



On July 11, 2019, Centers for Medicare & Medicaid Services (CMS) issued the 2020 Home Health Prospective Payment System (PPS) Proposed Rule (effective January 1, 2020). While many of the provisions in the original Patient-Driven Groupings Model (PDGM) remain unchanged, the home health experts from HealthPRO® Heritage at Home offer the following summary of important updates:

**(Some) GOOD News**

The industry is buzzing with excitement about the news the HHAs may see an overall 1.3% increase in Medicare payments — or about \$250 million – in 2020.

However, CMS hasn't backed down on the behavioral adjustment and has actually proposed an *increase* to 8.01% (from 2019's 6.42%).

Therapy is also happy to learn that CMS has proposed to allow therapist assistants to perform maintenance therapy services under a maintenance program established by a qualified therapist under the home health benefit, if acting within the therapy scope of practice defined by state licensure laws.

**GOODbye to RAPs**

CMS's new goal seems to be to eliminate the current Request for Anticipated Payment (RAPs) or pre-payments for home health services at the beginning of a patient's care episode. Currently, HHAs can obtain 60% of the anticipated payment at admission through a RAP. CMS states: "there has been an increase in RAP fraud schemes perpetrated by existing home health agencies that receive significant upfront payments, never submit final claims, and then close for business." Specifically, CMS is proposing to

phase out RAP payments for new providers over the next year and eliminate them completely by 2021.

### **GOOD for Cross-Continuum IDT**

With the intention to enhance care coordination and facilitate communication between HHAs and other members of the healthcare community, CMS is proposing to adopt Standardized Patient Assessment Data Elements (SPADEs). The SPADEs will be added to the OASIS and will assess cognitive function and mental status, special services, treatments and interventions, medical conditions and comorbidities, impairments, and social determinants of health (race and ethnicity, preferred language and interpreter services, health literacy, transportation, and social isolation).

### **GOOD for Patients: Quality Reporting Program**

To encourage more focus on driving quality care, CMS intends to enhance the current home health reporting processes and make performance data more readily available to beneficiaries. CMS expects that all data related to quality and performance for Value-Based Purchasing Model (VBPM) will be made public after December 2011, following the completion of the CY 2020 Annual Report appeals process and the issuance of the final Annual Report to each HHA.

Specifically, the Proposed Rule outlines:

- The use of Total Performance Scores (TPS) and TPS Percentile Ranking for the HHAs in nine states who have been participating in the VBPM demo since its launch in January 2016. (The objective of the demo is to tie payment to certain quality metrics, with upward or downward adjustments depending on performance. In 2019, for example, home health providers in the participating states were exposed to a maximum adjustment of 5%. In 2020, that adjustment rises to 6%, with a 1% annual increase in 2021 and 2022.
- The addition of two new Quality Measures (QMs) to the existing 19 QMs that are publicly reported on Home Health Compare's website. New QMs that assess the transfer of health information and are intended to ensure patient medication lists are accurate/complete at discharge/transfer:
  - Transfer of Health Information to Provider-Post-Acute Care
  - Transfer of Health Information to Patient-Post-Acute Care

HealthPRO® Heritage at Home's focus is in providing resources, education, and support to home health agencies preparing for PDGM. Our experts are here to help you prepare, execute, and succeed.

Contact us with your questions. Reach out to us for perspective: [homehealth@healthpro-heritage.com](mailto:homehealth@healthpro-heritage.com)

Read the full CY 2020 Home Health PPS Proposed Rule: <https://www.federalregister.gov/public-inspection/current>