# Rural Health Transformation Grant Guide — Massachusetts

**VERSION:** 1.0 **DATE:** 2025-10-13

**AUDIENCE:** State health agencies, Medicaid, rural providers, collaboratives

AI-GENERATED CONTENT - VALIDATE BEFORE OFFICIAL USE.

## 1. Executive Summary

Massachusetts has a comparatively small but consequential rural population (≈613,000; 8.7% in 2020), a compact network of rural facilities (4 Critical Access Hospitals; 0 Rural Emergency Hospitals as of July 2025), strong telehealth coverage law, and measurable progress against opioid mortality in 2023. These signals position the Commonwealth to target Rural Health Transformation (RHT) investments to right-size rural access points, scale technology-enabled care, and harden data infrastructure while remaining within CMS caps and scoring logic. [3][4][5][8]. (ncsl.org) (ruralhealthinfo.org) (malegislature.gov) (mass.gov)

The Rural Health Transformation Collaborative (the Collaborative) offers a configurable catalog of capabilities—tele-specialty and hospital support (Avel eCare), remote physiologic monitoring (BioIntelliSense), retail-embedded access (CVS Health, Walgreens), analytics and cybersecurity (Microsoft and advisors), and governance supports for provider networks (Cibolo Health)—that can be aligned to the NOFO's allowed uses and technical factors, subject to State procurement, integration, and policy validation. See Section 2 for an at-a-glance alignment to CMS-RHT-26-001 requirements. [1]. (files.simpler.grants.gov)

#### 2. NOFO Fit at a Glance

NOFO Pillar/Requirement	Massachusetts Current Signal	Collaborative Capability (conditional)	Validation Needed?
Strategic goals (prevention; sustainable access; workforce; innovative care; tech)	Telehealth parity in law; opioid deaths \$10% in 2023; small rural share (8.7%). [5][8][3] (malegislature.gov) (mass.gov) (ncsl.org)	Chronic disease screening/RPM; tele-behavioral; tele-ICU/ER; cybersecurity/data fabric; value-based design support.	Confirm target geographies and baselines per NOFO Step 3. [1] (files.simpler.grants.gov)
Allowed uses (A–K)	Facility and retail footprint supports A/C/D/F/H/I/J; broadband gaps are low but non-zero. [9][10] (broadband.masstech.org) (bbcmag.com)	Tele-specialty, RPM, kiosks, analytics, minor renovations, EMS integration (subject to caps).	Pre-screen for capital (Cat. J ≤20%), provider payment (≤15%), EMR replacement (≤5%). [1] (files.simpler.grants.gov)
Distribution/scoring	50% baseline + 50% workload; Table 3 weights; policy commitments time-boxed (2027/2028). [1] (files.simpler.grants.gov)	Package initiatives to map to Table 3 levers (e.g., EMS, partnerships, data).	Finalize State policy timelines; document DSH hospital count per SPRY. [1] (files.simpler.grants.gov)
Administrative cap	≤10% (includes indirects). [1] (files.simpler.grants.gov)	PMO toolsets and advisors can support compliant administration if procured.	Validate indirect rate and admin roll-up in SF-424A narrative. [1] (files.simpler.grants.gov)
Submission timing	LOI by Sep 30, 2025 (optional); application due Nov 5, 2025; awards by Dec 31, 2025. [1] (files.simpler.grants.gov)	Grant assembly aids and initiative templates (subject to State edits).	Confirm governor's letter content and attachment list per NOFO. [1] (files.simpler.grants.gov)

## 3. Massachusetts Rural & System Context

Metric	Year	Value	Source	Relevant Capability
Rural population (count; %)	2020	613,022; 8.7%	U.S. Census via NCSL table. [3] (ncsl.org)	Targeting and denominator setting for NOFO metrics.
Rural facilities (CAHs; REHs; rural-located RHCs; FQHC sites)	2025	CAH 4; REH 0; RHC 7; FQHC 15 (rural-located sites)	RHIhub MA State Guide, HRSA data notes (as of July 2025; updated 9/11/2025). [4] (ruralhealthinfo.org)	Tele-specialty backstops; RPM; access hubs.
Broadband readiness (un/underserved locations)	2024	≈0.8% un/underserved of locations (Ready.net est.); Commonwealth map in public beta	Broadband Communities (Ready.net, Feb 2024); MBI Map Gallery. [10][9] (bbcmag.com) (broadband.masstech.org)	Emphasis on clinic Wi-Fi hardening, cybersecurity, device programs.
Telehealth policy status	2020– 2025	Coverage mandated when clinically appropriate; payment parity permanent for behavioral health; broader parity windows lapsed per statute, with payer variation	MA Session Law 2020 Ch.260; payer updates. [5] ( <u>malegislature.gov</u> )	Tele-behavioral scaling; contract alignment.
Nurse Licensure Compact	2025	Enacted 11/20/2024; implementation pending; Board estimated ≈12 months; still not operational as of Oct 2025	MA Board of Registration in Nursing (Jan 3, 2025); Home Care Alliance (Oct 10, 2025). [6][7] (mass.gov) (members.thinkhomecare.org)	Workforce mobility planning; interim credentialing playbooks.

Metric	Year	Value	Source	Relevant Capability

Opioid/SUD trend	2023	Opioid overdose deaths down 10% (2,125; 30.2 per 100k); early 2024 decline continues	MA DPH press release (Jun 12, 2024). [8] (mass.gov)	Tele-SUD, CCBHC linkages, naloxone
				routing via community/retail.

# 4. Implementation Dependencies & Assumptions

Dependency Category	Why It Matters	Typical Lead Time/Risk	Mitigation Support (Collaborative)	Validation Owner
Contracting & Procurement	Multi-vendor enablement requires compliant vehicles and flow-downs. [1] (files.simpler.grants.gov)	3–9 months; schedule risk	Advisors provide standard artifacts, SOW libraries, vendor neutral design.	State procurement.
Credentialing & Licensing	Tele-specialty and virtual services require privileges and interstate practice logic; NLC not yet operational. [6][7] (mass.gov) (members.thinkhomecare.org)	2–6 months; compact timing risk	Credentialing playbooks; interim locum/tele-support.	Provider orgs; licensing boards.
Data Use & Interoperability	HIE/TEFCA participation; claims/clinical data linking; QHIN/QON alignment. [1] ( <u>files.simpler.grants.gov</u> )	Interface build cycles	Cloud data fabric, standards mapping, HIE connectors (subject to integration).	State HIT/HIE lead.
Privacy & 42 CFR Part 2	SUD data segmentation and consent across partners.	Policy and technical segmentation risk	Consent tooling, policy templates; TA.	State legal/privacy.
Workforce Adoption & Training	Rural staff capacity and turnover affect uptake.	Ongoing	Training curricula, tele-mentoring, ambient documentation pilots.	Provider leadership.
Broadband/Technical Readiness	Site connectivity and cyber baselines.	1–6 months per site	Cyber hardening, network assessments.	Site IT; MBI.
Payment & Actuarial Design	Align RHT-enabled services with sustainable reimbursement; provider payments capped. [1] (files.simpler.grants.gov)	Contracting cycles	APM advisory; directed-payment compatibility reviews.	Medicaid/actuary.
Governance & Compliance	PMO, subrecipient oversight, 2 CFR/HHS GPS adherence; admin ≤10%. [1] ( <u>files.simpler.grants.gov</u> )	Continuous	PMO tools; dashboards; subrecipient monitoring.	Lead agency PMO.

# **5. Strategic Model**

A sequenced approach can start with (a) safety-critical supports to CAHs and FQHCs (tele-ER/ICU; transfer coordination), (b) rural chronic-care pathways (screening + RPM + retail/pharmacy touchpoints), and (c) a data/security spine that standardizes exchange and reporting. Equity is advanced by locating services in lower-access rural tracts and using linguistically accessible triage/engagement tools; data/privacy are addressed by TEFCA-aligned exchange, minimum-necessary data flows, and 42 CFR Part 2 consent segmentation, subject to State policy. [1][4]. (files.simpler.grants.gov) (ruralhealthinfo.org)

RHT Scoring Dimension	Lever	Supporting Capability	Evidence Ref.
C.1 Strategic partnerships	Rural provider networks; transfer agreements	Cibolo-enabled HVN governance; advisor convenings	[1] (files.simpler.grants.gov)
C.2 EMS	Tele-ER consults and protocols	Avel eCare tele-emergency support	
E.1 Payment incentives	APM design TA; analytics	Advisors; data fabric for quality/payment	
F.1 Remote care	RPM + tele-follow-up	BioIntelliSense + tele-clinics	
F.2 Data infrastructure	Secure cloud/HIE connectors	Microsoft platform + integration	
F.3 Consumer tech	Multilingual intake, kiosks	Humetrix; retail kiosks	

## 6. Program Option Comparison

Option	Primary Objective	Target Population	Core Capabilities	Key Dependencies	Illustrative Outcomes (baseline→target)	Risks	When to Prioritize
A. Rural acute-care stabilization	Reduce avoidable transfers; stabilize CAHs	CAHs and rural EDs	Tele-ER/ICU, pharmacy, transfer coordination; cyber hardening	Credentialing; on-call schedules	30-day readmissions; ED transfer rates (documented local baselines→reduction over 12–18 months)	On-call coverage; integration complexity	If CAHs report staffing/coverage gaps or closure risk.
B. CKD/diabetes/HTN pathway	Improve chronic-care control; reduce ED use	Rural adults with uncontrolled conditions	Retail/community screening; RPM; tele-primary; medication therapy management	Payer alignment; device logistics	HbA1c≥9% share; BP control; ED visits (baseline→improvement)	Device adherence; data integration	If chronic disease rates drive avoidable utilization.
C. Behavioral health access	Expand tele-behavioral; link CCBHCs	Rural adults/youth with SUD/MH	Tele-behavioral, crisis consults, 988 integration; consent tooling	42 CFR Part 2; network sufficiency	BH visit access times; MOUD initiation (baseline→improvement)	Privacy segmentation; workforce	If SUD/MH delays are documented.

Recommendation (conditional): Option A plus Option B as primary path, with Option C as a contingency or parallel pilot in high-need areas. This mix maps to NOFO uses A/D/F/H/I/J and high-weight technical factors (C.1/C.2; F.1–F.3), while staying within caps for provider payments and capital. [1]. (files.simpler.grants.gov)

#### 7. Governance & Roles

RACI (illustrative)

- Sponsor (State lead agency): Accountable for strategy, approvals, subrecipient oversight, reporting to CMS. [1]. (files.simpler.grants.gov)
- Rural providers/CCBHCs/FQHCs: Responsible for delivery, data submission, quality improvement.
- Collaborative members (advisors, technology, retail partners): Consulted to design, implement, and monitor capabilities; not a substitute for State authority.
- Payers: Consulted; align incentives; value-based models.
- Communities/consumers: Informed/consulted through engagement forums.

Note: Partnership support does not obviate statutory, financial, or programmatic responsibilities retained by the State under the cooperative agreement. [1]. (files.simpler.grants.gov)

## 8. Payment & Funding Pathways

Mechanism	Use Case	Data Needed	Collaborative Support	Risk/Dependency
RHT Category B (provider payments; ≤15%)	Gap-filling services (e.g., non-reimbursed tele-navigation)	Service definitions; uncompensated care rationale	Design/controls to avoid duplication	Cap limit; payer duplication. [1] (files.simpler.grants.gov)
Medicaid APMs / directed payments	Sustain RPM/tele-specialty savings	Baselines; attribution; quality specs	APM design TA, analytics	Timing with MCOs/contracts.
Capital & infrastructure (Cat. J; ≤20%)	Tele rooms; devices; minor renovations	Site list; quotes; tie to outcomes	Facility assessments; procurement aids	Cap limit; no construction. [1] (files.simpler.grants.gov)
Data/cyber investments	HIE connectors; cloud; MFA	Inventory; risk assessment	Cloud governance templates	Security approvals.

Illustrative—Subject to State Validation (ROM)

Workstream	ROM Annual Band (per NOFO placeholder \$200M/yr planning)	Notes
Acute-care stabilization	\$25M-\$60M	Mix of tele-services + site enablement.

Workstream	ROM Annual Band (per NOFO placeholder \$200M/yr planning)	Notes
Chronic-care/RPM	\$20M-\$50M	Devices + nurse monitoring + analytics.
Behavioral health access	\$10M-\$30M	Tele-BH, crisis supports, consent tooling.
Data/cyber spine	\$15M-\$40M	Cloud tenancy, HIE/API builds, security.
PMO/admin (≤10% total)	≤\$20M	Must include indirects. [1] (files.simpler.grants.gov)
Note: NOFO requests using \$200M/year as a budgeting placeholder for tables. [1]. (files.simpler.grants.gov)		

## 9. Data, Measurement & Evaluation

Core metric set (examples)

- Access: rural specialist wait time; travel time to definitive care; tele-visit counts.
- Quality/outcomes: BP control; HbA1c; COPD/asthma ED visits; readmissions.
- Financial: aggregate rural hospital margin; uncompensated care; avoided transfers.
- Workforce: vacancies filled; retention; tele-consult usage.
- Technology: uptime; phishing rates; data exchange transactions. Cadence: Quarterly internal; annual CMS reporting; align with NOFO evaluation cooperation language. [1]. (files.simpler.grants.gov)

#### Validation Checklist

Item	Current Status	Source Type	Needs Confirmation?
DSH hospital count (most recent SPRY)	To be confirmed by EOHHS	State admin data	Yes. [1] ( <u>files.simpler.grants.gov</u> )
CCBHC list (as of Sep 1, 2025)	Compile from SAMHSA/State	Federal/state	Yes. [1] (files.simpler.grants.gov)
Rural sites and broadband scores	MBI + FCC data export	State/FCC	Yes. [9] ( <u>broadband.masstech.org</u> )
Baselines for outcomes	Extract per initiative	State/provider	Yes.

# 10. Implementation Roadmap (12-24 months; capability-oriented)

Workstream	Phase Window	Key Activities	Capability Inputs	Exit Criteria
Tele-ER/ICU & transfers	0–6 mo	Credentialing; protocol mapping; on-call rosters	Avel eCare; facility readiness	24/7 coverage in pilot sites; transfer KPIs baselined.
Chronic pathway (HTN/DM/CKD)	3–12 mo	Screen→enroll→monitor→adjust	BioIntelliSense; retail partners; CHCs	≥70% enrolled with active monitoring; care plan adherence.
Tele-behavioral	3–12 mo	Network mapping; consent segmentation	Tele-BH partners; consent tools	Tele-BH slots open; 42 CFR Part 2 workflows live.
Data/cyber spine	0–18 mo	Data model; HIE connectors; MFA rollout	Microsoft cloud; SI partners	First dashboards; security controls audited.
PMO & reporting	0–24 mo	Subrecipient monitoring; quarterly reviews	Advisor PMO toolkits	CMS reporting on time; admin ≤10%. [1] (files.simpler.grants.gov)

# 11. Risk & Mitigation Register

Risk	Category	Likelihood/Impact	Mitigation	Residual	
				Status	

Risk	Category	Likelihood/Impact	Mitigation	Residual Status
Multi-vendor integration complexity	Technical	Medium/High	Use standard APIs; stage pilots; SI oversight; State change control.	Residual medium.
Policy timing (NLC not operational)	Workforce	Medium/Medium	Interim tele-support; in-state staffing pipelines; monitor timeline. [6][7] (mass.gov) (members.thinkhomecare.org)	_
Exceeding NOFO caps	Compliance	Low/High	Budget guardrails; independent cap checks. [1] (files.simpler.grants.gov)	_
Data-sharing/consent gaps (42 CFR Part 2)	Legal	Medium/Medium	Consent management tooling; policy TA.	_
Cyber incident	Security	Medium/High	Baseline controls; patching; incident response tabletop.	_
Provider burnout/adoption	Operational	Medium/Medium	Ambient documentation; tele-mentoring; change management.	_
Broadband last-mile pockets	Infrastructure	Low/Medium	Site surveys; backup links; device caching. [9][10] (broadband.masstech.org) (bbcmag.com)	_
Payment misalignment	Financial	Medium/Medium	APM design; payer MOUs; monitor utilization drift.	_
Data quality/attribution	Measurement	Medium/Medium	Data governance; common IDs; validation cycles.	_
Subrecipient oversight gaps	Compliance	Low/High	PMO dashboards; site audits; training.	_

### 12. Draft Narrative Language (modular; ≤120 words each)

- Rural health needs & target population (example) Massachusetts' rural population (≈613,022; 8.7% of residents in 2020) is concentrated in Western MA, Cape & Islands, and select central counties. Rural providers include 4 Critical Access Hospitals and rural FQHC/RHC sites. We will focus on tracts with higher chronic disease burden and longer travel times, using granular county/ZIP and FCC/MBI broadband indicators to prioritize sites. [3][4][9]. (ncsl.org) (ruralhealthinfo.org) (broadband.masstech.org)
- Strategies, goals, and policy alignment (example) Our plan emphasizes safety-critical tele-supports for rural hospitals, chronic-care pathways using RPM and pharmacist-enabled management, and a secure data/cyber spine. It aligns to NOFO uses A/D/F/H/I/J and technical scoring factors C.1/C.2/E.1/F.1–F.3. Conditional policy commitments (e.g., workforce compacts) are time-boxed per NOFO. [1]. (files.simpler.grants.gov)
- Caps & compliance (example) All initiatives adhere to caps: provider payments ≤15% of award; capital (Cat. J) ≤20%; EMR replacement ≤5% where
  a HITECH-certified system existed by 9/1/2025; any "Rural Tech Catalyst"-like activity ≤ the lesser of 10% or \$20M. Administrative costs (including
  indirects) ≤10%. [1]. (files.simpler.grants.gov)
- Telehealth/legal context (example) Telehealth coverage is mandated when clinically appropriate; behavioral health payment parity is permanent under Chapter 260 of the Acts of 2020. Implementation of the Nurse Licensure Compact is pending; we account for this in workforce plans. [5][6]. (malegislature.gov) (mass.gov)
- SUD/behavioral health (example) Opioid-related overdose deaths fell 10% in 2023 (2,125; 30.2 per 100k), with early 2024 declines continuing, motivating scaled tele-SUD and crisis supports while addressing inequities. [8]. (mass.gov)

#### 13. Assumptions & Validation Items

- Confirm the number of hospitals receiving Medicaid DSH payments for the most recent State Plan Rate Year (SPRY) and the total hospital count (for Table 3 A.7). [1]. (files.simpler.grants.gov)
- Provide the CCBHC site list as of Sep 1, 2025 (name, site, county). [1]. (files.simpler.grants.gov)
- Verify nurse compact operational status and interim credentialing pathways (NLC). [6][7]. (mass.gov) (members.thinkhomecare.org)
- Validate rural broadband pockets using MBI/FCC datasets for site selection. [9]. (broadband.masstech.org)
- Establish baselines and targets for each initiative outcome, including at least one county/community-level metric per initiative. [1]. (files.simpler.grants.gov)
- Map capital requests to Cat. J definitions and caps; screen for construction exclusions. [1]. (files.simpler.grants.gov)

#### 14. References

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- 11. Internal: Rural Health Transformation Collaborative. R1. 10-11-25 (capabilities and member roles). (Provided by user; internal catalog).

#### 15. Al Generation Notice

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