September 25, 2017

The Honorable Tom Price  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Price,

We write today to express concerns with the Centers for Medicare and Medicaid Services (CMS) Proposed Rule for the Home Health Agency Prospective Payment System, which includes the Home Health Groupings Model (HHGM).

As you may know, this proposal by CMS would drastically change the way in which home health services are paid for by Medicare. This payment reform measure would replace a 17-year payment model that could result in wide ranging affects at the provider, and most importantly, patient level.

While we understand the intention to better align Medicare Payments with care needs and patient categories, we are concerned this large payment overhaul does not accurately understand the impact it will have on patients and providers. As our main concern remains patient access, we believe this HHGM could hinder the delivery of home health services to seniors and could result in a lower quality of care or limited access to these vital services.

Home health gives seniors the ability to recover in their own homes and is commonly recognized as a cost-effective and comfortable alternative to hospital care. It would be a disservice to millions of seniors, particularly those living in rural areas where care is already limited, if the HHGM disrupts care due to this new ruling negatively impacting their local home health provider.

Specifically, it is concerning that the HHGM bases payment amounts on an untested model that has not been determined to be reliable in terms of care needs. The HHGM also replaces the historically used 60-day episodes with 30-day periods which do not align with Medicare’s 60-day standard for patient assessments and plan of care. Finally, if implemented, the resulting rule contains an extremely short time period for providers to accommodate this massive change, which could interrupt vital Medicare funding.

With this wide sweeping proposal, we call on CMS to work with the home health community on any changes to this model to ensure patients are able to maintain this critical care.
We ask that you work with stakeholders to develop a comprehensive plan that benefits seniors and provides access to home health services and to withdraw this policy in its current form. Too many Georgians and Americans depend on home care to see it disrupted.

Sincerely,

Earl L. "Buddy" Carter  
Member of Congress

A. Drew Ferguson IV, DMD  
Member of Congress

Rob Woodall  
Member of Congress

Doug Collins  
Member of Congress

Rick W. Allen  
Member of Congress

Tom Graves  
Member of Congress

Austin Scott  
Member of Congress