



August 29, 2023

The Honorable Chiquita Brooks-LaSure
Administrator
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: Calendar Year (CY) 2024 Home Health (HH) Prospective Payment System Rate Update Proposed Rule

Dear Administrator Brooks-LaSure,

The American Academy of PAs (AAPA), on behalf of the more than 168,300 PAs (physician assistants/associates) throughout the United States, appreciates the opportunity to provide comments on the Centers for Medicare & Medicaid Services' (CMS) proposed rule CMS-1780-P relating to the 2024 Home Health (HH) Prospective Payment System Rate Update. AAPA is concerned about the proposed cut to the payment rate for home health, especially in light of payment reductions that were implemented for 2023. The Academy urges CMS to reconsider a cut of any kind, but specifically one as steep as the proposed 5.653 percent reduction on top of nearly 4 percent in cuts implemented last year, bringing the total percent in permanent cuts to more than 9 percent.¹

Slightly more than three years ago the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act," H.R. 748) was signed into law. A major part of the CARES Act was the permanent authorization of PAs and NPs to order home healthcare services for Medicare patients (consistent with state law). This greatly expanded access to home health for those who receive their healthcare from PAs and NPs. Unfortunately, the cuts proposed by CMS go against the importance placed on home health by the CARES Act. The Academy is concerned that the additional cuts will only serve to limit access to home healthcare.

Home health is increasing in popularity and preference among patients generally, but even more-so among Medicare beneficiaries. Eighty-six percent of adults and 94 percent of Medicare beneficiaries say they would prefer to receive short-term care through home health, rather than care in a nursing home following a hospital stay. In addition to patient preference, it has been demonstrated that home health saves money through

¹ Partnership for Quality Home Healthcare, "Press Release: Home Health Leaders Warn proposed Medicare Home Health Payment Rule Cuts for 2024 will Further Restrict Patient Access." June 30, 2023. Available at: <https://pqhh.org/article/home-health-leaders-warn-proposed-medicare-home-health-payment-rule-cuts-for-2024-will-further-restrict-patient-access/>. (Accessed August 17, 2023).

avoided hospitalizations and placement in skilled nursing facilities.² In Medicare’s own words, “[h]ome health care is usually less expensive, more convenient, and just as effective as care you get in a hospital or skilled nursing facility (snf).”³

The Academy urges CMS to reconsider the proposed cut of 5.653 percent, especially when considering last year’s 3.925 percent reduction. Less than a year ago, CMS was able to “recognize the potential hardship of implementing the proposed full permanent adjustment in a single year.”⁴ We ask the agency to consider the hardship of this additional, larger cut and its permanent negative impact to patient access to much-needed home health care.

Thank you for the opportunity to provide feedback on CMS-1780-P relating to the 2024 Home Health Prospective Payment System Rate Update. For any questions you may have please do not hesitate to contact me at michael@aapa.org.

Sincerely,



Michael L. Powe, Vice President
Reimbursement & Professional Advocacy

² Partnership for Quality Home Healthcare, national Association for Home Care & Hospice, “Issue Brief: Support S. 2137/H.R. 5159 to Save the Medicare Home Health Program.” August 8, 2023. Available at: https://pqhh.org/wp-content/uploads/2023/08/SaveMHH_PQHNAHC_080723.pdf. (Accessed August 17, 2023).

³ Medicare.gov, “What Medicare Covers: What’s home health care?” Available at: <https://www.medicare.gov/what-medicare-covers/whats-home-health-care>. (Accessed August 17, 2023).

⁴ 87 FR 66790, Centers for Medicare & Medicaid Services (CMS), Department of Health and Human Services (HHS), Executive Summary for the Final Rule for Medicare Home Health Payment Rates for Calendar Year 2023. At P. 66791.