

Comparison of Safety Net Financing Provisions in Recent § 1115 Demonstration Programs

	Establishes Safety Net Care Pool (SNCP)	Establishes Limited Public Provider Network for Expansion	Changes to DSH Program*	New Limits on Payments to Public Providers	Limits on use of IGTs as Non-Federal Share	Requires Funding to be Retained by Provider	CPEs Expressly Encouraged	New Limits on Use of Provider Tax	Requires CMS Preapproval of Financing*	Funding Contingent on Meeting Milestones
California <i>Medi-Cal Hospital/ Uninsured Care Demonstration Project</i>	Yes Federal match on SNCP payments capped at \$766M (federal) per year	No	Yes DSH paid to public DSH hospitals based on CPEs from specified hospitals; DSH paid to private hospitals to the extent required under federal law, through a defined private DSH pool.	Yes SNCP reimbursement based on costs as reported on the Medicare cost report (and as per funding and reimbursement protocol). The state may make Construction/ Renovation Reimbursement Program payments to hospitals above costs, but such payments must be offset against DSH cap.	Yes IGTs prohibited for DSH payments up to 100% of unreimbursed costs, but IGTs may be used as non-federal share above 100% (up to 175%). IGTs may not fund SNCP payments.	Yes Payments to private hospitals funded by IGTs must remain with the hospital. CA to provide annual assurances that government-operated hospitals will retain full amount of DSH payment resulting from IGT.	Yes	Yes No new provider tax, fee or assessment on inpatient or outpatient hospital services or, physician services.	Yes CA may only access SNCP funds if source of non-federal share and funding and reimbursement protocol have been preapproved.	Yes \$180M of federal match each year contingent on CA meeting annual milestones; in Year 1 of the demonstration, CA will not meet milestones and will forfeit \$180M.
Florida <i>Medicaid Reform Waiver</i>	Yes Low Income Pool (LIP) capped at \$1B (state and federal) per year.	No	No	Yes LIP payments for hospital/non-hospital expenditures limited to Medicare cost report plus "mutually agreed upon additional costs."	No	No	No	No	Yes FL may only access SNCP funds if source of non-federal share and funding and reimbursement protocol have been preapproved.	Yes Prior to demo start all funding contingent on milestones; in years 2-5, \$150M of federal match each year contingent on meeting annual milestones.
Massachusetts <i>MassHealth</i>	Yes SNCP capped at \$1.23B (state and federal) per year.	No	Yes DSH allotment folded into new SNCP.	Yes CMS terminated waiver of provision that previously allowed higher payments to managed care organizations SNCP payments limited to unreimbursed costs (no new limits on FFS public provider payments outside of the SNCP).	No Explicit mention of IGTs derived from state or local taxes, transferred by units of government; others could be also preapproved.	No	Yes	No	Yes MA may only access SNCP funds if source of non-federal share has been preapproved.	No
Iowa <i>IowaCare</i>	No	Yes Coverage of adults 19-64 up to 200% FPL through University of Iowa and Broadlawn.	No	Yes Hospital and nursing facility reimbursement limited to costs on Medicare cost report. State required to terminate supplemental payments for hospitals, physicians and nursing facilities.	No IGTs continue to be permissible subject to limits on retention of funds.	Yes Certain supplemental payments in which providers do not retain full payments must be terminated; IA must provide assurances that providers will retain funding associated with certain pending supplemental hospital and physician SPAs for period prior to start of demonstration.	No	Yes No new provider taxes during the period of the waiver.	Yes IA must receive CMS preapproval of all sources of non-federal share funding.	Yes IA is required to submit an Implementation Plan including milestones and performance benchmarks but funding not explicitly tied to achievement of the milestones.

* State waivers beyond those described here may also include financing provisions relevant to these categories.