



August 28, 2023

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 comments on the proposed rules within “Medicare Program; Calendar Year 2024 Home Health Prospective Payment System Rate Update” 88 Fed. Reg. 43654.

The Wisconsin Association for Home Health Care (WiAHC) and our members are very concerned about the likely impact of the proposed payment rate cuts on our ability to continue to provide home health care for individuals in our communities. 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, our members have experienced a significant reduction in our ability to serve home health patients. While there have been numerous reasons contributing to the decline in care availability, the reimbursements under PDGM are a major factor. Staff shortages have also been a big factor in that decline. We are often unable to compete for staff with other health sectors, with reduced Medicare reimbursements being the main reason. WiAHC would also urge CMS to consider the following:

- Home health care labor costs have increased at an unprecedented level. While the cost increase may have slowed in 2023, it has done so in the context of the past increases staying in place while reimbursement has not correspondingly increased consistent with our cost increases. Likewise, non-labor costs have also increased far beyond any change in payment rates.
- To address these and other financial stresses, WiAHC member agencies have had to take steps to reduce costs. However, our only real cost reduction options come at the expense of reduced care. The current financial stresses will only be exacerbated by the proposed 5.63% rate cut for 2024.
- If the proposed rate cuts are implemented in 2024, many of our members will be faced with the difficult decision on whether we remain open.

Our services are very valuable to the patients we serve. Reduced access to home health care has extended hospital stays, pushed patients to institutional care, and left individuals without care. We ask that you not institute the proposed rate cuts and work with us to solve the growing access to care challenges.

Sincerely,

Jayne Thill, MSN, BSN, RN – Board Chair
Wisconsin Association for Home Health Care