funding on payments to disproportionate share hospitals (DSHs). The demonstration includes the following main objectives:

- I. Preserve and strengthen the St. Louis City and St. Louis County safety net of health care providers available to serve the uninsured;
- II. Connect the uninsured to a primary care home, which will enhance coordination, quality, and efficiency of health care through patient and provider involvement; and
- III. Maintain and enhance quality service delivery strategies to reduce health disparities.

For the first two years of the demonstration, through June 30, 2012, certain providers, referred to as Affiliation Partners, were paid directly for uncompensated care. These providers included St. Louis ConnectCare, Affinia Healthcare (formerly known as Grace Hill Health Centers), and CareSTL Health (formerly known as Myrtle Hilliard Davis Comprehensive Health Centers).

The program transitioned to a coverage model pilot on July 1, 2012. From July 1, 2012, to December 31, 2013, the Pilot Program provided primary, urgent, and specialty care coverage to uninsured ¹ adults in St. Louis City and St. Louis County, aged 19-64, who were below 133% of the Federal Poverty Level (FPL). The demonstration was scheduled to expire on December 31, 2013.

The state also had authority through December 31, 2013, to claim as administrative costs limited amounts incurred by the Saint Louis Regional Health Commission (SLRHC) pursuant to an MOU for functions related to emergency room diversion efforts through the Community Referral Coordinator program.

The Missouri legislature did not expand Medicaid eligibility during its 2013-2017 legislative sessions. Therefore, on September 27, 2013, July 16, 2014, December 11, 2015, and again on June 16, 2016, CMS approved one-year extensions of the Gateway demonstration program for patients up to 100% FPL. On September 1, 2017, CMS approved a five-year extension of the demonstration program for patients up to 100% FPL.

In February 2015, the State of Missouri, Department of Social Services (DSS), requested authority to amend the Gateway program to provide coverage for brand name insulin and asthma inhalers where a generic alternative was otherwise unavailable. This request was approved with an implementation date of January 1, 2016.

¹ To be considered "uninsured," applicants must not be eligible for coverage through the Medicaid State Plan. Screening for Medicaid eligibility is the first step of the Gateway to Better Health eligibility determination.

In August 2018, the state requested authority to amend the Gateway program to include a substance use treatment benefit. This request was approved with a February 1, 2019 implementation date. This additional benefit covers outpatient substance use services, including pharmacotherapy, for substance use disorder treatment of Gateway enrollees with an SUD-related diagnosis. All office visits and generic pharmaceuticals are to be provided by the primary care home and are considered a core primary care service.

In October 2019, the state requested authority to further amend the Gateway program to include a physical function improvement benefit. The amendment request was approved in November 2020, with an implementation date of January 1, 2021, to cover office visits for physical therapy, occupational therapy, chiropractic, and acupuncture services for Gateway enrollees with pain-related diagnoses. Physical function services are to be provided by the primary care home and are considered a core primary care service.

In order to meet the requirements for the demonstration project, the State of Missouri Department of Social Services asked the SLRHC to lead planning efforts to determine the Pilot Program design and to incorporate community input into the planning process. Accordingly, on July 21, 2010, the SLRHC approved the creation of a "Pilot Program Planning Team." The MO HealthNet Division of the Missouri Department of Social Services is represented on the Planning Team to ensure the SLRHC and MO HealthNet are working closely to develop deliverables and to fulfill the milestones of the demonstration project.

The information provided in this annual report shares demonstration progress outcomes and key developments for Demonstration Year 13 (October 1, 2021 – September 30, 2022).

Extension of the Gateway Demonstration

The Gateway demonstration aimed to provide a bridge to sustainable health care for safety net providers and their uninsured patients in St. Louis City and St. Louis County until coverage options became available through federal health reform. The demonstration project was approved for five years, from January 1, 2018 to December 31, 2022. This five-year extension enabled the uninsured population to continue to access preventative and other ambulatory health care services.

In August of 2020, Missouri voters passed a constitutional ballot measure enabling an expansion of Missouri Medicaid (MO HealthNet) eligibility, allowing members covered under the Gateway to Better Health demonstration to likely qualify for insurance options available under MO HealthNet. The State of Missouri began the review process for these members in the first quarter of Demonstration Year 13, transitioning members from Gateway's temporary insurance model to longer term coverage via Missouri Medicaid. The Gateway to Better Health Program is on target to conclude on December 31, 2022, after MO HealthNet benefits are explored for all current Gateway members.

II. Operational Updates

Impact of COVID-19

The COVID-19 pandemic severely disrupted health care delivery systems across the St. Louis region, impacting multiple evaluation measures for the Gateway to Better Health demonstration. The State of Missouri and the SLRHC worked closely alongside the Pilot Program Planning Team, health center partners, and Gateway to Better Health members, to respond to this crisis as a collective team, ensuring sustained access to health care for patients. As the Gateway project comes to a close, centers are functioning at nearly full capacity, but remain occupied with appropriate COVID-19 response, including the oversight of community testing and vaccination initiatives that continue to support the region.

The pandemic affected providers and Gateway members in both predictable and unforeseen ways. Irregularities were experienced in Gateway enrollment, finances, and patient access. Any irregularities in expected data collection and outcomes shall be noted throughout the report. Plans for future submission of delayed data is also noted within each section.

Engagement of SLRHC Advisory Boards and Teams

Each month, the SLRHC shares information and gathers input about the demonstration from its 20-member board of directors and three advisory boards. Full rosters of the advisory boards may be found at www.stlrhc.org. The SLRHC shares monthly financial, enrollment, and customer service reports about the program with its advisory boards in addition to the Pilot Program Planning Team and the committees that report to this team. These committees include the Operations and Finance workgroups. Members of the community, health center leadership and medical staff, and external medical providers are represented on these committees. Full rosters of the Pilot Program Planning Team and the committees that report to this team can be found in Appendix III of this report. With continual input from these diverse stakeholders, the SLRHC is able to foster inter-agency cooperation and communication, as well as proactively prevent operational challenges. All key decisions go through multiple advising committees before any changes are implemented to the Gateway to Better Health demonstration.

Community Meetings and Patient/Provider Communications

The SLRHC hosted virtual public meetings to inform community stakeholders about the Gateway program throughout the demonstration year. These meetings provided information on Gateway enrollment, trends in accessing safety net services, and any changes to the Gateway network.

On May 17, 2022, a Post Award Public Notice Input session was held to inform the public on the progress of the Gateway demonstration and to receive feedback about the program as it advances. The notice for this meeting was posted on the MO HealthNet website 30 days in advance. The meeting was held virtually as part of a joint meeting of the SLRHC's Community, Patient, and Provider Services Advisory Boards. Forty-seven individuals attended the session.

The key conclusion gleaned from the public hearing was that the Gateway to Better Health Demonstration fulfilled its mission of serving as a bridge to health care access for low-income uninsured residents until

Missouri Medicaid expansion offerings became available to this population. Though a limited program in scope, low-income adults were able to access robust care while simultaneously establishing relationships with service providers that will likely continue as members transition to MO HealthNet benefits via Medicaid expansion. Lessons learned across this five-year extension cycle, which will be shared further in the project's summative report, also highlight stark equity issues observed across the St. Louis region that health care access alone cannot fully address. Full results of this public forum can be found in Appendix II.

Public Input:

- "GBH has been a much needed, albeit limited, lifeline for people not eligible for Medicaid or Marketplace insurance plans. The RHC has been an excellent steward of the program and has not only responded to community need but has also proactively sought input from community stakeholders to optimize resources"
 - Physician, Provider Services Advisory Board member
- "I think that GBH, while not insurance, also served as a socializer to healthcare and healthcare
 systems for folks who may not have ever had to navigate those spaces and negotiate what is
 covered and what isn't. I could see that folks on GBH would better navigate the Medicaid system"
 Provider Services Advisory Board member
- "Gateway was a bridge. A much longer bridge than we anticipated when we started. The data
 demonstrates a sobering reality. Access alone does not equate to positive health outcomes.
 Gateway helps us to understand that as we move into Medicaid expansion and access to coverage"
 Community Advisory Board member
- "Some members complained of difficulty navigating the provider network. But, overall, they appreciated having coverage"
 - Patient Advisory Board member

III. Performance Metrics

Coverage for Beneficiaries and the Uninsured Population: Enrollment

Gateway primary care providers work with their uninsured patients, including young adult patients aging out of Medicaid, to assess their eligibility for Gateway and other programs, and to enroll them in the Pilot Program as applicable. As of October 1, 2022, 13% of Gateway enrollees were between the ages of 19 and 29; 18% between the ages of 30 and 39; 27% between the ages of 40 and 49; 28% between the ages of 50 and 59; and 14% between the ages of 60 and 64.

In March 2020, the Missouri Department of Social Services (DSS) suspended disenrollment from the MO HealthNet (Medicaid) program through the end of the Federal Emergency as outlined in the Families First Coronavirus Response Act. This also resulted in a disenrollment suspension for the Gateway to Better Health demonstration, as eligibility and enrollment in the program is determined by DSS. Due to the continued extensions of the Federal Emergency, the pause in disenrollment for Gateway to Better Health continued throughout the end of Demonstration Year 13 and ensured that continuity of care remains stable for Gateway patients throughout the crisis.

The coverage model provides primary, urgent, and specialty care coverage to uninsured adults in St. Louis City and St. Louis County, with incomes up to 100% FPL. As of October 1, 2022, 975 unique individuals, with 121,934 member months, were enrolled in Gateway to Better Health. This is in contrast to the close of the previous Demonstration Year of October 1, 2021 (DY12), with 16,394 members enrolled. The bulk of the project's members have successfully transitioned to care under other forms of Medicaid coverage. Pilot Program enrollment by health center in Demonstration Year 13 is provided below:

Pilot Program Enrollment by Population ^{2,3}

Demonstration Populations	Unique Individuals Enrolled as of October 1, 2022	Member Months October 2021 – September 2022
Population 1: Uninsured individuals receiving both Primary and Specialty Care through the demonstration	975	121,934
Population 2. Uninsured individuals receiving only Specialty Care through the demonstration (<133% of FPL)	N/A	N/A
Population 3. Uninsured individuals receiving only Specialty Care through the demonstration (134-200% of FPL)	N/A	N/A
Total for All Populations	975	121,934

² Enrollment numbers are based on MO HealthNet enrollment data as of October 1, 2022.

³ The current reporting period began October 2021 with 16,394 enrollees and closed with 975 enrollees. Total member months appear inflated when compared to the demonstration year's closing enrollment, due to higher levels of enrollment for the first half of the reporting cycle. To provide a more accurate picture of enrollment, a chart of the project's monthly disenrollment can be found below, titled "Gateway Member Disenrollment by Month, October 2021 – September 2022" (pg.9).

Gateway to Better Health Enrollment by Health Center ^{2,3}

Health Center	Unique Individuals Enrolled as of October 1, 2022	Member Months October 2021 - September 2022
BJK People's Health Centers	174	21,400
Family Care Health Centers	86	12,341
Affinia Healthcare	392	50,167
CareSTL Health	186	22,298
St. Louis County Dept. of Health	137	15,728
Total	975	121,934

Wait Lists

There were no waiting lists during Demonstration Year 13. As the demonstration year closed, the state had successfully transitioned approximately 94% of Gateway to Better Health members to Medicaid coverage.

Disenrollment

During Demonstration Year 13, a total of 15,480 members were disenrolled from Gateway, averaging 1,290 members each month. The table below provides Gateway disenrollment by month in Demonstration Year 13:

Gateway Member Disenrollment by Month, October 2021 – September 2022 ²

Month	Beginning Enrollment	New Enrollment	Disenrollment	Net Change	End of Month Enrollment
October 2021	16,394	30	439	-409	15,985
November 2021	15,985	9	456	-447	15,538
December 2021	15,538	8	638	-630	14,908
January 2022	14,908	7	472	-465	14,443
February 2022	14,443	4	540	-536	13,907
March 2022	13,907	2	1,044	-1,042	12,865
April 2022	12,865	0	1,889	-1,889	10,976
May 2022	10,976	1	2,635	-2,634	8,342
June 2022	8,342	0	2,369	-2,369	5,973
July 2022	5,973	0	3,696	-3,696	2,277
August 2022	2,277	0	1,111	-1,111	1,166
September 2022	1,166	0	191	-191	975
Total	N/A	61	15,480	-15,419	N/A

In DY13, there were 61 additions to enrollment and 15,480 members disenrolled, for a net decrease of 15,419 members during the demonstration year.

Coverage for Beneficiaries and the Uninsured Population: Utilization

Outlined below are key findings regarding the Gateway project's service utilization for Demonstration Year 13 (October 1, 2021 – September 30, 2022). Information presented is based primarily on an initial review of Gateway claims and service referral data.

Primary and Dental Care

Gateway provided over 11,100 primary care and dental visits during Demonstration Year 13. Primary care physicians saw 770 patients in their offices each month, while dentists at community health centers saw approximately 157 patients monthly. The table below reviews the annual distribution of primary and dental care office visits by provider:

Primary Care and Dental Office Visits by Rendering Provider, October 1, 2021 – September 30, 2022 ⁴

Provider	Primary Care Office Visits	Dental Office Visits	Total Visits
BJK People's Health Centers	2,033	363	2,396
Family Care Health Centers	1,454	243	1,697
Affinia Healthcare	2,614	925	3,539
CareSTL Health	1,465	186	1,651
St. Louis County Dept. of Health	1,684	174	1,858
All Providers	9,250	1,891	11,141

Medications

Gateway provided more than 83,900 medications to manage chronic conditions and other diseases in Demonstration Year 13, including more than 6,600 prescriptions for insulin and asthma inhalers.

Specialty Care

Providers made roughly 850 referrals for specialty care services each month. Of the approximately 10,100 referrals made in Demonstration Year 13, more than 4,200 were for diagnostic services and more than 1,100 were for surgical procedures.

Gateway provided over 4,100 specialty office visits in Demonstration Year 13. The table below reviews the annual distribution of specialty care office visits by provider.

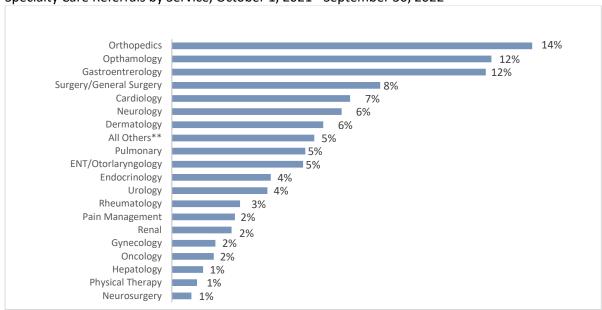
Specialty Care Office Visits by Rendering Provider, October 1, 2021 – September 30, 2022 ⁴

Provider	Specialty Care Visits
SLUCare	1,113
Washington University School of Medicine	2,731
All Other Providers ⁵	270
Total	4,114

⁴ Reported utilization based on Gateway claims data as of November 30, 2022.

⁵ Other providers include the following: BJC Medical Group, Mercy Clinic Gastroenterology LLC, Mercy Clinic Heart & Vascular LLC, SSM Medical Group.

Orthopedics, ophthalmology, and gastroenterology were the leading specialty care services to which Gateway patients were referred. The percent of specialty care referrals by service for Demonstration Year 13 is further detailed below:



Specialty Care Referrals by Service, October 1, 2021 - September 30, 2022 ⁶

Changes in referral rates to specialists were greatly impacted by COVID-19 and the transition of Gateway members to Medicaid coverage. Referrals during Demonstration Year 13 decreased approximately 56% over Demonstration Year 12.

Urgent Care

Gateway provided over 1,400 urgent care visits in Demonstration Year 13. Between October 1, 2021 and September 30, 2022, there were approximately 118 urgent care visits each month.

Urgent Care Office Visits by Rendering Provider, October 1, 2021 – September 30, 2022 ⁴

Provider	Urgent Care Visits
Affinia Healthcare	1,083
SSM Urgent Care ⁷	334
All Providers	1,417

^{**}Other services include Allergy, Endoscopy, Hematology, Infectious Disease, Interventional Radiology, Pathology, and Wound Management.

⁶ Reported specialty care referrals are based on Automated Health Systems data as of November 4, 2022.

⁷ SSM Urgent Care provides urgent care services for BJK People's Health Centers, Family Care Health Centers, and St. Louis County Department of Health Gateway members.

Quality and Cost of Care

The Gateway program has operationalized its commitment to quality with a provider incentive program. The state withholds 7% from payments made to the primary care health centers. These funds are used to pay provider incentives based upon provider performance on two sets of quality measures, Tier 1 and Tier 2. Tier 1 measures are:

- All Newly Enrolled Patients- Minimum of at least 1 office visit within 1 year (6 months before/after enrollment date)
- Patients with Diabetes, Hypertension, CHF or COPD Minimum of at least 2 office visits within 1
 year (6 months before/after reporting period start date)
- Patients with Diabetes Have one HbA1c test within 6 months of reporting period start date
- Patients with Diabetes Have a HbA1c less than or equal to 9% on most recent HbA1c test within the reporting period
- Hospitalized Patients Among enrollees whose primary care home was notified of their
 hospitalization by the Gateway Call Center, the percentage of patients who have been contacted
 (i.e. visit or phone call for status/triage, medical reconciliation, prescription follow up, etc.) by a
 clinical staff member from the primary care home within 7 days after hospital discharge.

Impact of COVID-19 Pandemic

The SLRHC recognizes the burden placed on our health care community to respond to our most vulnerable populations during this crisis. The procurement of urgent medical supplies and equipment, the costs of testing patients, transitional staffing, treatment services and basic equipment to expand capacity, and navigation services to meet the needs of the increased demand has been paramount for our community health care organizations. As a result, criteria measures established for provider incentive payments would reflect COVID-related restrictions, rather than provider performance. Consequently, the SLRHC and its stakeholders determined that the suspension of the incentive procedures for this performance period was essential to bolster health center stability and to ensure that Gateway providers are able to provide primary care services to this vulnerable population throughout the pandemic. This suspension has continued to be supported by the Pilot Planning Team and will continue throughout the public health crisis. As such, incentive payment amounts withheld from providers during the January 1, 2022 – June 30, 2022 reporting period were returned in full as outlined below.

Primary Care Health Center Pay-for-Performance Results

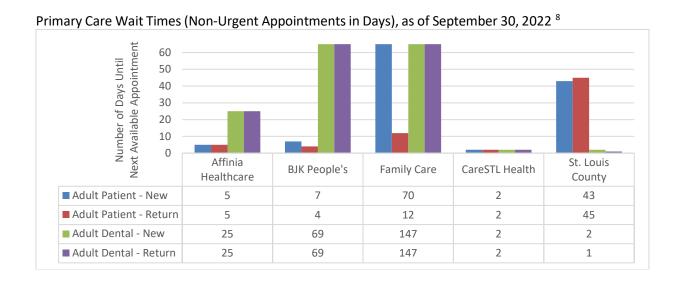
During the January – June 2022 performance period, the PCHC Incentive Pool (PIP) was valued at \$358,283.32, as summarized below by health center. These incentive amounts for the period were returned in full.

Description			AH	ВЈКР	CSH	FC	County
Number of Criteria Met	а		0	0	0	0	0
Criteria Weight b			20%	20%	20%	20%	20%
Incentive Pool Percentage Earned	$c = a \times b$	b 0%		0%	0%	0%	0%
Incentive Amount Withheld	d	\$	147,903.35	\$ 63,004.45	\$ 66,027.31	\$ 36,020.57	\$ 45,327.64
Incentive Amount Earned	$e = c \times d$	\$	-	\$ -	\$ -	\$ -	\$ -
Remaining Balance in PCHC Pool	f = d - e	\$	147,903.35	\$ 63,004.45	\$ 66,027.31	\$ 36,020.57	\$ 45,327.64

Access to Care Outcomes

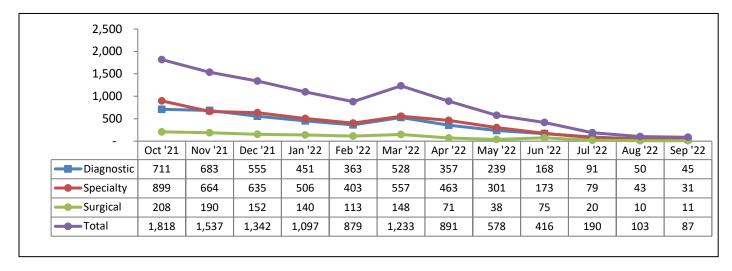
During Demonstration Year 13, the call center answered 5,193 calls, averaging approximately 21 calls per business day. Of calls answered during this time, 26 (less than one percent) resulted in a consumer complaint. Due to a decrease in enrollment, Demonstration Year 13 had approximately 50% less calls and 63% less member complaints in comparison with the prior demonstration year. The most common source of complaints for this cycle were related to "Access to Care" and "Transportation". Access to Care encompasses a range of issues including the patient's ability to get a timely appointment, get a prescription filled, get a referral to see a specialist, as well as coordinating specialty care with primary care homes. Each consumer issue was resolved directly with the patient and associated provider(s).

Primary and specialty care wait times are monitored to measure access to care. At the close of Demonstration Year 13, on average, new patients were able to access primary care services within approximately 25 days and returning patients in under two weeks. However, as has been demonstrated in previous reporting, the pandemic continues to influence patient access to dental services. The average wait time across clinic partners for both new and new and returning patients is roughly 7 weeks. Two clinic partners are currently able to see dental patients within a few business days, while other partners reported wait times as high as 2-5 months before an appointment was available. The following table displays the primary care wait times as of the end of DY13 (September 30, 2022).



Specialty care referrals are also closely monitored to ensure patients receive the additional medical care not available to members within the primary care setting. As is evident across other Gateway service lines, specialty care referrals for DY13 began to decrease as members transitioned to Medicaid coverage. The monthly referral average across DY12 was roughly 1,900 referrals per month. As members began to transition to other forms of coverage, beginning in October 2021, referrals made through the Gateway program began to decrease slowly month over month. Demonstration Year 13 results are presented in the table below.

Medical Referrals by Type and Pilot Program Month, October 2021 – September 2022 ⁶



⁸ Wait times are self-reported as a point in time metric by individual health centers as of September 30, 2022 and calculated for Gateway patients only.

Beneficiary and Provider Satisfaction Survey

The state and SLRHC are continually monitoring the performance of the Pilot Program to ensure it is providing access to quality health care for the populations it serves. The SLRHC conducts satisfaction surveys with Gateway to Better Health enrollees and healthcare providers on a regular basis.

The Patient Satisfaction Survey uses a sample of convenience and is collected over a three-month period from May through July of each year. Gateway enrollees are asked to complete a survey after their clinic visit at each of the five primary care health centers. The Provider Satisfaction Survey uses a convenience sample of Gateway medical providers and support staff involved in the referral process at the five primary care health centers. During the month of May, an email with a link is sent health center staff inviting them to take an online survey.

As the COVID-19 pandemic struck the St. Louis community, the region's healthcare system transitioned into crisis management mode. Clinics consolidated their locations, triaged the most urgent needs first, and prioritized staff and patient safety in reaction to the many unknown factors of this virus. In order to collect patient data, the demonstration relies upon support staff at each clinic location to disperse and collect survey materials throughout the normal course of patient registration. With uncharacteristic patient volumes, enforcement of additional COVID-19 screening measures, and staffing shortages, it was determined that the collection of this data would place an undue burden upon clinic partners. The SLRHC consulted the demonstration's independent evaluator, Mercer Government (Mercer), and determined that the suspension of survey procedures throughout the pandemic response would be the most sensible course of action. The data collected annually throughout the demonstration has remained consistent over the course of the evaluation period, assuring that the disruption in data collection will not negatively impact the approved evaluation design.

IV. Budget Neutrality and Financial Reporting

Budget Neutrality

The state continues to monitor budget neutrality for Demonstration Year 13 as claims are processed. The budget neutrality worksheet will be provided separately from this monitoring report.

Annual Gateway Program Expenses

The table below documents Gateway Pilot Program expenses in Demonstration Year 13 as compared to the operating budget. An explanation of key variances by provider type is also provided.

In Demonstration Year 13, nearly all Gateway to Better Health members were successfully transitioned to forms of Medicaid coverage, greatly reducing the costs exhibited by the increased enrollment rates presented in Demonstration Years 11 and 12.

Gateway Actual to Operating Budget, October 1, 2021 - September 30, 2022 9

Provider Type	Actual	Operating Budget
Primary Care Providers	\$9,197,799	\$14,125,008
Specialty Care Providers	\$4,351,565	\$8,819,610
Transportation	\$158,579	\$249,119
Gateway Administration	\$3,607,014	\$3,920,365
Total Allowable Gateway Program Expenses	\$17,314,957	\$27,114,102

Gateway primary care providers were paid \$9.1 million from October 1, 2021 to September 30, 2022 (FFY22), or about 65% of the estimated budget. Specialty care providers were paid \$4.3 million, which was 49% of the total specialty care operating budget for the fiscal year. Roughly 64% of the estimated \$249,119 for transportation expenses was utilized across the year. Administrative expenses were on target, with \$3.6 million of the \$3.9 million budget being applied in FFY22.

Cost of Specialty Care Services

The table below reviews specialty care costs in Demonstration Year 13 for Gateway providers based on claims data. Claims are still being submitted for the fourth quarter of Demonstration Year 13. It is anticipated that claims amount for the period may increase as additional claims are filed.

Cost of Specialty Care Services, October 1, 2021 – September 30, 2022 9

Provider Name	Provider Payments
BJC Healthcare	\$1,081,344
Mercy & Affiliates	\$1,990
SLUCare	\$538,532
SSM Health	\$1,009,912
Washington University School of Medicine	\$1,703,550
All Other	\$16,237
TOTAL	\$4,351,565

⁹ Reported information based on data as of October 1, 2022. Additional allowable expenses may be incurred for the federal fiscal year.

Provider Incentive Payments

The Incentive Payment Protocol (provided in Appendix IV) requires seven percent of provider funding to be withheld from Gateway primary care providers. The seven percent withhold is tracked and managed on a monthly basis. The SLRHC is responsible for monitoring the health centers' performance against the pay-for-performance metrics in the Incentive Payment Protocol. Withholds for Gateway providers during Demonstration Year 13 are outlined below:

Summary of Provider Payments and Withholds, October 1, 2021 - September 30, 2022 9

	Provider	Provider Payments		
Providers	Payments ¹⁰	Withheld		
Affinia Healthcare	\$3,785,138	\$256,501		
BJK People's Health Centers	\$1,614,301	\$109,418		
CareSTL Health	\$1,681,907	\$114,003		
Family Care Health Centers	\$930,537	\$63,068		
St. Louis County Department of Public Health	\$1,185,917	\$80,374		
Total	\$9,197,799	\$623,364		

Note: Payments in the table above are subject to change as patient enrollment/eligibility changes. Reported provider payments and withholds are based on data as of October 1, 2022.

Annual pay-for-performance incentive payments are paid out at six-month intervals of the Pilot Program based on performance during the following reporting periods:

- 1) January 1, 2022 June 30, 2022
- 2) July 1, 2022 December 31, 2022

The first pay-for-performance reporting period ended on June 30, 2022. As stated above, the SLRHC and its stakeholders determined that the suspension of the incentive procedures for this performance period was essential to each health center's successful COVID-19 response. As such, the complete results of the returned incentive payment amounts are provided in Appendix V.

Pay-for-performance incentive outcomes for the time period of July 1, 2022 - December 31, 2022, are not yet available but will be shared in future reports.

¹⁰ Amount represents actual payments including incentive payments.

V. Evaluation Activities and Interim Findings

Evaluation findings for Demonstration Year 13 are outlined below, based on the approved evaluation design for the project. As has been stated throughout this report, response to the COVID-19 pandemic has had a substantial impact on data collection measures for the past three years of the demonstration. In some cases, data collection is simply delayed and will be provided in future reports. In others, provider inability to be held fully to established Pay-for-Performance metrics or oversee the collection of beneficiary satisfaction data, has left gaps in the outlined evaluation design. These gaps will be addressed and noted below as the results are shared. Data for calendar year 2022 will be provided in the project's summative report, upon the conclusion of the reporting period.

The following evaluation activities section highlights each data measure associated with the demonstration's hypotheses, as outlined in the approved evaluation design of the Pilot Program:

- I. **Hypothesis 1**: The St. Louis Regional Health Commission Gateway project supports the availability of primary and specialty health care services to uninsured adults in St. Louis City and St. Louis County.
- II. **Hypothesis 2**: Connecting and engaging low-income uninsured individuals to a Gateway primary care home corresponds with sustained or increased primary care utilization.
- III. **Hypothesis 3**: Enhanced provider quality of care corresponds with improved overall health outcomes and reduced health disparities.

Each of these hypotheses is translated into quantifiable targets for improvement so that the performance of the demonstration can be adequately measured. Additionally, each measure has been calculated as described in "Table B. Measure Specifications" of the approved evaluation design. Any irregularities in the calculation methods, primarily due to the COVID-19 pandemic, have been noted below.

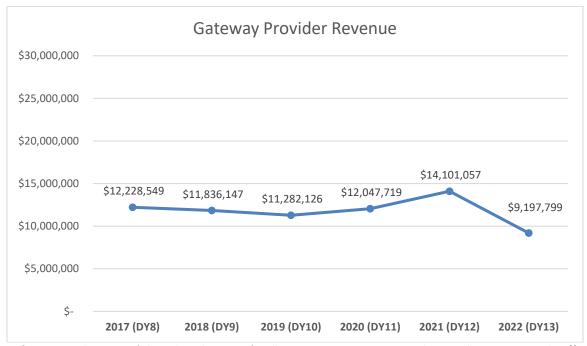
Additionally, the collection period for each metric is noted as either:

- Calendar Year (CY) for data reflective of January 1 to December 31 of the given year or;
- Demonstration Year (DY), which reflects the federal fiscal year (FFY) period of October 1 to September 30.

Hypothesis 1: The St. Louis Regional Health Commission Gateway project supports the availability of primary and specialty health care services to uninsured adults in St. Louis City and St. Louis County.

Research Question: Does the coverage approach to provider reimbursement and incentive payments provide a stable revenue stream?

Claims-based revenue for all primary care services received across all Gateway providers is shown in the table below. Revenue for primary care providers has remained stable across the reporting period and has enabled health center partners to support uninsured adults across the region. We begin to see variance in the data as we enter 2020. This can be attributed to the Missouri Department of Social Services' (DSS) suspension of disenrollment through the end of the Federal Emergency. Increases in enrollment resulted in increased revenue payments due to providers across DY11 and DY12. As expected, when members began to transition to forms of Medicaid coverage in DY13, payments from the Gateway project begin to decrease.



Definition: Total amount of claims-based revenue for all primary care services received across all Gateway providers ¹¹. Reported provider payments and withholds are based on data as of October 1, 2022.

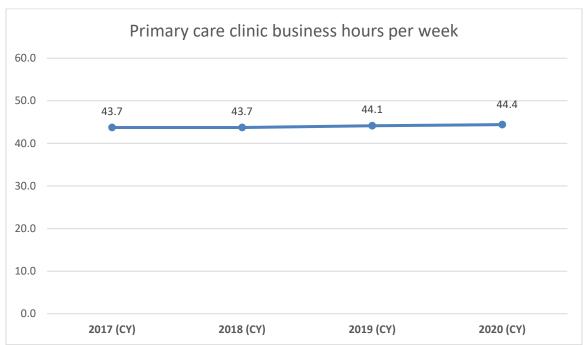
¹¹ Reported revenue based on October 1 to September 30 financial data of each fiscal year. Additional allowable expenses may be incurred for the most recent federal fiscal year.

Hypothesis 1: The St. Louis Regional Health Commission Gateway project supports the availability of primary and specialty health care services to uninsured adults in St. Louis City and St. Louis County.

Research Question: What variance, if any, exists in primary care provider availability and primary care service array across the evaluation period?

Gateway Provider Survey Data that includes core services, clinic hours, and specific wait time data, is collected annually from primary care providers. Data is collected for the prior calendar year (January 1 – December 31) and is typically due to the SLRHC for analysis by July of the current calendar year. Templates used to collect data can be found in the approved evaluation design under "Attachment A. Gateway Provider Survey Templates". COVID-19 has impacted clinic response time for these reporting requirements. Data collection for 2020 (CY) has concluded, while collection for 2021 (CY) and 2022 (CY) has been delayed due to the pandemic response. During analysis of provider survey data for the DY13 annual report, it was noted that the number of total clinics decreased from 17 to 16 sometime between reporting in 2019 and 2022. This report assumes that the clinic closed in 2020, and impact on any metrics from this assumption are footnoted. Any gaps in data collection will be noted below.

As is shown in the following three charts, provider availability has remained relatively consistent across the reporting period for available data.

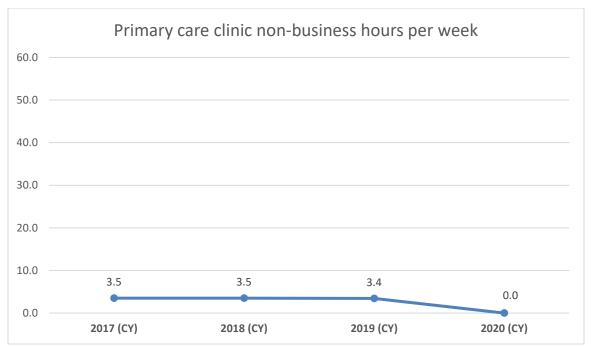


Definition: Sum of open clinic hours between 8:00 a.m. and 5:00 p.m. Monday-Friday across the total number of clinic locations across all Gateway primary care providers ^{12,13}

¹² Metric is based on self-reported Gateway Provider Survey data collected in July of each calendar year. COVID-19 has impacted clinic response time for these reporting requirements. Data collection for 2020 (CY) has concluded, while collection for 2021 (CY) and 2022 (CY) has been delayed due to the pandemic response.

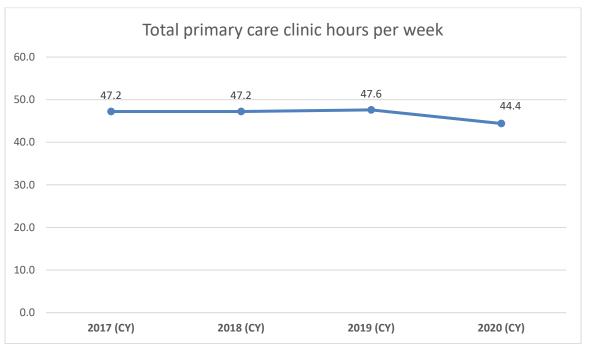
¹³ Due to clinic consolidation across providers, the number of clinics is n=18 in 2017 and 2018, n=17 in 2019. There were 16

One COVID-19 impact that is evident across the reporting period is changes in available non-business hours per week. This service is defined as clinic hours outside of 8:00 a.m. to 5:00 p.m. from Monday – Friday. In 2019, three primary care partners provided the majority of access to care outside regular business hours, Family Care Health Centers, Betty Jean Kerr People's Health Centers, and Affinia Healthcare. Family Care Health Centers cut these services in calendar year 2020. This change was noted as a necessary action to reallocate resources toward the pandemic response. Betty Jean Kerr People's Health Centers also cut these services. Affinia Healthcare retained, but slightly reduced, their availability across non-business hours. However, self-reported clinic hours from People's Health Centers and Affinia were not available at the time of this annual report and are therefore excluded from the calculated metrics. The below chart illustrates this reduction on average across all primary care partners. Reinstatement of these services has not yet been demonstrated and may be a permanent side effect of the safety network's pandemic response.



Definition: Sum of open clinic hours before 8:00 a.m. and after 5:00 p.m. Monday – Friday across the total number of clinic locations across all Gateway primary care providers ^{12, 13}

While primary care clinic business hours remain unchanged, the decrease in non-business hour access resulted in a slight decrease in total primary care access availability when averaged across providers. This is demonstrated in the chart below.



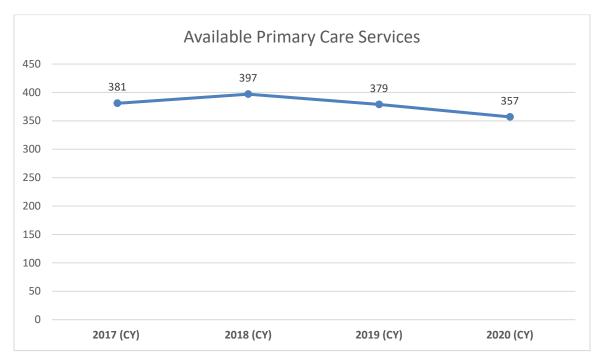
Definition: Sum of open clinic business and non-business hours across the total number of clinic locations across all Gateway providers ^{12, 13}

Available Primary Core and Additional Services are also self-reported by clinic partners annually via the Gateway Provider Survey. Each provider stipulates which of the primary care service offerings is available at their individual clinic locations. Provider service array is included below.

Primary Care Provider Network Service Array

Core Services Core Services	Additional Services
Primary Medical Care	Nutrition
Clinical Laboratory Services (please indicate whether in-house or	Youth Behavioral Health Services (please specify types of
contracted)	services available)
Mental Health Services (please specify types of services available)	WIC
Substance Abuse Services (please specify types of services available)	Community Health Homeless Services
Podiatry	Prenatal classes/Centering Pregnancy
Optometry	HIV Counseling
Enabling Services	Urgent Care
Pharmacy	Specialty Care (please specify specialties available)
Chronic Disease Management	STD Clinic Services
Ophthalmology	Social Services
Case Management	Other not listed (please specify)
Social Services	
Referral to Specialty Care	
Eligibility Assistance Services	
Radiology	
Dental Care	

Available primary care services have remained consistent across the reporting period, however the reduction in clinic sites where Gateway members can access those services has resulted in the slight decrease across the reporting period demonstrated below.



Definition: Total number of core and additional primary care services provided across Gateway to Better Health clinics. 2021 Gateway Provider Survey data has not yet been submitted by providers due to COVID-19. ^{12, 14}

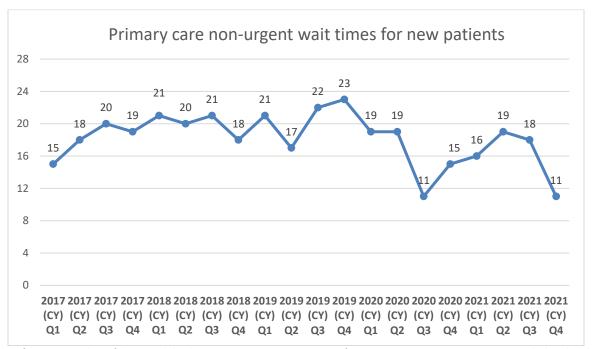
Hypothesis 1: The St. Louis Regional Health Commission Gateway project supports the availability of primary and specialty health care services to uninsured adults in St. Louis City and St. Louis County.

Research Question: What variance, if any, exists in access to primary and specialty care across the evaluation period?

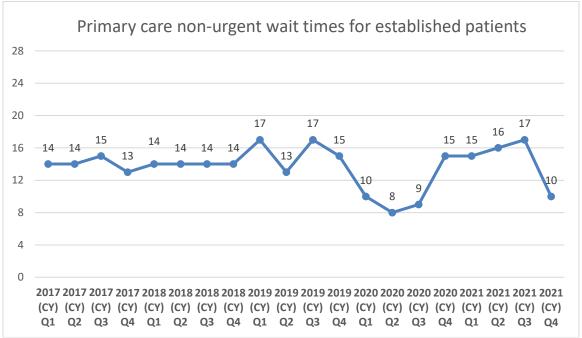
The following tables outline non-urgent wait times for new and established patients for primary care services on a quarterly basis. Wait times are reported at the close of each quarter for Gateway to Better Health patients at each primary care provider. For new patients, the longest wait time was approximately three weeks across the reporting period. For established patients, the longest wait time was closer to two weeks. Additionally, urgent wait times are provided on an annual basis via the Gateway Provider Survey Data process outlined above, with wait times averaging approximately one to two weeks for new patients, and less than a week for established patients.

Wait times remained relatively consistent across the reporting period. The largest variances year over year are seen in calendar year 2020 and 2021, due to COVID-19 adjustments in care.

¹⁴ This chart includes an estimated 169 available primary care services in 2020 from 7 clinics with two providers, BJK People's and Affinia, based on the 2019 data from the Gateway Provider Survey. The self-reported 2020 data on primary care services from these two providers was unavailable at the time of annual reporting. Excluding these 7 clinics, the remaining 9 clinics had 188 primary care services in 2020.

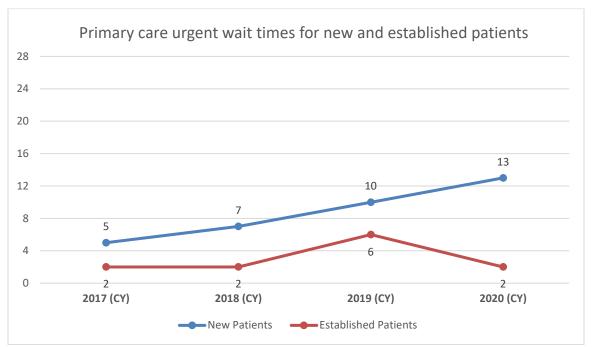


Definition: Number of days until third next non-urgent appointment for new patients. Wait times are provided at the close of each quarter by primary care providers. Data includes wait time averages across clinics for both non-urgent dental and non-urgent primary care visits ^{8, 15}



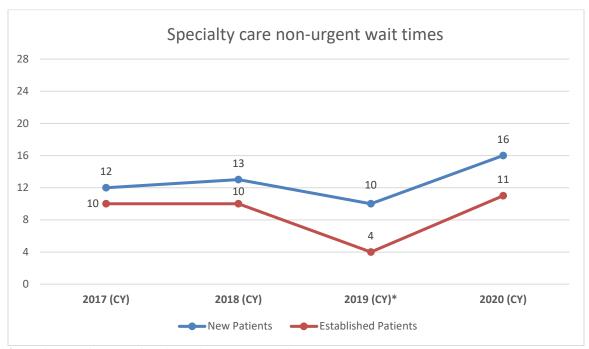
Definition: Average number of days until third next non-urgent appointment for established patients. Wait times are provided at the close of each quarter by primary care providers. Data includes wait time averages across clinics for both non-urgent dental and non-urgent primary care visits 8, 15

¹⁵ Due to clinic consolidation across providers, the number of clinics is n=18 in 2017 and 2018, n=17 in 2019, and n=16 in 2020 and 2021 for primary care wait times. For 2020, non-urgent wait times were revised from DY12 Annual report to reflect n=16 clinics instead of n=17.



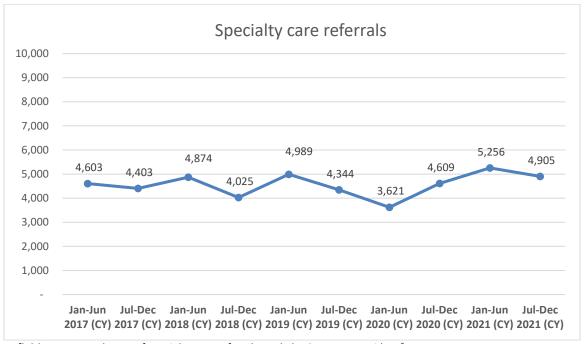
Definition: Number of days until next urgent appointment for new and established patients. Urgent wait times are provided on an annual basis (separately from quarterly primary care non-urgent wait times) via Gateway Provider Survey Data. As noted above, Provider Survey data has not yet been collected for 2021 (CY) or 2022 (CY) due to COVID-19. As such, data around urgent wait times exist only through 2020 (CY). ^{12,15}

Additionally, specialty care wait times and referrals are closely monitored to ensure patients receive the additional medical care not available to members within a primary care setting. Specialty care non-urgent wait time data is collected annually via the Gateway Provider Survey data process. Due to COVID-19, response rates providing specialty care wait times for Calendar Year 2019 data were uncharacteristically low. Referral data is tracked and reported monthly via the demonstration's call center, Automated Health Systems (AHS). Little variance exists for non-urgent wait times year over year. Patients, on average, were able to see a specialist provider within approximately two weeks across each service year. Specialty referrals remained consistent as well.



*2019 data may be incomplete due to the COVID-19 pandemic

Definition: Number of days until third next specialty care non-urgent appointment for new and established patients. Specialty care non-urgent wait times are provided on an annual basis (separately from quarterly primary care non-urgent wait times) via Gateway Provider Survey Data. As noted above, Provider Survey data has not yet been collected for 2021 (CY) or 2022 (CY) due to COVID-19. As such, data around urgent wait times exists only through 2020 (CY). ¹²

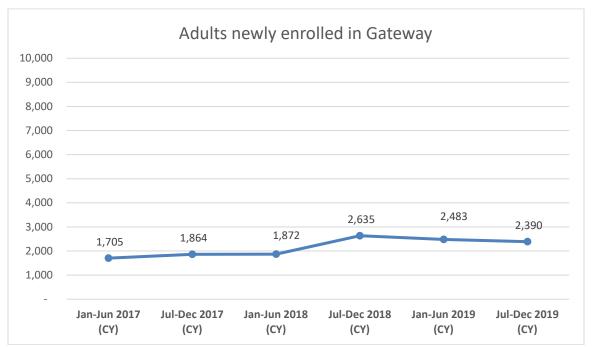


Definition: Reported rates of specialty care referrals made by Gateway providers ⁶

Hypothesis 2: Connecting and engaging uninsured individuals to a Gateway primary care home corresponds with sustained or increased primary care utilization.

Research Question: Have uninsured adults in St. Louis City and St. Louis County connected to a primary care home?

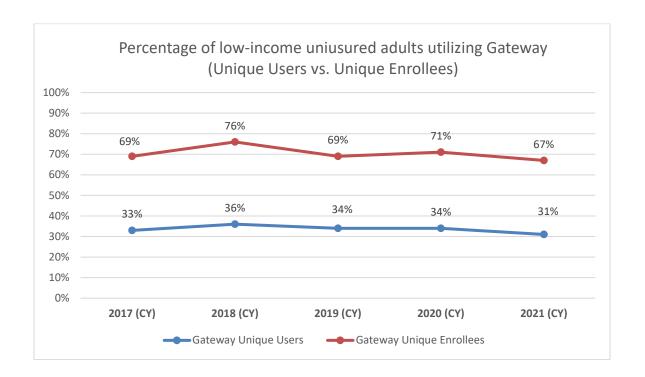
The demonstration enrolled between 3,500 and 4,800 new patients into the project annually for calendar years 2017 -2019. This data is secured through electronic heath record (EHR) data and self-reported information provided by the health centers as part of the Pay-for-Performance metrics established for the program. Incentive protocols have been suspended since January 1, 2020, to allow providers to focus solely on providing care amid the COVID-19 emergency response.



Definition: Total number of low-income uninsured adults newly enrolled in Gateway program in one year based on Pay-for-Performance metrics 16

Based on United States Census Data for the region, the Gateway to Better Health project provided a medical service to 31% to 36% of St. Louis City and County residents estimated to be eligible for the program across the service period. Meanwhile, 67% to 76% of eligible residents were enrolled into the demonstration across the same period. ^{17, 18} This highlights that outreach efforts to connect with eligible patients are successful. Furthermore, over a third of low-income patients across the region are utilizing the demonstration as a means to access their medical care. Penetration rates for both metrics remained consistent over the past five years of the demonstration, as shown in the chart below.

¹⁶ This data is secured through electronic health record (EHR) data and self-reported information provided by the health centers as part of the Pay-for-Performance metrics established for the program. Incentive protocols have been suspended since January 1, 2020, to allow providers to focus solely on providing care amid the COVID-19 emergency response.



Definition: Graph demonstrates the percentage of eligible ¹⁷ uninsured adults that received a service (Gateway unique users) across the Calendar Year (January 1 – December 31), compared with the percentage of eligible ¹⁷ uninsured adults that were enrolled (Gateway unique enrollees) across the Calendar Year (January 1 – December 31). Reported utilization based on Gateway claims data as of November 23, 2022 ¹⁸

Hypothesis 2: Connecting and engaging uninsured individuals to a Gateway primary care home corresponds with sustained or increased primary care utilization.

Research Question: Has Gateway enrollment reduced the perception of barriers to primary and specialty care for enrollees and providers? ¹⁹

On an annual basis, patients are surveyed to endorse their level of confidence that if the Gateway program ended, they could continue to access necessary health care.

¹⁷ Eligibility is determined as uninsured adults between the ages of 19-64, with incomes less than 100% of the Federal Poverty limit, living across the demonstration's service region of St. Louis City and County.

¹⁸ Enrollment numbers are based on MO HealthNet enrollment data as of October 1, 2022. United States Census data is accurate as of November 30, 2022.

¹⁹ As noted in the Performance Metrics section above, the annual Beneficiary Survey for patients and providers was withdrawn this year to allow providers to focus solely on providing care amid the COVID-19 emergency response. Survey data from the collection period of 2020 -2022 will not be available.

If the Gateway program ended, how confident are you that you could:

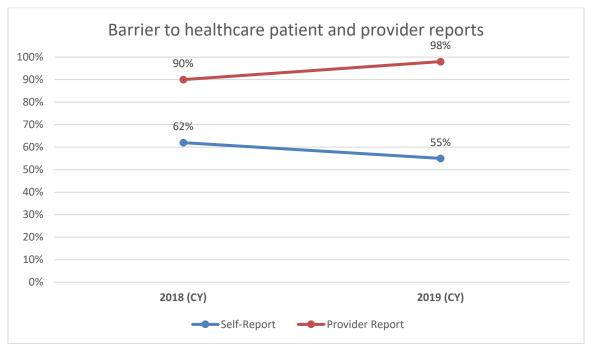
- I. Afford to see a doctor?
- II. Afford prescription medicines?
- III. Coordinate all of your health care needs?
- IV. Get necessary medical tests?
- V. Follow the treatments your doctor recommends?

Over 55% of patients across the reporting period endorsed that were not confident they could continue to access appropriate medical care.

In the same vein, providers are asked to endorse their level of confidence that if the Gateway program ended their patients could still access care and maintain their health. If the Gateway program ended, could your patients:

- I. Keep their overall health the same?
- II. Access quality medical care?
- III. Afford to see a primary care provider?
- IV. Afford prescription medicines?
- V. Afford to see a specialist doctor?

Resoundingly, over 90% of providers across both survey periods indicated that they were not confident patient care could continue at the level established by the demonstration project.



Definition: Percentage of enrollees and providers who report barriers to healthcare without Gateway program. This metric was added to the annual survey in the collection period of May – July 2018. As such, only two years of data are available. ¹⁹

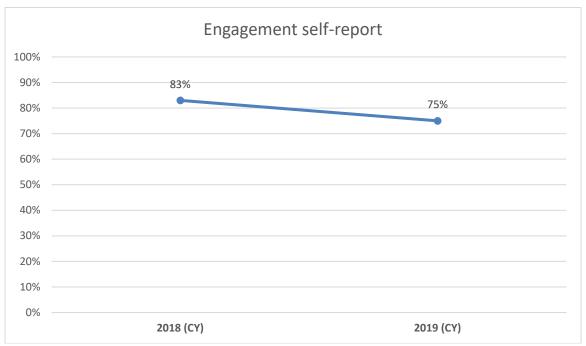
Hypothesis 2: Connecting and engaging uninsured individuals to a Gateway primary care home corresponds with sustained or increased primary care utilization.

Research Question: Have Gateway members been engaged by their primary care with member education, outreach, and follow-up?

On an annual basis, patients are asked to endorse their satisfaction with their health center's communication and care on the following communication items:

- I. How promptly we answer your phone calls.
- II. Information from our website and other materials to help you get the healthcare you need.
- III. Getting advice or help from the clinic when needed during office hours.
- IV. Helpfulness of our health information materials.

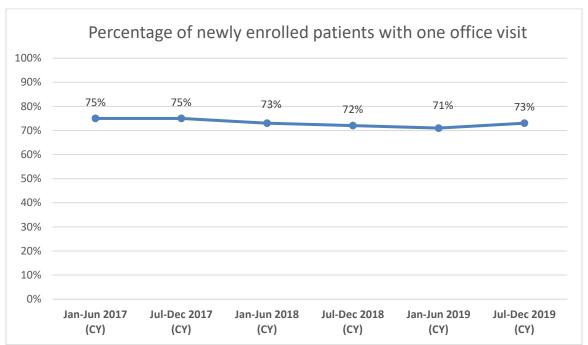
Year over year, patients report high rates of satisfaction with their health center's helpfulness and communication.



Definition: Percentage of Gateway enrollees who report timely information and help from their provider. This metric was added to the annual survey in the collection period of May – July 2018. As such, only two years of data are available. ¹⁹

The SLRHC also tracks new members coming into the Gateway program and whether these individuals are engaging with their primary care providers by having an office visit within one year of enrolling. This metric is included in each center's pay-for-performance incentive payments to ensure excellent care.

Throughout the reporting period, 71% to 75% of patients have been connected with a new patient visit during their first year of enrollment. This result has remained steady.

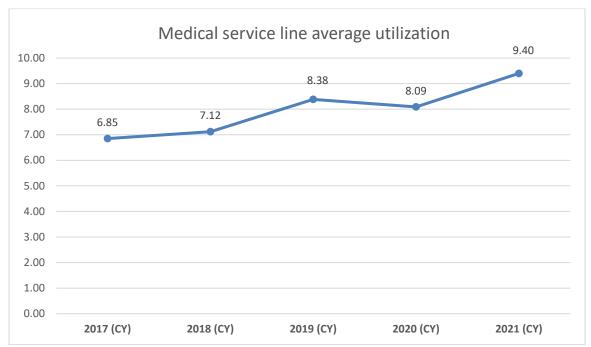


Definition: Percentage of newly enrolled Gateway members who receive at least one office visit within the demonstration year based on Pay-for-Performance metrics. Pay-for-Performance metrics have been suspended since January 1, 2020 due to COVID-19 ¹⁶

Hypothesis 2: Connecting and engaging uninsured individuals to a Gateway primary care home corresponds with sustained or increased primary care utilization.

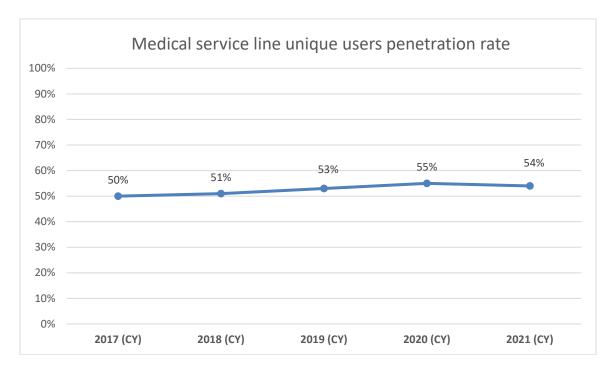
Research Question: Do Gateway enrollees connected to a primary care home demonstrate sustained or increased utilization of outpatient medical services year to year?

Gateway claims data reveals a sustained level of utilization across the service period when examining the number of medical encounters across a given calendar year by unique members. Across the reporting period, the average number of visits per unique user in a given calendar year has increased from approximately seven visits to nine.



Definition: Average number of office visits per unique user across the given calendar year 20

We also see a steady rate, between 50% to 55%, of Gateway members accessing care at their primary care health home across the given calendar year. There was a slight decrease in 2021 from 2020.



Definition: Percentage of Gateway enrollees who receive services across the medical service line out of those enrolled for the given calendar year ²⁰

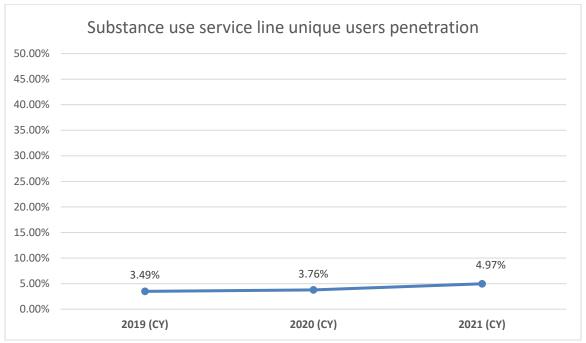
²⁰ Reported utilization based on Gateway claims data as of November 23, 2022.

Hypothesis 2: Connecting and engaging uninsured individuals to a Gateway primary care home corresponds with sustained or increased primary care utilization.

Research Question: Do Gateway enrollees connected to a primary care home demonstrate sustained or increased utilization of outpatient substance use services year to year?

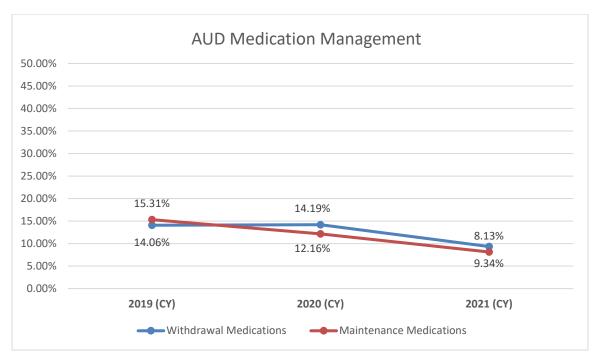
In August 2018, the state requested authority to amend the Gateway demonstration to include a substance use treatment benefit. This request was approved by CMS with a February 1, 2019, implementation date. This additional benefit covers outpatient substance use services, including pharmacotherapy, for treatment of Gateway enrollees with an SUD-related diagnosis. All office visits and generic pharmaceuticals are provided by the primary care home and are considered a core primary care service.

The benefit became accessible to Gateway providers and members February 1, 2019, for a reduced timeframe of only eleven months out of the 2019 calendar year. Since the benefit's inception, approximately 3% to 5% of total Gateway enrollees have utilized treatment per year, with the rate of utilization slightly increasing each year the benefit has been available.



Definition: Percentage of Gateway enrollees who receive services under the substance use medical service line across each calendar year (February 1, 2019 – December 31, 2019) and (January 1 - December 31 of 2020 and 2021) ²⁰

Approximately 8 - 14% of enrollees with an Alcohol Use Disorder (AUD) diagnosis were prescribed medication to manage alcohol withdrawal symptoms, while approximately 9 - 15% of enrollees with an AUD diagnosis were prescribed maintenance medication to support alcohol use treatment. Those prescribed a medication to manage an AUD diagnosis has been slightly on a decline year over year.



Definition: Graph demonstrates the percentage of Gateway enrollees with an Alcohol Use Disorder (AUD) diagnosis that are prescribed at least one medication to manage withdrawal from alcohol (withdrawal medications), against the percentage of Gateway enrollees with an AUD diagnosis that are prescribed Disulfiram or Naltrexone HCL (maintenance medications) across the given calendar year ^{20, 21}

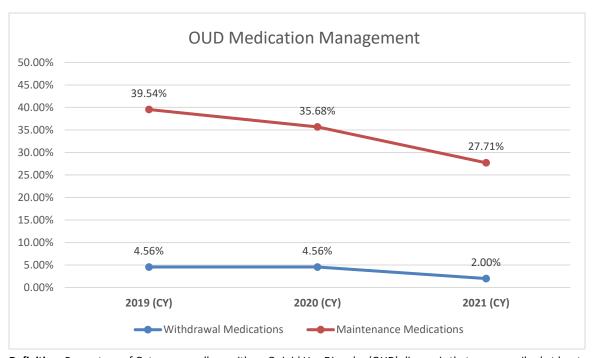
As the SUD benefit launched in February 2019, The Missouri Opioid State Targeted Response and State Opioid Response (Opioid STR and SOR) project, overseen by the State of Missouri Department of Mental Health (DMH) and University of Missouri, St. Louis - Missouri Institute of Mental Health (UMSL-MIMH), approached the Gateway Pilot Program Planning Team with an opportunity for partnership aimed at collaboratively, effectively, and efficiently caring for those across the St. Louis region seeking substance use disorder treatment. The primary focus of the Opioid STR/SOR project is multidisciplinary provider training and education on Medication-Assisted Treatment (MAT) and the provision of evidence-based treatment services to uninsured individuals with opioid use disorder (OUD) that present for care within state-funded programs (Comprehensive Substance Treatment and Rehabilitation Programs - CSTARs). As patients enroll in treatment under CSTAR programs, the first step is overseeing individuals' safe and medication-assisted withdrawal from opiate drugs. From there, the Gateway SUD benefit becomes an option, providing eligible uninsured adults the opportunity to enroll in the Gateway program and seek ongoing SUD treatment across one of Gateway's five partner clinics. In addition to the oversight of successful referrals between CSTARs and the Gateway program, the STR/SOR team provided rigorous

²¹ Baclofen, Desipramine HCL, Mirtazapine, Paroxetine CR, Paroxetine ER, Paroxetine HCL, and Gabapentin.

training to Gateway's primary care physicians on the proper management of Medication-Assisted Treatment (MAT) for OUD patients.

Since the implementation of the SUD benefit, Gateway primary care providers continue to collaborate with the STR/SOR team, allowing the CSTARs to focus on the earlier and more intensive phase of withdrawal treatment, and Gateway primary care providers to undertake the maintenance SUD treatment phase. While withdrawal medication is still available to those wishing to receive initial treatment at their community health center, more Gateway patients are accessing maintenance medications via the Gateway program, as is evident in the following OUD graph. This concerted partnership ensures patients receive closed-loop care, with greater opportunity for successful recovery.

Approximately 2 - 5% of enrollees with an OUD diagnosis were prescribed medication to manage withdrawal symptoms from opioids, while approximately 27 - 40% of enrollees with an OUD diagnosis were prescribed maintenance medication to support opioid use treatment under the Medication-Assisted Treatment model (MAT) year over year.



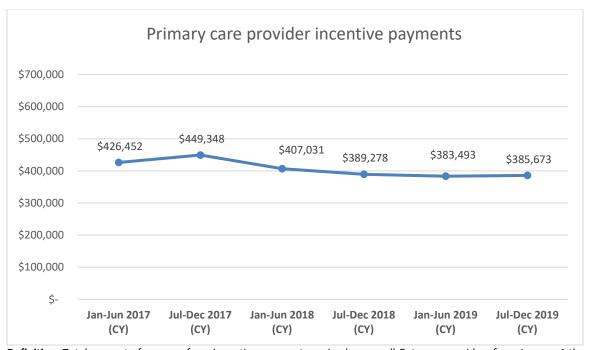
Definition: Percentage of Gateway enrollees with an Opioid Use Disorder (OUD) diagnosis that are prescribed at least one medication to manage withdrawal from opioids (withdrawal medications), against the percentage of Gateway enrollees with an OUD diagnosis that are prescribed Buprenorphine HCl or Naltrexone HCL (maintenance medications) across the given calendar year ^{20,22}

²² Baclofen, Desipramine HCL, Mirtazapine, Paroxetine CR, Paroxetine ER, and Paroxetine HCL.

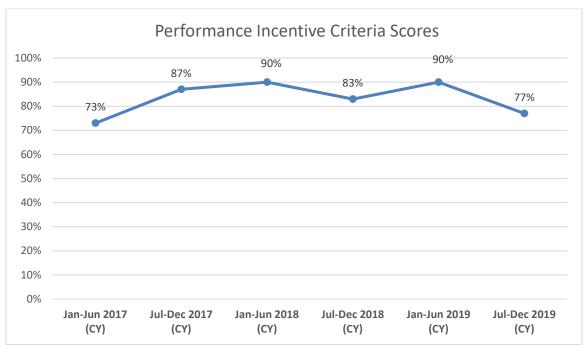
Hypothesis 3: Enhanced provider quality of care corresponds with improved overall health outcomes and reduced health disparities.

Research Question: Does using value-based purchasing for provider reimbursement correspond with providers meeting incentive criteria on health and quality of care indicators?

Community health centers continue to perform well across pay-for-performance criteria and earn incentive payments throughout the demonstration. These rates of payment have remained consistent over the reporting period and are outlined below.



Definition: Total amount of revenue from incentive payment received across all Gateway providers from January 1 through December 31. Pay-for-Performance metrics have been suspended since January 1, 2020^{16}



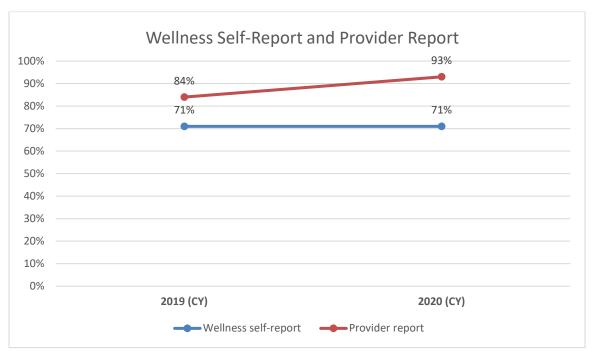
Definition: Percentage of Pay-For-Performance (P4P) criteria benchmarks met across each reporting period. Pay-for-Performance metrics have been suspended since January 1, 2020 ¹⁶

Hypothesis 3: Enhanced provider quality of care corresponds with improved overall health outcomes and reduced health disparities.

Research Question: Do uninsured Gateway members have perceived improved health outcomes?

On an annual basis, patients are surveyed to endorse whether their overall physical health is better, worse, or the same. Each year, 71% of patients endorsed that their overall health had improved due to enrollment in Gateway to Better Health and access to health care via their primary care health homes.

Providers are also surveyed annually to endorse whether they believe the overall physical health of their patients has improved, worsened, or stayed the same. Overwhelmingly, providers endorse that Gateway to Better Health has a positive impact on patient health.



Definition: Percentage of Gateway enrollees and providers who report improved patient health. This metric was added to the annual survey in the collection period of May – July 2018. As such, only two years of data are available. ¹⁹

Hypothesis 3: Enhanced provider quality of care corresponds with improved overall health outcomes and reduced health disparities.

Research Question: Do uninsured Gateway members have improved health outcomes year over year? And, when health indicators are calculated separately by race, do enrollees exhibit statistically significant differences?

The SLRHC partners with the Missouri Primary Care Association (MPCA) to obtain information from the demonstration's five primary care health partners on a set of indicators that are collected at a statewide level. The metrics indicated are found to demonstrate population-level health and support both preventative care and chronic disease improvement for the region. This data was outlined and analyzed in the demonstration's interim report. This analysis will be further expanded upon in the project's summative report.

APPENDIX I: Quarter IV Results

State of Missouri Gateway to Better Health Demonstration 11-W-00250/7 Section 1115 Quarterly Report

Demonstration Year: 13 (October 1, 2021 – September 30, 2022) Federal Fiscal Quarter: 4/2022 (July 1, 2022 – September 30, 2022)

Introduction:

The current funding provided by this demonstration project builds on and maintains the success of the "St. Louis Model," which was first implemented through the "Health Care for the Indigent of St. Louis" amendment to the Medicaid Section 1115 Demonstration Project. This amendment authorized the diversion of 6.27 percent of the Statewide DSH cash distributions, previously allocated to St. Louis Regional Hospital, to a "St. Louis Safety Net Funding Pool," which funded primary and specialty care for the uninsured. The downsizing and ultimate closure of St. Louis Regional Hospital in 1997 led to the "St. Louis Model."

On July 28, 2010, CMS approved the State of Missouri's "Gateway to Better Health" demonstration, which built upon the "St. Louis Model" to preserve access to ambulatory care for low-income, uninsured individuals in St. Louis City and County. The July 1, 2012, implementation of the Pilot Program ensured patients of the St. Louis safety net population maintained access to primary and specialty care. CMS approved one-year extensions of the demonstration on September 27, 2013, July 16, 2014, December 11, 2015, June 16, 2016, and again on September 1, 2017, for a five-year extension. In February 2015, the State of Missouri, Department of Social Services (DSS), requested authority to amend the Gateway program to provide coverage for brand name insulin and asthma inhalers where a generic alternative was otherwise unavailable. This request was approved with an implementation date of January 1, 2016. In August 2018, the State of Missouri requested authority to amend the demonstration to include a substance use treatment benefit. The amendment request was approved with an implementation date of February 1, 2019, to cover outpatient substance use services in the primary care home, including pharmacotherapy, for Substance Use Disorder (SUD) treatment of Gateway enrollees. In October 2019, DSS requested authority to further amend the Gateway program to include a physical function improvement benefit. The amendment request was approved in October 2020, with an implementation date of January 1, 2021, to cover office visits for physical therapy, occupational therapy, chiropractic, and acupuncture services for Gateway enrollees with pain-related diagnoses. All physical function services are to be provided by the primary care home and are considered a core primary care service. The state has been authorized to spend up to \$30 million (total computable) annually to preserve and improve primary and specialty care in St. Louis, in lieu of spending that amount of statutorily authorized funding on payments to disproportionate share hospitals (DSHs). This demonstration includes the following main objectives:

- I. Preserve and strengthen the St. Louis City and St. Louis County safety net of health care providers available to serve the uninsured.
- II. Connect the uninsured to a primary care home which will enhance coordination, quality, and efficiency of health care through patient and provider involvement.
- III. Maintain and enhance quality service delivery strategies to reduce health disparities.

For the first two years of the demonstration, through June 30, 2012, certain providers referred to as Affiliation Partners were paid directly for uncompensated care. These providers included St. Louis ConnectCare, Affinia Healthcare, and CareSTL Health. The program transitioned to a coverage model pilot on July 1, 2012.

From July 1, 2012 to December 31, 2013, the Pilot Program provided primary, urgent, and specialty care coverage to uninsured adults in St. Louis City and St. Louis County, aged 19-64, who were below 133% of the Federal Poverty Level (FPL). The demonstration was scheduled to expire December 31, 2013. On September 27, 2013, July 16, 2014, December 11, 2015, and June 16, 2016, CMS approved one-year extensions of the Gateway demonstration program for patients up to 100% FPL. On September 1, 2017, CMS approved a five-year extension of the demonstration program.

The primary goal of the Gateway to Better Health Pilot Program is to provide a bridge for safety net providers and their uninsured patients in St. Louis City and St. Louis County until coverage options become available through federal health care reform. In 2017, CMS approved a five-year extension of the demonstration program, or until Missouri Medicaid eligibility is expanded to include the waiver population. In August 2020, Missouri voters approved to expand MO HealthNet (Missouri Medicaid) benefits to adults aged 19-64 who meet certain income guidelines, thereby providing Medicaid benefits to St. Louis City and St. Louis County residents that are currently receiving Gateway to Better Health via the newly established Adult Expansion Group Medicaid category. The Gateway to Better Health Program will end after MO HealthNet benefits are explored for all current Gateway members, and once the continuous enrollment requirements established under the Public Health Emergency (PHE), end in the state. The review process for Gateway members began October 1, 2021.

Under the demonstration, the state has authority to claim as administrative costs limited amounts incurred for the functions related to the design and implementation of the demonstration pursuant to a Memorandum of Understanding (MOU) with the St. Louis Regional Health Commission (SLRHC). The SLRHC, formed in 2001, is a nonprofit, non-governmental organization whose mission is to increase access to health care for people who are medically uninsured and underinsured; reduce health disparities among populations in St. Louis City and County; and improve health outcomes among populations in St. Louis City and County, especially among those most at risk.

In order to meet the requirements for the demonstration project, DSS asked the SLRHC to lead planning efforts to determine the Pilot Program design, subject to CMS review and approval, and to incorporate community input into the planning process. Accordingly, on July 21, 2010, the SLRHC approved the creation of a "Pilot Program Planning Team." (A full roster of the Pilot Program Planning Team can be found in Appendix III). The MO HealthNet Division of the Missouri Department of Social Services is represented on the Planning Team to ensure the SLRHC and MO HealthNet are working

closely to fulfill the milestones of the demonstration project and develop deliverables.

The information provided below details Pilot Program process outcomes and key developments for the fourth quarter of Demonstration Year 13 (July 1, 2022 – September 30, 2022).

Enrollment Information:

As of October 1, 2022, 975 unique individuals were enrolled in Gateway to Better Health. The demonstration's enrollment target, established to preserve budget neutrality for the project, is to maintain an average of 16,000 member months across the given fiscal year. There were no program wait lists during this quarter of the Pilot Program.

The Gateway to Better Health application became obsolete as of October 1, 2021. At that time, uninsured individuals that would typically qualify for Gateway services were encouraged to complete an application for MO HealthNet coverage. Applicants that are deemed ineligible for Medicaid coverage, but eligible for benefits under Gateway to Better Health, can still be processed for enrollment into the demonstration program by the Missouri Department of Social Services Family Support Division (FSD). However, direct Gateway applications are no longer a mechanism for this review process, as most individuals will qualify for expansion coverage and should be screened for enrollment through a Medicaid application. As of June 2022, FSD began reviewing Gateway members that have not returned review forms or submitted a full Medicaid application, using income information available to the state. Transitioning these members from the Gateway program to Medicaid coverage in good faith of eligibility, ensures continuity of care for these members in anticipation of comprehensive eligibility reviews that will take place at the close of the PHE.

DSS continued its suspension of Gateway to Better Health disenrollment this quarter as outlined in the Families First Coronavirus Response Act and will continue to defer any disenrollment until the conclusion of the Federal Emergency or until the expiration of the Gateway to Better Health waiver, whichever comes first. This suspension initially resulted in an increase in the number of Gateway enrolled members over the course of the past two Demonstration Years. However, as the review process for Gateway members' Medicaid eligibility continues, the demonstration project experienced an average monthly loss of 1,666 members across the quarter. The majority of Gateway members enrolled at the beginning of the current fiscal year have successfully transitioned to full insurance coverage under Medicaid. The demonstration is on target to successfully transition all members to some form of Medicaid coverage by December 31, 2022.

Table 1. Gateway to Better Health Pilot Program Enrollment by Health Center*

Health Center	Unique Individuals Enrolled as of October 1, 2022	Enrollment Months July – September 2022		
BJK People's Health Centers	174	1,224		
Family Care Health Centers	86	673		
Affinia Healthcare	392	2,735		
CareSTL Health	186	1,320		
St. Louis County Dept. of Health	137	907		
Total	975	6,859		

^{*}Enrollment numbers are based on MO HealthNet enrollment data as of October 1, 2022.

Outreach/Innovation Activities:

Each month the SLRHC shares information and gathers input about the demonstration from its 20-member board, 30-member Community and Provider Services Advisory boards, and 15-member Patient Advisory board. Full rosters of these boards may be found at www.stlrhc.org.

The SLRHC shares monthly financial, enrollment, and customer service reports about the Pilot Program with these advisory boards in addition to the Pilot Program Planning Team and the committees that report to this team; these committees include the Operations and Finance subcommittees. Members of the community, health center leadership, health center medical staff, and representatives from other medical providers in the St. Louis region are represented on these committees. Full rosters can be found in Appendix III of this report. The SLRHC was able to hold regularly scheduled virtual meetings for its public Advisory Boards to gather input around the Demonstration.

Public meetings held virtually during the fourth quarter are listed below:

Team	Meeting Date
Provider Services Advisory Board Meeting	August 2, 2022
Community Advisory Board Meeting	August 16, 2022
SLRHC Commission Meeting	August 17, 2022
Patient Advisory Board Meeting	August 22, 2022
Provider Services Advisory Board Meeting	September 6, 2022
Community Advisory Board Meeting	September 20, 2022
SLRHC Commission Meeting	September 21, 2022
Patient Advisory Board Meeting	September 26, 2022

This quarter, the SLRHC partnered closely with its advisory boards to keep them well-informed of changes in coverage. Gateway providers are reminded to continue operations as normal as the Medicaid expansion process is carried out. Providers are also encouraged to connect Gateway patients with education and assistance on the Medicaid enrollment process as individuals visit their clinics.

The SLRHC also continues to work alongside regional health care advocates to educate the community on expanded Medicaid benefits. Legal Services of Eastern Missouri (LSEM), Saint Louis University (SLU) School of Law Center for Health Law Studies, and the SLRHC continued to staff a Medicaid Expansion HelpLine throughout the quarter, overseen by trained volunteers primarily from the SLU school of law, to answer the public's questions on Medicaid expansion changes and to help individuals complete applications over the phone. This partnership expanded to a community-wide educational campaign called CoverSTL (www.CoverSTL.org). Housed on the SLRHC's website, the campaign includes information on how to reach the Medicaid Expansion HelpLine, a step-by-step video on how to complete an application at home, a map directing the community to in-person application assistors across the region, and a resource library detailing how to utilize Medicaid coverage once secured.

Operational/Policy Development/Issues:

As noted above, DSS suspended Medicaid disenrollment through the end of the Federal Emergency as outlined in the Families First Coronavirus Response Act. This also resulted in a disenrollment suspension for the Gateway to Better Health demonstration, as eligibility and enrollment in the program is determined by DSS. This pause in disenrollment continued throughout the entirety of the fourth quarter of the federal fiscal year and ensures that continuity of care remains stable for Gateway patients throughout the public health crisis.

Gateway providers continue to operate throughout the COVID-19 pandemic. However, providers report multiple barriers as they work to sustain normal operations, and balance community needs around COVID-19 testing and vaccination as infection rates vacillate. Providers described staffing shortages due to COVID-19 and gaps in the available health care workforce, particularly around primary care dental services. These staffing shortages have been a continuous issue for Gateway to Better Health providers throughout the pandemic response. These issues continued throughout the current fiscal quarter and are reflective of reported patient wait times shared in future sections of this report.

Financial/Budget Neutrality Development/Issues:

The state continues to monitor budget neutrality for this quarter as claims are processed.

Consumer Issues:

Individuals enrolled in the Gateway to Better Health Pilot Program have access to a call center, available Monday through Friday, 8:00AM to 5:00PM central standard time. When the call center is not open, callers may leave messages that are returned the next business day.

From July 1, 2022 – September 30, 2022, the call center answered 540 calls, averaging approximately 8 calls per business day. Of calls answered during this time, no calls resulted in a consumer complaint.

Action Plans for Addressing Any Policy, Administration, or Budget Issues Identified:

There are no policy, administrative, or budget issues to report this quarter.

Quality Assurance/Monitoring Activity:

The state and SLRHC are continually monitoring the performance of the program to ensure it is providing access to quality health care for the population it serves. Representatives from the provider organizations meet regularly to evaluate clinical, consumer, and financial issues related to the program.

Routinely, the state and SLRHC monitor call center performance, access to medical referrals (including referrals for diagnostic care, specialty care, and surgical procedures), and wait times for medical appointments. Recent available outcomes for these measures are detailed in the sections below:

<u>Call Center Performance</u>

Table 3. Call Center Performance, July 1, 2022 – September 30, 2022*

Performance Measure	Outcome
Calls received	545
Calls answered	540
Average abandonment rate	0.88%
Average answer speed (seconds)	2
Average length of time per call (minutes: seconds)	4:42

^{*}Call center performance metrics are based on Automated Health Systems data as of November 4, 2022.

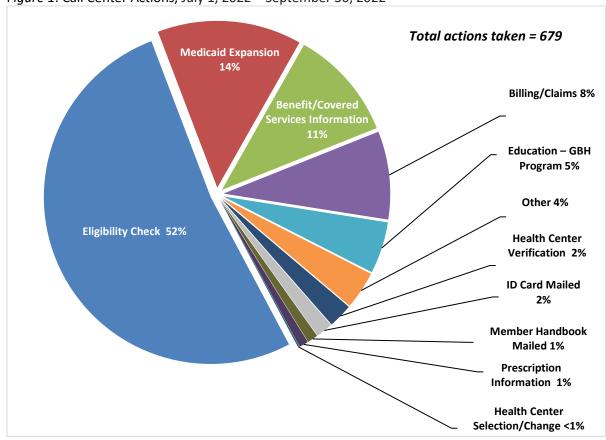
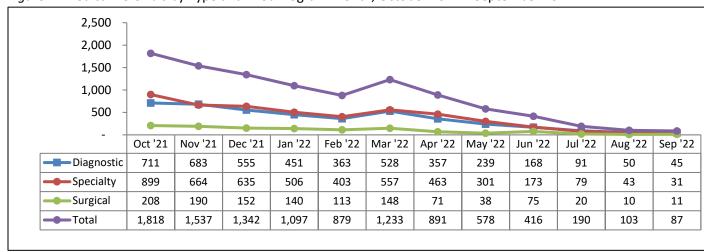


Figure 1. Call Center Actions, July 1, 2022 - September 30, 2022*

Access to Medical Referrals

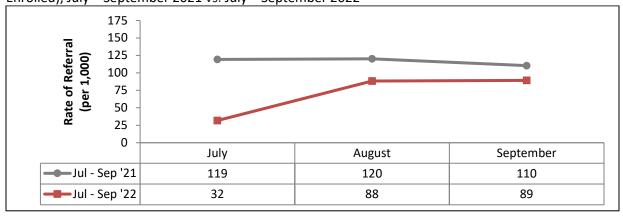
Figure 2. Medical Referrals by Type and Pilot Program Month, October 2021 – September 2022*



stReported call center actions are based on Automated Health Systems data as of November 4, 2022.

^{*}Reported call center actions are based on Automated Health Systems data as of November 4, 2022.

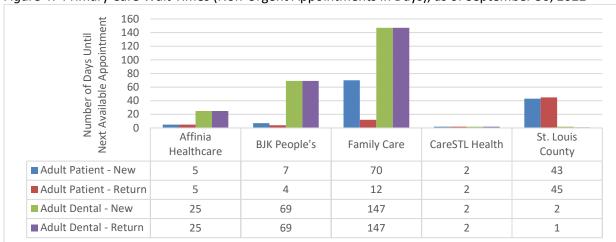
Figure 3. Comparison of Rate of Referral to Specialist by Pilot Program Month (per 1,000 Members Enrolled), July – September 2021 vs. July – September 2022*



^{*}Reported rates of medical referrals are based on Automated Health Systems data as of November 4, 2022. Referral types include diagnostic, specialty, and surgical procedures. Rate of referral is determined by using the total referrals divided by the average monthly enrollment.

Primary Care Appointment Wait Times

Figure 4. Primary Care Wait Times (Non-Urgent Appointments in Days), as of September 30, 2022*



^{*} Wait times are self-reported as a point in time metric by individual health centers as of September 30, 2022 and calculated for Gateway patients only. Gateway primary care providers continue to report dental staffing shortages this quarter and therefore increased wait times for access.

Updates on Provider Incentive Payments:

Table 4. Summary of Provider Payments and Withholds, July – September 2022*

Providers	Provider Payments Withheld	Provider Payments Earned**
Affinia Health Centers	\$12,008	\$313,529
BJK People's Health Centers	\$5,465	\$138,398
CareSTL Health	\$5,854	\$146,793
Family Care Health Centers	\$3,113	\$79,034
St. Louis County Department of Public Health	\$4,029	\$100,915
Voucher Providers	N/A	\$131,823
Total for All Providers	\$30,468	\$910,492

^{*} Payments in the table above are subject to change as additional claims are submitted by providers. Reported provider payments and withholds are based on data as of October 1, 2022, for reporting period July – September 2022.

As documented in previous quarterly reports, the Incentive Payment Protocol requires 7% of provider funding to be withheld from Gateway providers. The 7% withhold is tracked and managed on a monthly basis. The SLRHC is responsible for monitoring the health centers' performance against the pay-for-performance metrics in the Incentive Payment Protocol.

Pay-for-performance incentive payments are paid out at six-month intervals of the Pilot Program based on performance during the following reporting periods:

- July 1, 2012 December 31, 2012
- January 1, 2013 June 30, 2013
- July 1, 2013 December 31, 2013
- January 1, 2014 June 30, 2014
- July 1, 2014 December 31, 2014
- January 1, 2015 June 30, 2015
- July 1, 2015 December 31, 2015
- January 1, 2016 June 30, 2016
- July 1, 2016 December 31, 2016
- January 1, 2017 June 30, 2017
- July 1, 2017 December 31, 2017

- January 1, 2018 June 30, 2018
- July 1, 2018 December 31, 2018
- January 1, 2019 June 30, 2019
- July 1, 2019 December 31, 2019
- January 1, 2020 June 30, 2020
- July 1, 2020 December 31, 2020
- January 1, 2021 June 30, 2021
- July 1, 2021 December 31, 2021
- January 1, 2022 June 30, 2022
- July 1, 2022 December 31, 2022

As the COVID-19 pandemic continues to unfold, the SLRHC recognizes the burden placed on our health care community to respond to our most vulnerable populations during this crisis. Due to these impacts, holding the Demonstration's health center partners to the pay-for-performance criteria and methodologies outlined in the Protocol was not feasible as the project comes to a close. The SLRHC and its stakeholders determined that the suspension of the incentive procedures for this performance

^{**}Amount represents payments made during the quarter, inclusive of payouts from previous quarters.

period was essential to bolster health center stability. As such, the incentive payment amounts withheld from providers during the January 1, 2022 – June 30, 2022 reporting period will be returned in full. The complete report outlining the payment structure for this reporting period can be found in Appendix V.

Updates on Budget Neutrality Worksheets:

The budget neutrality worksheet for the fourth quarter of the federal fiscal year will be provided separately from this monitoring report.

Evaluation Activities and Interim Findings:

Alongside the demonstration's independent evaluator, Mercer Government (Mercer), the SLRHC and the State of Missouri continue to track outcomes for the Gateway to Better Health demonstration project. As health care providers navigate their continued COVID-19 response, the SLRHC will rely on the stakeholders represented on the Pilot's Program Planning Team to establish capacity levels around evaluation collaboration for the demonstration. As the project comes to a close, the measures and outcomes guaranteed in the demonstration's evaluation design will be delivered in the project's summative report.

Updates on the State's Success in Meeting the Milestones Outlined in Section XI:

Date – Specific	Milestone	STC Reference	Date Submitted
12/1/2017	Procure external vendor for evaluation services	Section XI (#39)	Ongoing
12/30/2017	Submit Amended Evaluation Design	Section XI (#40)	12/30/2017
12/30/2017	Submit Draft Annual Report for DY8 (October 2016-September 2017)		12/30/2017
5/31/2018	Finalize Evaluation Design	Section XI (#41)	8/31/2018
Ongoing – due 60 days at the end of each quarter	Submit Quarterly Reports	Section IX (#34)	Ongoing
12/30/2018	Submit Draft Annual Report for DY9 (October 2017 – September 2018)	Section IX (#34/#35)	12/30/2018
12/30/2019	Submit Draft Annual Report for DY10 (October 2018 – September 2019)	Section IX (#34/#35)	12/30/2019
12/30/2020	Submit Draft Annual Report for DY11 (October 2019 – September 2020)	Section IX (#34/#35)	12/30/2020
12/31/2021	Submit Interim Evaluation (January 2018 – December 2020)	Section XI (#47)	12/31/2021
12/30/2021	Submit Draft Annual Report for DY12 (October 2020 – September 2021)	Section IX (#34/#35)	12/30/2021
12/30/2022	Submit Draft Annual Report for DY13 (October 2021 – September 2022)	Section IX (#34/#35)	12/30/2022
5/1/2023	Submit Draft Final Operational Report	Section IX (#34/#35)	
6/30/2024	Submit Summative Evaluation Report	Section XI (#48)	

Enclosures/Attachments

Appendix III: Gateway Team Rosters Appendix IV: Incentive Protocol

Appendix V: Pay for Performance Results

State Contact(s):

Mr. Tony Brite MO HealthNet Division P.O. Box 6500 Jefferson City, MO 65102 (573) 751-1092

Submitted to CMS by December 30, 2022

APPENDIX II: Post Award Forum Summary



Post Award Forum Summary

On May 17, 2022, a post-award public hearing was held, pursuant to 42 C.F.R. § 431.420(c). This meeting was held virtually as part of a joint meeting of the St. Louis Regional Health Commission's (SLRHC) Community, Patient, and Provider Services Advisory Boards. Forty-seven people attended the meeting.

Current membership of the program was presented, alongside an update on the progress of Gateway to Better Health members' transition to Medicaid expansion coverage. The SLRHC also presented interim evaluation findings, highlighting health outcome data for the Gateway patient population.

Attendees were given the opportunity to provide feedback on the program's progress to date. Their feedback and questions raised during this meeting are presented below.

Attendee Feedback Regarding the Demonstration:

- "GBH has been a much needed, albeit limited, lifeline for people not eligible for Medicaid or Marketplace insurance plans. The RHC has been an excellent steward of the program and has not only responded to community need but has also proactively sought input from community stakeholders to optimize resources"
 - Physician, Provider Services Advisory Board member
- "I think that GBH, while not insurance, also served as a socializer to healthcare and healthcare systems for folks who may not have ever had to navigate those spaces and negotiate what is covered and what isn't. I could see that folks on GBH would better navigate the Medicaid system"
 Provider Services Advisory Board member
- "Gateway was a bridge. A much longer bridge than we anticipated when we started. The data demonstrates a sobering reality. Access alone does not equate to positive health outcomes.
 Gateway helps us to understand that as we move into Medicaid expansion and access to coverage"
 Community Advisory Board member
- "Some members complained of difficulty navigating the provider network. But, overall, they appreciated having coverage"
 - Patient Advisory Board member

APPENDIX III: Gateway Team Rosters

Pilot Program Planning Team

Dwayne Butler

President and Chief Executive Officer

Betty Jean Kerr People's Health Centers

Angela Clabon

Chief Executive Officer

CareSTL Health

Caroline Day, MD, MPH

Chief Medical Officer

Family Care Health Centers

Ron Finnan

Chief Operating Officer

St. Louis County Department of Public Health

Todd Richardson

Director, MO HealthNet Division

Missouri Department of Social Services

Joe Yancey

Mental Health Advocate

Places for People (retired)

Angela Brown (ex officio)

Chief Executive Officer

St. Louis Regional Health Commission

Operations Subcommittee

Tony Amato

Assistant Director, Managed Care

SLUCare

Yvonne Buhlinger

Vice President, Development and Community

Relations

Affinia Healthcare

Felecia Cooper

Nursing Supervisor

North Central Community Health Center

Kitty Famous

Manager, CH Orthopedic & Spine Surgeons

BJC Medical Group

Cindy Fears

Director, Patient Financial Services

Affinia Healthcare

Gina Ivanovic

Manager, Referral Programs

Washington University School of Medicine

Andrew Johnson

Senior Director, A/R Management

Washington University School of Medicine

Lynn Kersting

Chief Operating Officer

Family Care Health Centers

Danielle Landers

Community Referral Coordinator Supervisor

St. Louis Integrated Health Network

Antonie Mitrev

Director of Operations

Family Care Health Centers

Dr. James Paine

Chief Operating Officer

CareSTL Health

Jacqueline Randolph

Director, Ambulatory Services

BJH Center for Outpatient Health

Renee Riley

Managed Care Operations Manager

MO HealthNet Division (MHD)

Vickie Wade

Vice President of Clinical Services

Betty Jean Kerr People's Health Centers

Jody Wilkins

Clinical Services Manager

St. Louis County Department of Public Health

Finance Subcommittee

Mark Barry
Fiscal Director
St. Louis County Department of Health

Andrew Johnson

Senior Director, A/R Management

Washington University School of Medicine

Kevin Maddox

Chief Financial Officer

Family Care Health Centers

Rebecca Mankin

Interim Chief Financial Officer

Betty Jean Kerr People's Health Centers

Connie Sutter

Pharmacy Fiscal and Rate Setting Director

MO HealthNet Division

Missouri Department of Social Services

Leslie O'Connor Vice President and Chief Financial Officer Affinia Healthcare

Damon Braggs

Chief Financial Officer

CareSTL Health

Denise Lewis-Wilson

Financial Records/Revenue Manager

St. Louis County Department of Health

Transition Planning Team

Will Ross, MD, MPH (Chair)

Associate Dean for Diversity

Washington University School of Medicine

Kristy Klein Davis

Chief Strategy Officer

Missouri Foundation for Health

Bethany Johnson-Javois, MSW

Chief Executive Officer

St. Louis Integrated Health Network

Rich Liekweg

President & Chief Executive Officer

BJC Healthcare

Wendy Orson

Chief Executive Officer

Behavioral Health Network of Greater St. Louis

Steve Parish, CHW

Local Strategic Consultant &

Community Network Weaver

St. Louis Community Health Worker

Board of Leaders

Spring Schmidt

Acting Director

Saint Louis County Department of Public Health

Nia Sumpter Thomas *Co-Chair* RHC Patient Advisory Board

Susan Trautman

Chief Executive Officer

Great Rivers Greenway

Cierra Walker, MPH

CHW Workforce Partnership

St. Louis Integrated Health Network

Cheryl Walker (Ex. Officio)

Chair, St. Louis Regional Health Commission

Attorney at Law Cheryl Walker

APPENDIX IV: Incentive Payment Protocol

Incentive Payments

The state will withhold 7% from payments made to the primary care health centers (PCHC) through December 31, 2022, and the amount withheld will be tracked on a monthly basis. The St. SLRHC will be responsible for monitoring the PCHC performance against the pay-for-performance metrics outlined below.

Pay-for-performance incentive payments will be paid out at six-month intervals (January – June and July – December) of the Pilot Program based on performance during the reporting period.

SLRHC will calculate the funds due to the providers based on the criteria and methodologies described below and report the results to the state. The state will disburse funds within the first quarter following the end of the reporting period. The PCHC are required to provide self-reported data within thirty (30) days of the end of the reporting period.

Primary Care Health Center Pay-for-Performance Incentive Eligibility

Below are the criteria for the PCHC incentive payments to be paid within the first quarter following the end of the reporting period:

TABLE 1

Pay-for-Performance Incentive Criteria	Threshold	Weighting	Source
All Newly Enrolled Patients - Minimum of at least 1 office	80%	20%	EHR Data
visit within 1 year (6 months before/after enrollment			
date)			
Patients with Diabetes, Hypertension, CHF or COPD –	80%	20%	EHR Data
Minimum of at least 2 office visits within 1 year (6			
months before/after reporting period start date)			
Patients with Diabetes - Have one HgbA1c test within 6	85%	20%	EHR Data
months of reporting period start date			
Patients with Diabetes – Have a HgbA1c less than or	60%	20%	EHR Data
equal to 9% on most recent HgbA1c test within the			
reporting period			
Hospitalized Patients - Among enrollees whose primary	50%	20%	Self-
care home was notified of their hospitalization by the			reported by
Gateway Call Center, the percentage of patients who			health
have been contacted (i.e. visit or phone call for			centers and
status/triage, medical reconciliation, prescription follow			AHS Call
up, etc.) by a clinical staff member from the primary care			Center Data
home within 7 days after hospital discharge.			
TOTAL POSSIBLE SCORE		100%	

Objective measures may be changed for the subsequent reporting period. Any changes or additions will be approved by the Pilot Program Planning Team managed by the SLRHC at least 60 days in advance of going into effect. At no time will changes to the measures go into effect for a reporting period that has already commenced (Note: the health centers and state are represented on the Pilot Program Planning Team). Any changes to the measures will be included in an updated protocol and subject to CMS review.

Any remaining funds will be disbursed based on the criteria summarized below and will be paid within the first quarter following the end of the reporting period:

TABLE 2

Pay-for-Performance Incentive Criteria	Threshold	Weighting	Source
Rate of Referral to Specialist among Tier 1/Tier 2	680/1000	100%	Referral
Enrollees			data

The primary care providers will be eligible for the remaining funds based on the percentage of Demonstration Population 1 individuals enrolled at their health centers. For example, if Affinia has 60% of the primary care patients and CareSTL Health (formerly Myrtle Hilliard Davis) 40%, they would each qualify up to that percentage of the remaining funds. Funds not distributed will be used to create additional enrollment slots where demand and capacity exist. Payments will not be redirected for administrative or infrastructure payments.

Within the first quarter following the end of the reporting period, the state will issue incentive payments to the health centers. Incentive payments will be calculated based on the data received and the methodology described below.

Primary Care Health Center (PCHC) Calculations

Step 1: Calculate the PCHC Incentive Pool (IP) for each PCHC.

• IP = PCHC Payments Earned x 7%

Step 2: Calculate the Incentive Pool Earned Payment (IPEP) that will be paid to each PCHC.

- Identify which performance metrics were achieved
- Determine the total Incentive Pool Weights (IPW) by adding the weights of each performance metric achieved
- Example: If the PCHC achieves 3 of the 5 performance metrics, then: IPW = 20% + 20% + 20% = 60%
- IPEP = IP x IPW

<u>Step 3</u>: Calculate the Remaining Primary Care Incentive Funds (RPCIF) that are available for performance metrics not achieved.

Add the IP for each PCHC to derive the Total IP

- Add the IPEP for each PCHC to derive the Total IPEP
- RPCIF = Total IP Total IPEP

Step 4: Calculate member months (MM) per reporting period for each PCHC (CMM) and in total (TMM).

- CMM = Total payments earned by each PCHC during the reporting period / Rate
- TMM = Total payments earned by **all** PCHC during the reporting period / Rate

Step 5: Calculate the Proportionate Share (PS) of the RPCIF that is available to each PCHC.

• PS = RPCIF x (CMM/TMM)

<u>Step 6:</u> Calculate the Remaining Primary Care Incentive Fund Payment (RPCIFP) for each PCHC. *Example:* If the PCHC achieves specialty referral performance metric, then:

IPW =
$$100\%$$
 (effective $1/1/14 - 12/31/22$)

RPCIFP = PS x IPW

The following scenarios illustrate the calculations for Step 3 through Step 6 explained above as well as the final amounts withheld and paid to each PCHC based on the assumptions of these scenarios. These scenarios are provided for illustrative purposes only and are not a prediction of what may actually occur.

SCENARIO 1

Key assumptions:

- \$40,000 remains in the primary care incentive pool after the first round of disbursements based on the criteria listed in Table 1.
- Each PCHC met the performance metrics for emergency room and specialty referrals based on the criteria listed in Table 2.

Table 1A - Identifies the remaining incentive funds to be disbursed to PCHC.

STEP 3

					I	Remaining		
	7%	Withheld	E	Earned	(Unearned)		
Affinia	\$	200,000	\$:	200,000	\$	-		
CareSTL	\$	100,000	\$	75,000	\$	25,000		
Family Care	\$	20,000	\$	20,000	\$	-		
BJK People's	\$	50,000	\$	40,000	\$	10,000		
St. Louis County	\$	50,000	\$	45,000	\$	5,000		Remaining
Total	\$	420,000	\$.	380,000	\$	40,000		Primary Care Incentive Funds
							· ·	

Table 1B - Identifies each PCHC proportionate share of the remaining incentive funds.

STEP 4

STEP 5

Total	\$	6,000,
St. Louis County	\$	714,
BJK People's	\$	714,
Family Care	\$	285,
CareSTL	\$	1,428,
Affinia	\$	2,857,
	Gro	oss Earn
Affinia		

		# of			
		Member			
Gro	oss Earnings	Months			
\$	2,857,143	54,966			
\$	1,428,571	27,483			
\$	285,714	5,497			
\$	714,286	13,742			
\$	714,286	13,742			
\$	6,000,000	115,430			

		PCHC		
% of Member	Proportionate			
Months	Share			
48%	\$	19,200		
24%	\$	9,600		
4%	\$	1,600		
12%	\$	4,800		
12%	\$	4,800		
100%	\$	40,000		

Table 1C - Computes the remaining primary care incentive fund payment (RPCIFP) for each PCHC assuming the performance metric for specialty referrals is met (Table 2).

Step 6

PCHC Proportionate **IPW** Share **RPCIFP** Affinia 19,200 100% \$ 19,200 Myrtle Hilliard \$ 9,600 100% \$ 9,600 \$ \$ Family Care 1,600 100% 1,600 BJK People's \$ 4,800 100% \$ 4,800 4,800 St. Louis County 4,800 100% \$ Total 40,000 40,000

Table 1D - Shows the total withheld, earned and paid for each PCHC.

	7%	Withheld	Earned RPCIFP		Total Paid		
Affinia	\$	200,000	\$	200,000	\$ 19,200	\$	219,200
Myrtle Hilliard	\$	100,000	\$	75,000	\$ 9,600	\$	84,600
Family Care	\$	20,000	\$	20,000	\$ 1,600	\$	21,600
BJK People's	\$	50,000	\$	40,000	\$ 4,800	\$	44,800
St. Louis County	\$	50,000	\$	45,000	\$ 4,800	\$	49,800
Total	\$	420,000	\$	380,000	\$ 40,000	\$	420,000

SCENARIO 2

Key assumptions:

- \$40,000 remains in the primary care incentive pool after the first round of disbursements based on the criteria listed in Table 1.
- Some PCHC do not meet the performance metric for specialty referrals based on the criteria listed in Table 2.

Table 2A - Identifies the remaining incentive funds to be disbursed to PCHC.

STEP 3 Remaining 7% Withheld Earned (Unearned) Affinia 200,000 \$ 200,000 \$ Myrtle Hilliard \$ \$ 100,000 \$ 75,000 25,000 \$ Family Care \$ 20,000 \$ 20,000 \$ BJK People's 50,000 \$ 40,000 10,000 Remaining \$ St. Louis County 50,000 \$ 45,000 5,000 Primary Care \$ 40,000 Total 420,000 \$ 380,000 **Incentive Funds**

Table 2B - Identifies each PCHC proportionate share of the remaining incentive funds.

		STEP	4	STE	P 5	
			# of Member	% of Member	Pro	PCHC portionate
	Gro	oss Earnings	Months	Months		Share
Affinia	\$	2,857,143	54,966	48%	\$	19,200
CareSTL	\$	1,428,571	27,483	24%	\$	9,600
Family Care	\$	285,714	5,497	4%	\$	1,600
BJK People's	\$	714,286	13,742	12%	\$	4,800
St. Louis County	\$	714,286	13,742	12%	\$	4,800
Total	\$	6,000,000	115,430	100%	\$	40,000

Table 2C - Computes the remaining primary care incentive fund payment (RPCIFP) for each PCHC assuming that some providers did not meet the performance metric for specialty referrals.

	Step 6													
		PCHC												
	Pro	portionate				R	emaining							
		Share	IPW**		RPCIFP	Un	used Funds							
Affinia	\$	19,200	100%	\$	19,200	\$	-							
CareSTL	\$	9,600	0%	\$	-	\$	9,600							
Family Care	\$	1,600	100%	\$	1,600	\$	-							
BJK People's	\$	4,800	100%	\$	4,800	\$	-							
St. Louis County	\$	4,800	0%	\$	-	\$	4,800							
Total	\$	40,000		\$	25,600	\$	14,400							

Table 2D - Shows the total withheld, earned and paid for each PCHC.

	7%	Withheld	ı	Earned	RPCIFP	7	Total Paid
Affinia	\$	200,000	\$	200,000	\$ 19,200	\$	219,200
CareSTL	\$	100,000	\$	75,000	\$ -	\$	75,000
Family Care	\$	20,000	\$	20,000	\$ 1,600	\$	21,600
BJK People's	\$	50,000	\$	40,000	\$ 4,800	\$	44,800
St. Louis County	\$	50,000	\$	45,000	\$ -	\$	45,000
Total	\$	420,000	\$	380,000	\$ 25,600	\$	405,600

Remaining funds would be available to pay for medical services for enrollees as need arises during the federal fiscal year. As the state monitors the demonstration budget and enrollment, the state would take these remaining funds into consideration in determining recommendations about enrollment and payments to providers accepting vouchers.

APPENDIX V: Pay-for-Performance Results

GATEWAY TO BETTER HEALTH

Pay-for-Performance Incentive Payment Results Reporting Period: January – June 2022

Background

The State withholds 7% from payments made to the primary care health centers (PCHC). To calculate the pay-for-performance incentive payments, the St. Louis Regional Health Commission (RHC) monitored the PCHC performance against the pay-for-performance metrics outlined in the Incentive Payment Protocol (Protocol). According to the protocol, pay-for-performance incentive payments will be paid at six-month intervals of the Pilot Program based on performance during the reporting period.

Impact of COVID-19 Pandemic

As the COVID-19 pandemic continues to unfold, RHC recognizes the burden placed on our health care community to respond to our most vulnerable populations during this crisis. The procurement of urgent medical supplies and equipment and the costs of testing patients, transitional staffing, treatment services and basic equipment to expand capacity and navigation services to meet the needs of the increased demand has been paramount for our community health care organizations. Due to the guidelines to limit occupancy capacity as mandated by the local governing bodies, holding the demonstration's health center partners to the pay-for-performance criteria and methodologies outlined in the Protocol was not feasible. The RHC and its stakeholders determined that the suspension of the incentive procedures for this performance period was essential to bolster health center stability and to ensure the successful return to normal business operations during this unprecedented time. As such, the incentive payment amounts withheld from providers during the January – June 2022 reporting period will be returned in full as outlined below.

Primary Care Health Center Pay-for-Performance Results

During the performance period, the PCHC Incentive Pool (PIP) was valued at \$385,283.32, as summarized below by health center.

Table 1

Description		АН			ВЈКР		CSH	FC			County
Number of Criteria Met	а		0		0		0		0		0
Criteria Weight	ь		20%		20%		20%		20%		20%
Incentive Pool Percentage Earned	$c = a \times b$		0%	0%		0%			0%		0%
Incentive Amount Withheld	d	\$	147,903.35	\$	63,004.45	\$	66,027.31	\$	36,020.57	\$	45,327.64
Incentive Amount Earned	$e = c \times d$	\$	=	\$	=	\$	-	\$	-	\$	-
Remaining Balance in PCHC Pool	f = d - e	\$	147,903.35	\$	63,004.45	\$	66,027.31	\$	36,020.57	\$	45,327.64

The following tables illustrate how the PIP was allocated to each PCHC.

Table 2A - Calculates the remaining incentive funds to be disbursed to PCHC.

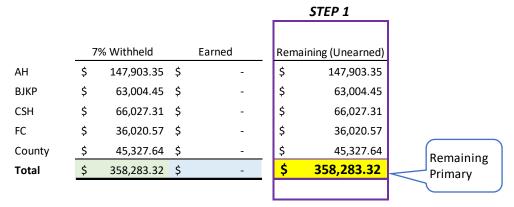


Table 2B - Calculates each PCHC proportionate share of the remaining incentive funds.

		SIE	P Z	 SIEP	3	
						PCHC
			# of Member		P	Proportionate
	G	iross Earnings	Months	% of Member Months		Share
AH	\$	2,112,904.95	28,719	41%	\$	147,903.35
BJKP	\$	900,063.61	12,234	18%	\$	63,004.45
CSH	\$	943,247.34	12,821	18%	\$	66,027.31
FC	\$	514,579.51	6,994	10%	\$	36,020.57
County	\$	647,537.74	8,801	13%	\$	45,327.64
Total	\$	5,118,333.15	69,570	100%	\$	358,283.32

RHC assumed that each PCHC would have met specialty care referral metric if not for the crisis. Therefore, each PCHC will receive its proportionate share of the remaining PIP as calculated in the following table.

Table 2C - Computes the remaining primary care incentive fund payment (RPCIFP) for each PCHC given that the specialty referral metric was met.

Step 4

		PCHC		
	Pi	roportionate		
		Share	IPW	RPCIFP
AH	\$	147,903.35	100%	\$ 147,903.35
BJKP	\$	63,004.45	100%	\$ 63,004.45
CSH	\$	66,027.31	100%	\$ 66,027.31
FC	\$	36,020.57	100%	\$ 36,020.57
County	\$	45,327.64	100%	\$ 45,327.64
Total	\$	358,283.32		\$ 358,283.32

The total amount due to each PCHC for the January - June 2022 reporting period is summarized as follows:

Table 2D - Shows the total withheld, earned and paid for each PCHC.

					Total Due to		Local
	7'	% Withheld	Earned	RPCIFP	Providers	State/Fed Portion	Portion
AH	\$	147,903.35	\$ -	\$ 147,903.35	\$ 147,903.35	116,473.89	31,429.46
BJKP	\$	63,004.45	\$ -	\$ 63,004.45	\$ 63,004.45	49,616.00	13,388.45
CSH	\$	66,027.31	\$ -	\$ 66,027.31	\$ 66,027.31	51,996.51	14,030.80
FC	\$	36,020.57	\$ -	\$ 36,020.57	\$ 36,020.57	28,366.20	7,654.37
County	\$	45,327.64	\$ -	\$ 45,327.64	\$ 45,327.64	35,695.52	9,632.12
Total	\$	358,283.32	\$ -	\$ 358,283.32	\$ 358,283.32	282,148.12	76,135.20

Conclusion

The incentive payments summarized in Table 2D will be issued to the health centers no later than September 30, 2022. All the incentive funds will be paid to the health centers and none will be redirected for administrative or infrastructure payments.

APPENDIX B: PRIMARY CARE TRENDING REPORT

	=		Affinia										CareSTL													
Pay-for-Performance Criteria	Threshold	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	
ay for refrontance criteria	hole	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	
	<u> </u>	14	14	15	15	16	16	17	17	18	18	19	19	14	14	15	15	16	16	17	17	18	18	19	19	
TIER 1 OUTCOMES																										
1 - New patients (1 visit)	80%	67%	65%	74%	70%	72%	72%	75%	77%	74%	71%	64%	69%	71%	75%	83%	80%	66%	53%	70%	62%	58%	62%	70%	64%	
2 - Patients with chronic diseases (2 visits)	80%	83%	80%	86%	84%	87%	86%	87%	87%	90%	84%	84%	81%	87%	92%	94%	96%	93%	83%	86%	87%	93%	98%	97%	98%	
3 - Patients with diabetes HgbA1c tested	85%	87%	91%	92%	95%	90%	97%	89%	98%	97%	96%	96%	86%	48%	91%	86%	100%	92%	93%	85%	96%	94%	100%	96%	100%	
4 - Patients with diabetes HgbA1c <9%	60%	60%	61%	60%	70%	73%	68%	65%	65%	55%	63%	82%	54%	58%	77%	47%	63%	63%	57%	65%	50%	61%	79%	67%	85%	
5 - Hospitalized Patients	50%	87%	83%	85%	96%	95%	75%	91%	91%	88%	100%	71%	71%	73%	88%	64%	83%	93%	44%	44%	50%	54%	78%	59%	53%	
TIER 2 OUTCOME																										
Referral Rate to Specialists	680/1000	277	272	280	281	308	316	394	321	333	343	372	342	345	287	322	272	277	233	250	265	289	208	307	277	
	큐		Family Care											BJK People's												
Pay-for-Performance Criteria	res	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	
,	Threshold	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	
		14	14	15	15	16	16	17	17	18	18	19	19	14	14	15	15	16	16	17	17	18	18	19	19	
TIER 1 OUTCOMES																										
1 - New patients (1 visit)	80%	80%	81%	78%	80%	89%	85%	88%	82%	84%	79%	81%	84%	72%	80%	58%	60%	66%	62%	72%	75%	81%	79%	79%	79%	
2 - Patients with chronic diseases (2 visits)	80%	89%	96%	85%	95%	93%	96%	94%	94%	96%	92%	86%	93%	92%	82%	90%	96%	84%	86%	91%	88%	99%	90%	95%	95%	
3 - Patients with diabetes HgbA1c tested	85%	100%	100%	89%	100%	94%	90%	85%	100%	94%	95%	92%	100%	89%	81%	90%	89%	74%	97%	85%	100%	100%	96%	97%	98%	
4 - Patients with diabetes HgbA1c <9%	60%	75%	71%	68%	68%	83%	95%	69%	81%	76%	74%	71%	59%	56%	62%	61%	67%	60%	60%	52%	69%	77%	76%	64%	59%	
5 - Hospitalized Patients	50%	64%	50%	67%	75%	75%	100%	80%	100%	88%	60%	57%	88%	67%	62%	60%	87%	77%	70%	50%	57%	52%	80%	80%	94%	
TIER 2 OUTCOME																										
Referral Rate to Specialists	680/1000	599	518	528	521	506	497	553	565	595	575	590	544	425	346	337	348	370	360	375	354	365	341	456	346	
														_			_	_								

	#					S	t. Louis	s Count	:у										То	tal					
Pay-for-Performance Criteria	ıres	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-	Jan-	Jul-
,	hol	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec	Jun	Dec
	ď	14	14	15	15	16	16	17	17	18	18	19	19	14	14	15	15	16	16	17	17	18	18	19	19
TIER 1 OUTCOMES																									
1 - New patients (1 visit)	80%	87%	88%	89%	95%	81%	81%	80%	80%	82%	78%	82%	84%	72%	74%	74%	74%	72%	68%	75%	75%	73%	72%	71%	73%
2 - Patients with chronic diseases (2 visits)	80%	92%	97%	97%	92%	88%	86%	81%	84%	92%	92%	96%	90%	86%	86%	90%	91%	88%	86%	87%	87%	92%	89%	90%	88%
3 - Patients with diabetes HgbA1c tested	85%	89%	92%	89%	77%	85%	87%	67%	88%	86%	97%	97%	93%	80%	90%	90%	91%	87%	94%	85%	97%	94%	97%	96%	93%
4 - Patients with diabetes HgbA1c <9%	60%	68%	80%	65%	61%	73%	40%	42%	71%	61%	68%	84%	78%	63%	68%	60%	66%	69%	65%	60%	66%	63%	69%	76%	64%
5 - Hospitalized Patients	50%	83%	65%	80%	100%	62%	100%	61%	64%	65%	65%	59%	78%	81%	78%	78%	91%	88%	71%	71%	75%	68%	82%	68%	75%
TIER 2 OUTCOME																									
Referral Rate to Specialists	680/1000	484	506	536	559	580	501	538	578	621	597	644	710	363	338	351	349	366	346	395	370	391	372	431	400

Note: The threshold for emergency room (ER) utilization for the July 2012 through June 2013 was 36 per 1000. As of January 1, 2014, Gateway to Better Health no longer funded any portion of ER visits and thus no longer captured data for ER utilization.