Centers for Medicare &

Medicaid Services, Department of

Health and Human Services, Attention:

CMS–1780–P, P.O. Box 8013, Baltimore,

MD 21244–8013.

Re: CMS–1780–P; RIN 0938–AV03

Thank you for the opportunity to provide comment on the proposed rules within “Medicare Program; Calendar Year (CY)2024 Home Health (HH) Prospective Payment System Rate Update” 88 Fed. Reg. 43654 (July 10, 2023).

[insert name of organization] provides home health services in [list states where org provides home health services]. Specifically, we serve [list primary cities and counties served]. We have been a Medicare participating home health agency since [year] and currently have a patient census of [2022 home health census]. We are very concerned about the likely impact of the proposed payment rate cuts on our ability to continue to serve individuals in our community that need home health services. As such, we hope the following information will be useful as CMS takes steps to finalize the 2024 Medicare home health services payment rates. We understand that CMS has the authority to determine the time and manner of applying any rate adjustments under the payment model, PDGM. We respectfully ask that CMS withhold the imposition of any of the proposed rate cuts in 2024 as doing so will further reduce care access in our community beyond the already reduced access.

Since 2019, we have experienced a significant reduction in our ability to serve home health patients. The proposed rate cuts will only increase the likelihood that home health services access in our community will further diminish. We have experienced unprecedented cost increases particularly in staff wages and benefits without a corresponding payment rate increase.

As a result, we have instituted already or a facing in the near-term the reduction of our service area, restrictions on patient admissions, the elimination of important community programs, and barriers to our participation in innovative programs that include taking on a shared financial risk with payers and the adoption of new technologies that require significant financial investment. The end result has been and will continue to be that patients who can be cared for at home with high quality and cost effective care will end up with costly extended stays in hospitals and nursing homes.

Our services are very valuable to the patients we serve. The reduction and loss in care access has extended hospital stays, pushed patients to institutional care, and left individuals with care. That also has negative consequences for Medicare, we ask that you not institute the proposed rate cuts and work with us to solve the problems in access that are only increasing.