

Michigan Department of Community Health (MDCH) – Analysis and Observations on HRSA’s Proposed Rule for Designation of Medically Underserved Populations and Health Professional Shortage Areas

Highlights of the Potential Impact on Michigan’s Current HPSA and MUA/P Designation Profile:

The new criteria will affect the distribution of HPSA and MUA/P designated areas in Michigan. Federal estimates utilizing 1999 data suggest that, although there will be a different set of areas designated, 81% of the number of Michigan’s current HPSAs (equivalent to 71% of the currently designated population) would be designated under the new criteria. Similarly, 90% of the number of MUAs and MUPs currently designated (equivalent to 82% of the currently designated population) would be designated under the new criteria. These estimates include areas that would be designated under both Tiers of the new criteria for geographic and for low-income population group designation. HRSA staff have indicated that these figures over-estimate the loss of designation number and population and that especially with the inclusion of local data, these percentages are likely to be higher.

MDCH conducted an analysis of each Michigan county and the prospect for geographic HPSA designation under the new criteria. A detailed description of the analysis is provided below, but in summary: MDCH estimates that 8 of 11 current full-county geographic HPSAs in Michigan will remain full-county geographic HPSAs (either Tier 1 or Tier 2) under the new criteria. Additionally, eight counties that do not currently have full-county geographic HPSAs will be eligible to have such designations under the new criteria. Although it would be a different set of designated areas, 16 (equivalent to 119% of the currently full-county geographically designated population) could be full-county geographically designated under the new criteria.

There will likely be a number of current designations that are not re-designated under the new criteria. However, there is the potential for new areas to be identified as meeting the criteria for designation that are not currently designated. One of HRSA’s stated goals in defining the new criteria was to develop a system that better identifies areas in need. The new criteria do provide a more evidence-based approach to identifying areas with a need for primary care resources.

An MDCH analysis of low-income population group designations is not possible with available data at this time, but there is not evidence to suggest the results of this analysis will differ significantly from the federal analysis described above.

The MDCH Analysis of Michigan’s Full-County Geographic HPSAs Under the Proposed New Criteria:

As of April 1, 2008, nine of Michigan’s eighty three counties are designated as full, single-county geographic primary medical care Health Professional Shortage Areas (HPSAs): Alcona, Clare, Hillsdale, Lake, Menominee, Oceana, Osceola, Oscoda, and Presque Isle. Arenac and Tuscola are also designated as full-county geographic HPSAs as part of larger service areas making the total number of full-county geographic HPSAs eleven.

Utilizing national data sources for high need indicator values and physician counts (state license counts were used for non-physician clinicians) an analysis by the Michigan Department of Community Health (MDCH) of all Michigan's counties (with emphasis on those currently designated as full-county geographic HPSAs) was performed to determine which counties would likely be eligible for geographic HPSA designation under the proposed rule. The proposed rule allows for two "Tiers" of geographic HPSA designation. Tier 1 designations include in the population to primary care clinician ratio, a count of all primary care physicians as well as physician assistants, nurse practitioners, and certified nurse midwives in a service area. Tier 2 designations start with the Tier 1 count and exclude from that count all clinicians in National Health Service Corps (NHSC) scholar or loan repayment programs, state loan repayment programs (SLRP), clinicians in the country under a J-1 Visa waiver of their return-home clause, or clinicians employed at Federally Qualified Health Centers. Designations in both tiers will be considered HPSAs. However, it is anticipated that programs like the NHSC will prioritize new resources to Tier 1 designated areas (those areas eligible for designation even with current NHSC, SLRP, J-1, and NHSC resources included) and distribute resources to Tier 2 designated areas (those areas eligible for designation only when NHSC, SLRP, J-1, and FQHC resources are excluded) only as needed to maintain current levels of support. To the degree possible with available data, both tiers of designation were examined in this analysis.

Available data suggests that 8 counties would be eligible for Tier 1 geographic HPSA designation under the proposed, new criteria. These eight counties include 4 that currently have geographic HPSA designations (Alcona, Lake, Oscoda, and Presque Isle) and 4 counties that do not currently have a geographic HPSA designation (Cass, Keweenaw, Missaukee and Ontonagon). There are 7 currently designated counties (full-county, geographic HPSAs) that would not be designated as Tier 1 geographic HPSAs utilizing national data under the new criteria. Further analysis suggests that two of these counties (Arenac and Menominee) would be eligible for Tier 2 geographic HPSA designation using national data. Also, Iosco, Iron, Montmorency, and Roscommon Counties (not currently geographically designated) would be included among those designated as Tier 2 geographic HPSAs.

Designation Status of Current, Full-County, Geographic HPSAs Under the Proposed Rule – National Data

Counties Currently Designated as Full-County, Geographic HPSAs	Tier 1 Geographic HPSAs with National Data (NPRM-2)	Tier 2 Geographic HPSAs with National Data (NPRM-2)
Alcona	Designated	Designated
Arenac	Not Designated	Designated
Clare	Not Designated	Not Designated
Hillsdale	Not Designated	Not Designated
Lake	Designated	Designated
Menominee	Not Designated	Designated
Oceana	Not Designated	Not Designated
Osceola	Not Designated	Not Designated
Oscoda	Designated	Designated
Presque Isle	Designated	Designated
Tuscola	Not Designated	Not Designated

Counties Without a Current, Full-County, Geographic HPSA Designation, Designated Under the Proposed Rule – National Data

Additional Counties Designated as Geographic HPSAs	Tier 1 Geographic HPSAs with National Data (NPRM-2)	Tier 2 Geographic HPSAs with National Data (NPRM-2)
Cass	Designated	Designated
Iosco	Not Designated	Designated
Iron	Not Designated	Designated
Keweenaw	Designated	Designated
Missaukee	Designated	Designated
Montmorency	Not Designated	Designated
Ontonagon	Designated	Designated
Roscommon	Not Designated	Designated

A more in depth analysis was performed on the 5 counties described above as having a current geographic HPSA designation but no Tier 1 or 2 geographic designation when evaluated under the proposed rule with national data. State collected primary care physician data from the most recent update year possible (2005 or 2006 for these designations) was used in place of national physician counts. With utilization of state collected physician data, 2 of these 5 counties (Clare and Tuscola) were eligible for Tier 2 geographic HPSA designation under the new criteria. This left 3 counties (Hillsdale, Oceana, and Osceola) without eligibility for geographic designation under the new criteria.

Full-County Geographic HPSA Status Under the Proposed Rule for All Counties Evaluated Above – National and State Data

County	Current HPSA Designation Status	Tier 1 Geographic HPSA National Data	Tier 2 Geographic HPSA National Data	Tier 2 Geographic HPSA National High Need Data & State Physician Data
Alcona	Full County – Geographic	Designated	Designated	Designated
Arenac	Full County – Geographic	Not Designated	Designated	Designated
Cass	Partial Geographic	Designated	Designated	Designated
Clare	Full County – Geographic	Not Designated	Not Designated	Designated
Hillsdale	Full County – Geographic	Not Designated	Not Designated	Not Designated
Iosco	Full County – Population	Not Designated	Designated	Designated
Iron	Full County – Population	Not Designated	Designated	Designated
Keweenaw	Full County – Population	Designated	Designated	Designated
Lake	Full County – Geographic	Designated	Designated	Designated
Menominee	Full County – Geographic	Not Designated	Designated	Designated
Missaukee	Full County – Population	Designated	Designated	Designated
Montmorency	Full County – Population	Not Designated	Designated	Designated
Oceana	Full County – Geographic	Not Designated	Not Designated	Not Designated
Ontonagon	Full County – Geographic	Designated	Designated	Designated

Continued

County	Current HPSA Designation Status	Tier 1 Geographic HPSA National Data	Tier 2 Geographic HPSA National Data	Tier 2 Geographic HPSA National High Need Data & State Physician Data
Osceola	Full County – Geographic	Not Designated	Not Designated	Not Designated
Oscoda	Full County – Geographic	Designated	Designated	Designated
Presque Isle	Full County – Geographic	Designated	Designated	Designated
Roscommon	Full County – Population	Not Designated	Designated	Designated
Tuscola	Full County – Geographic	Not Designated	Not Designated	Designated

Taken together, the results of this analysis suggest that at least 16 Michigan counties are eligible for full-county, geographic HPSA designation under the proposed new criteria. This would not include three Michigan counties with current full-county, geographic HPSA designations: Hillsdale, Oceana, and Osceola. The total population in full-county geographic HPSA designations would be higher under the proposed rule (330,620) than are in currently designated areas (277,874).

Summary Comparison – Number of Counties and Population Designated in Full-County, Geographic HPSAs Under the Current Regulations and the Proposed Rule

Number of Counties Currently Designated as Full-County, Geographic HPSAs	Number of Counties Designated as Full-County Geographic HPSAs With the Proposed Rule	Total Population Currently Designated In Full-County geographic HPSAs	Total Population Designated in Full-County Geographic HPSAs With the Proposed Rule
11	16	277,874	330,620

Impact on MUA and MUP Designations in Counties with Full-County Geographic HPSAs:

Currently, eighteen of the nineteen counties analyzed above have MUA/P designations (all but Tuscola County). Three of those counties (Cass, Iosco, and Osceola) have partial county MUA designations, and the remaining fifteen have full-county designations. Under the proposed criteria, those areas eligible for HPSA designation are simultaneously designated as MUPs. Using the designation information above (which only considers full-county, geographic designations under the new criteria) it appears likely that at least sixteen counties would be full-county MUP designated under the proposed rule. Hillsdale County and Oceana County would not maintain their current full-county designation although they could be evaluated for a population group designation. Osceola County would not maintain the designation of the single township within the county that is currently designated although this township could be evaluated on its own or the area could be evaluated for a population group designation. Under the proposed rule, the partial county designations in Cass and Iosco Counties would be expanded and Tuscola County, which is not currently designated, would be eligible for a full-county designation.

MUA/P Designation Status Under the Current Regulations and Under the Proposed Rule

County	Current MUA/P Designation Status	MUP Designation Under New Criteria
Alcona	Full County – MUA	Designated
Arenac	Full County – MUA	Designated
Cass	Partial County MUA	Designated
Clare	Full County – MUA	Designated
Hillsdale	Full County – MUA	Not Designated
Iosco	Partial County MUA	Designated
Iron	Full County – MUA	Designated
Keweenaw	Full County – MUA	Designated
Lake	Full County – MUA	Designated
Menominee	Full County – MUA	Designated
Missaukee	Full County – MUA	Designated
Montmorency	Full County – MUA	Designated
Oceana	Full County – MUA	Not Designated
Ontonagon	Full County – MUA	Designated
Osceola	Partial County MUA	Not Designated
Oscoda	Full County – MUA	Designated
Presque Isle	Full County – MUA	Designated
Roscommon	Full County – MUA	Designated
Tuscola	Not Designated	Designated