Comments of the Home Care Alliance of Massachusetts
Health Policy Commission Certification of Patient-Centered Medical Homes

On behalf of the Home Care Alliance of Massachusetts, we appreciate the opportunity to once again offer comments and feedback on the Health Policy Commission's (HPC) proposed criteria and program design for the certification of Patient-Centered Medical Homes (PCMH). The HPC staff has been open and willing to engage our organization throughout this process and we look forward to continuing to work with the Commission to ensure the involvement of home-based care.

The Home Care Alliance is a trade association of 200 home care agencies that are both Medicare-certified – authorized to provide medical services for reimbursement from Medicare and MassHealth – and privately paid supportive services.

These agencies have a longstanding history of working with physician practices to help keep patients healthy at home and out of costlier facility-based care. For the government-reimbursed services, a physician order is necessary to provide care, which includes a diverse array of services from the more traditional skilled nursing and therapies to home tele-monitoring, IV therapy, and behavioral health services – all of which come at a cost savings to the healthcare system and payers. Oftentimes, home health agencies interact with multiple physicians per patient, managing their complex medication regimens, and guiding patients and their family caregivers on a path to better manage the disease and their daily lives.

The Home Care Alliance has commented previously on the idea that PCMH practices should be connected with home health agencies that can help them manage patients in the community serving as their eyes and ears between visits. This may not be specifically what the HPC is asking for in terms of modifications for consideration, but it is an important idea for fostering true team-based care and reducing costs.

Improving the inherent processes of a physician practice is essential for positive transformation, but it is vital that other providers that are cost-efficient and high-quality be connected so that improved communication and collaboration can trickle into the patient experience.

The Home Care Alliance remains concerned that the vulnerable, homebound, medically-complex patients that we serve will find PCMH's unwilling or unable to provide the care they need. Home Care Alliance urges the HPC to require potential PCMH-certified practices demonstrate that they have agreements in places with home health agencies as a condition of certification. We further suggest that the HPC should, in these standards, positively assert that home health agencies can play a role in assisting physician practices with meeting the eventual standards. The following Priority Factors

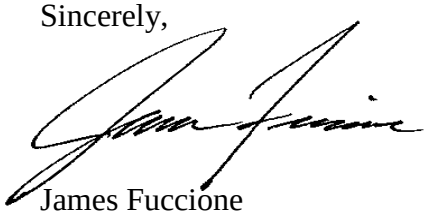
are some the Alliance suggests an experienced home health agency could assist a PCMH practice in meeting:

- At least annually, the practice obtains feedback from patients/families on their experiences with the practice and there are through qualitative means.
- Developing plans for patient self-management (Priority Factor 4.B.4)
- The practice involves patients/families/caregivers in quality improvement activities or on the practice's advisory council (Priority Factor 2.D.10)
- Proactively identifies patients with unplanned hospital admissions and ED visits (Priority Factor 5.C.1)
- Contacting patients following an ED visit (Priority Factor 5.C.4)
- The practice collects and regularly updates a comprehensive health assessment that includes depression screening using a standardized tool (Priority Factor 3.C.9)
- The practice conducts and documents a comprehensive health assessment that includes advance care planning (Priority Factor 3.C.5)
- The practice has a process for managing medications, and reviews and reconciles medications with patients/families for more than 80% of care transitions (Priority Factor 4.C.2)

We invite the HPC staff to work with our association and member agencies for details on the abovementioned factors, as well as others where home health agencies can help potential PCMH practices attain certification. The Home Care Alliance appreciates the Health Policy Commission's consideration of our comments and we look forward to working with you on these and other matters.

Please do not hesitate to contact us (jfuccione@thinkhomecare.org, 617-482-8830) with further questions.

Sincerely,



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