



Senator James T. Welch
Senate Chair, Joint Committee on Health Care Financing
State House, Room 416A
Boston, MA 02133

Representative Jennifer E. Benson
Acting House Chair, Joint Committee on Health Care Financing
State House, Room 236
Boston, MA 02133

May 28, 2014

Re: S.2076, An Act Relative to Home Health and Hospice Aides

Dear Chairman Welch and Chairwoman Benson:

On behalf of Commonwealth Care Alliance, a not-for-profit, consumer-governed organization and a leader in the care of those dually eligible for Medicare and Medicaid services, I am writing to request that the Joint Committee on Health Care Finance gives a favorable report to S.2076, *An Act Relative to Home Health and Hospice Aides*.

At Commonwealth Care Alliance (CCA), our mission is to provide the best possible care, tailored individually to the members we serve – elders and disabled people across the age spectrum who are eligible for MassHealth or MassHealth and Medicare together (dual eligibles). Our model of care enables thousands of people to remain living in their homes who might otherwise need to be institutionalized. For example, 75% of our members over the age of 65 qualify for nursing home care, but only 1% live in nursing homes. We accomplish this by bringing to scale proven clinical strategies that improve care and manage costs, within a team-based, consumer-directed, prepaid care delivery system.

Ensuring adherence to medication regimens is an important part of our care model for patients with chronic conditions. The legislation would allow, but not mandate, nurses in a home setting the ability and flexibility to delegate certain medication administration tasks to a certified home health aide, hospice aide, or certified nurse assistant (CNA). We are confident that our RN's and NP's can safely delegate medication administration to these qualified professionals without any compromise in the quality of care delivered. In fact, our patients who require personal care assistance currently rely on personal care attendants (PCA's) to administer their medications with consistent success. This efficiency has helped us ensure high-quality, cost-effective care and has greatly contributed to the success of our model. Ideally the language in the bill would be broader to allow for delegation from nurses to more qualified professionals, but this legislation is such a significant improvement over the current restrictions on medication administration that we offer our support enthusiastically.

Having the flexibility to delegate medication administration to home health aides will make a significant impact on our ability to provide high quality, team-based care in a cost effective way. CCA is the leader in a national model to provide effective, coordinated care to dual eligibles under the dual eligible financial alignment demonstration in the Affordable Care Act. Because dual eligibles constitute 15% of Medicaid enrollees, but account for 39% of the program's costs, this represents a huge opportunity to further our work to maintain quality while containing costs. Policy makers across the country are looking for us to succeed and we are hoping that you will make this appropriate and overdue adjustment in the laws governing medication administration to help ensure our success.

We request that you advance S.2076 favorably. Please contact our Director of Government Relations, Melissa Shannon at mshannon@commonwealthcare.org if you would like to discuss our care model or our position on this legislation further. Thank you for your attention to this important issue.

Sincerely,



Lois Simon
President