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From: **Elizabeth Weglein** <ew@elizabethcooneyagency.com>

Date: Sat, Feb 20, 2016 at 4:29 PM

Subject: COMAR 10.24.16 Proposed Regs

To: cathy.weiss@maryland.gov

Cc: ew@elizabethcooneyagency.com

Dear Cathy,

This is our formal response to the proposed permanent regulations for the Home Health Agency Services under the State Health Plan for Facilities and Services COMAR 10.24.16.

We are in support of the proposed permanent regulations as drafted with one modification:

10.24.16

D. Quality Measures for Licensed and Accredited Hospital, Nursing Home, or Maryland Residential Service Agency (RSA) providing Skilled Nursing Services.

(1) In the case of a Maryland licensed RSA applicant, it has operated with an established quality assurance program that includes systematic collection of process and outcome measures and experience of care measures and has maintained accreditation through a deeming authority recognized by Maryland's Department of Health and Mental Hygiene for a least (**CHANGE**) **ONE MOST RECENT CALENDAR YEAR;**

Comment:

Most RSAs are not accredited since the current OHCQ do not require a deeming mechanism for licensure. One year of successful accreditation should be substantial to demonstrate their ability to measure and maintain outcomes. We believe the remainder of the proposed draft regulations create and substantive threshold within the regulations to qualify an applicant candidate with one year of approved accreditation.

Thank you for the opportunity to submit our comments.

Many thanks,
Elizabeth Weglein

Elizabeth Weglein, CEO

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