January 29, 2019

Dear Chairmen Grassley, Neal and Pallone and Ranking Members Wyden, Brady and Walden:

As Congress begins the 116th session, ElevatingHOME and its members look forward to continuing our work with your respective Committees to ensure all Americans have access to affordable and quality home health, palliative, and hospice care.

ElevatingHOME, along with its subsidiary, the Visiting Nurse Associations of America (VNAA), share the mission of advancing high-quality, patient-centered health care that starts in the home. ElevatingHOME members are mission-driven home health and hospice providers serving rural, urban and underserved communities across the nation. ElevatingHOME members provide cost-effective and compassionate care to the most vulnerable individuals, including the elderly and those with disabilities.

In coming years, as historic numbers of Americans enroll in the Medicare program, home-based health care is poised to play a key role in keeping seniors healthy in wherever they call home. When surveyed, 87 percent of America’s seniors say they prefer to stay in their own home as they age and would prefer to receive medical care at home1, when possible. For seniors who experience a hospital stay, home health care is an important tool in helping patients recover and avoid another costly hospital readmission.

1 AARP, PPI, “What is Livable? Community Preferences of Older Adults,” April 2014.

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At the same time, demand continues to rise among the aging population and their families for improved access to high-quality palliative and hospice care. Palliative care and end-of-life planning allow patients and their families to determine care goals and priorities for advanced illness and offer direct care to alleviate suffering for those experiencing a life-threatening disease. Demand for quality hospice care, which provides palliative and support services to beneficiaries who are expected to live for 6 months or less, continues to grow as 1.4 million Medicare beneficiaries (or nearly 50% of decedents) received hospice care in 2016.2

Against this backdrop, ElevatingHOME urges the new Congress to focus on the following three priorities to ensure patients continue to have access to critical home health, hospice and palliative care. These priorities include:

1. Ensuring recent Medicare home health payment system reforms (Patient-Driven Groupings Model, PDGM) allow for stable and accurate payment for quality home care services;
2. Improving access to cost-effective and high-quality home care by allowing non-physician practitioners to order home care services; and
3. Providing America's seniors increased access to and knowledge about palliative and hospice care, including better tools to facilitate advanced care planning.

**Patient Driven Groupings Model (PDGM)**

In 2020, the Medicare home health prospective payment system will transition to a new Patient-Driven Groupings Model (PDGM), resulting from reforms set forth in the Bipartisan Budget Act of 2018 (P.L. 115-123). This new model will significantly shift how Medicare home health care providers are reimbursed, including new incentives related to therapy services and decreasing the episode of payment to 30 days, among other important changes. ElevatingHOME applauds your commitment to ensuring the new PDGM model is implemented in a budget neutral manner that will ensure Medicare patients continued access to critical home health services. To this end, our organization strongly requests your support of legislation – such as S. 3458, H.R. 6932 and S. 3545 introduced in the last Congress – that aim to ensure the new PDGM model is truly budget neutral and ensures any payment modifications are prospective and based solely on actual data and experience of the new PDGM system.

**Strengthen Access to Home-Care Services**

As the new PDGM model comes online, ElevatingHOME also urges Congress to adopt proposals that strengthen access to quality home health services, particularly in rural, urban, and underserved communities. For many years, our organization along with others in the home care and nursing industry, have strongly supported legislation to allow nurse clinical nurse specialists, certified nurse midwives, and physician assistants to order Medicare home health care. In many communities, non-physician providers serve as the primary care provider for Medicare beneficiaries. Unfortunately, outdated Medicare rules require practitioners to shift patients to physicians, which places undue burdens on Medicare beneficiaries, particularly in areas with limited access to doctors. ElevatingHOME urges Congress to take up legislation – such as the Home

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Health Care Planning Improvement Act (S. 445, H.R. 1825) introduced last Congress – that would allow non-physician practitioners to certify patients for critical, Medicare home health services.

**Innovation in Palliative Care**

Finally, ElevatingHOME is very encouraged by legislative proposals that aim to provide patients with new resources related to advanced care planning and that offer increased training opportunities for palliative care and other health care providers. For example, our organization strongly supported the bipartisan “Patient Choice and Quality Care Act of 2017 (S. 1334, H.R. 2797)”, which was introduced last Congress. This legislation would allow the Center for Medicare and Medicaid Innovation to test new, innovative models around advanced illness care coordination that include opportunities for Medicare beneficiaries to engage in voluntary, advanced care planning processes. We also strongly support the recently re-introduced “Palliative Care and Hospice Education and Training Act (H.R. 647)”, which would offer new educational and training opportunities for professionals in palliative care. We urge the new Congress to move forward on proposals that will increase individual’s access to palliative care and critical advanced illness planning options.

In the coming months, ElevatingHOME and its members welcome the opportunity to work with your Committees to ensure all Americans have access to quality and affordable home health, palliative and hospice services. We greatly appreciate your attention to these matters.

Please do not hesitate to contact me at DPierotti@elevatinghome.org as you continue working to strengthen the nation’s health care system.

Sincerely,

Danielle Pierotti, RN, PhD, CENP
Acting President & CEO
ElevatingHOME