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HEALTH CARE **UNINTERRUPTED**

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Rural Health Transformation Program

From Strategy to Execution

PREPARED BY
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Health Care Uninterrupted

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THE OPPORTUNITY

The Rural Health Transformation Program ("RHTP") represents one of the most significant federal investments in rural health care in decades. It creates a meaningful opportunity for states and rural providers to move beyond incremental fixes and address long-standing structural challenges.

CMS has identified five core goals for the RHTP, including: 1) improving access to care in rural communities; 2) supporting the long-term sustainability of rural providers; 3) strengthening the health care workforce; 4) advancing innovative and value-based models of care; and 5) investing in technology and infrastructure to support the delivery system.

Across the country, states and providers are developing increasingly sophisticated proposals. These efforts are coalescing around care delivery redesign, investment in data and workforce infrastructure and new approaches to payment and financial alignment. Many initiatives also focus on regional coordination, recognizing that long-term sustainability often depends on connected systems of care rather than standalone facilities.

RHTP is not just an opportunity to fund individual initiatives. It is an opportunity to rethink how care is delivered across a community or region, expanding access, strengthening coordination and building models that can be sustained over time.

As these strategies take shape, the focus shifts to execution.

Hall Render works with clients to translate complex regulatory, financial and operational concepts into structures that can be implemented in practice and sustained over time. For nearly 60 years, our attorneys have helped organizations move from planning to implementation in a way that is workable, aligned and built to succeed over time.

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ABOUT HALL RENDER

Hall Render is the nation's largest law firm focused exclusively on representing the health care industry. For decades, the Firm has represented hospitals, health systems, physician groups and other providers nationwide, with particular depth supporting rural and community-based organizations.

Our Rural Health practice provides practical, operations-focused legal and strategic counsel to organizations navigating complex system-level transformation. We work with providers in environments defined by limited resources, evolving reimbursement models and increasing regulatory expectations.

Hall Render has represented the health care industry since 1967. In the current environment, that experience matters. RHTP has drawn significant attention from organizations new to rural health care, but successful implementation depends on understanding how rural providers operate and how complex initiatives function in practice over time.

We focus on helping clients build structures that work within the realities of rural health care and continue to operate effectively as programs mature.

Our work spans the legal, regulatory and operational issues that arise in RHTP initiatives and similar transformation efforts, including:

- Rural collaboration models, including clinically integrated networks, value-based enterprises, accountable care participation and other regional alignment strategies
- Regulatory compliance and risk management, including alignment with federal and state program requirements
- Reimbursement and payment strategy, including alternative payment models and value-based care arrangements
- Governance and organizational structuring, particularly for multi-party and regional initiatives
- Complex contracting and alignment models, including provider networks, vendors and collaborative arrangements
- Development and implementation of virtual care and technology-enabled programs
- Data use, sharing and integration, including structuring compliant data-sharing frameworks
- Workforce strategy and provider recruitment, including support for rural workforce development efforts

Serving more **than 5,000 health care clients** nationwide, Hall Render combines deep regulatory knowledge with a collaborative, team-based approach that provides practical, coordinated guidance supporting both immediate implementation and long-term success.

MOVING FROM STRATEGY TO IMPLEMENTATION

As RHTP initiatives move from concept to implementation, the work becomes more practical and more complex.

At the planning stage, proposals are evaluated based on alignment, impact and overall design. Implementation requires translating those concepts into structures that function across organizations, align with program expectations and hold up over time.

RHTP models often involve multiple parties, including state agencies, hospitals, provider networks, vendors and other partners. Each brings different roles, incentives and constraints. Those relationships must be structured in a way that is workable in practice and aligned with program requirements.

Even targeted initiatives require this level of structuring. Decisions around participation, reimbursement, data sharing and accountability are foundational to whether a program can function as intended. Addressing these issues early helps avoid reworking core elements once implementation is underway.

RHTP funding also brings additional structure, reporting and accountability expectations that must be built into the program from the outset. These expectations reflect federal grant requirements that flow through the state and, in many cases, to downstream participants. Organizations need to be positioned not only to operate the program, but also to support monitoring, performance tracking and potential audit response.

These elements are part of how programs maintain alignment, demonstrate value and sustain momentum as they evolve.

Hall Render works with clients to address these considerations early. We help design structures that align operational realities with legal and contractual requirements and support implementation over time.

The result is an approach that is workable, aligned and sustainable.

KEY AREAS OF FOCUS FOR RHTP IMPLEMENTATION

As RHTP initiatives continue to take shape, several core areas are emerging as central to successful implementation. While specific issues vary by program, these areas consistently influence how effectively initiatives move into execution and how well they hold up over time.

1. **Governance**
   Many initiatives involve collaboration across multiple entities, making clarity around decision-making authority and accountability essential. Establishing these structures early helps avoid misalignment.

2. **Participant Structure and Relationships**
   RHTP initiatives often depend on networks of providers, vendors and partners. These relationships must reflect operational realities and program expectations, with clear allocation of responsibilities, risk and performance obligations. This often includes appropriate contracting structures and determining whether participants are operating as contractors or subrecipients.

3. **Funding Structure**
   Organizations need to understand how funds will flow, what conditions apply and how those conditions affect program design. These issues are governed by federal grant requirements that flow through the state and to participating entities. Addressing them early is critical to aligning structure and avoiding rework.

4. **Data and Reporting Infrastructure**
   Many initiatives rely on performance tracking and data sharing, requiring infrastructure and processes that support these expectations from the outset and adapt as reporting requirements increase.

5. **Sustainability**
   CMS and the states have consistently emphasized long-term sustainability. While funding creates opportunity, success depends on aligning operational models, reimbursement and partnerships to continue beyond the funding period.

Focusing on these areas early allows organizations to move efficiently into implementation and maintain momentum.

HOW HALL RENDER SUPPORTS EXECUTION

Hall Render works with clients to move from concept to implementation in complex, real-world environments.

We do not just identify issues. We help structure solutions that work in practice.

Our approach is grounded in a deep understanding of health care regulatory frameworks, practical experience with provider operations and the ability to align legal, financial and operational considerations. Our work focuses on the decisions and structures that determine whether an initiative will function effectively and remain sustainable over time. This includes:

- **Structuring programs for practical execution.**
  Defining entity roles, governance frameworks and decision-making structures that are workable in practice
- **Developing contracting frameworks.**
  Establishing clear allocation of responsibilities, risk and performance expectations across providers, partners and vendors
- **Addressing funding structure and sustainability.**
  Aligning funding flows and program design with federal grant requirements and long-term realities
- **Protecting intellectual property and data rights.**
  Structuring ownership, licensing and use rights for data, tools and collaborative models
- **Supporting reporting and operational accountability.**
  Building frameworks that support monitoring, performance tracking and audit readiness
- **Mitigating execution risk.**
  Identifying structural and operational risks early and aligning stakeholders around implementable solutions

Our role is to help ensure that initiatives are structured to function across organizations, operate effectively over time and support long-term sustainability. Organizations have worked hard to secure this funding. We help ensure the structure supports that work and allows it to continue without interruption.

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OUR RURAL HEALTH TEAM

Hall Render's Rural Health practice is led by a national bench of attorneys who advise rural providers, health systems and states across the full range of regulatory, reimbursement and strategic matters. Hall Render represents more than 135 Critical Access Hospitals nationwide and serves as general counsel to dozens, with deep experience supporting Critical Access Hospitals, Rural Emergency Hospitals, Rural Health Clinics, Federally Qualified Health Centers and other rural providers.

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Our Rural Health attorneys are supported by Hall Render's broader bench of health care specialists in reimbursement, regulatory, transactional, data and IP, workforce and governance matters—allowing us to bring the right subject-matter experts to each engagement.

CONCLUSION

The Rural Health Transformation Program presents a rare opportunity to make meaningful, long-term changes to how care is delivered in rural communities.

Across the country, states and providers are developing thoughtful strategies and identifying areas for investment. The organizations that succeed will be those that move effectively from planning to implementation while putting the right structures in place to support long-term success.

That requires more than a strong concept. It requires alignment across organizations, clear governance, well-structured relationships and a practical approach to sustaining programs over time. It also requires the ability to meet ongoing state and federal expectations around reporting, monitoring and audit, which are integral to how these programs operate and evolve.

For nearly 60 years, Hall Render has worked with health care organizations to translate strategy into structures that work in practice. We help clients design and implement approaches that are aligned, workable and built to sustain the underlying work over time.

If you are developing or implementing an RHTP initiative, we welcome the opportunity to talk. A short conversation can help pressure-test structural decisions, identify implementation issues early and determine where outside support could accelerate progress.

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