



Maryland-National Capital Homecare Association

Home Health | Private Duty | Durable Medical Equipment

August 20, 2021

Delivered via email to Cathy Weiss -MDH- cathy.weiss@maryland.gov

Cathy S. Weiss
Program Manager
Center for Health Care Facilities Planning and Development
Long Term Care Policy and Planning
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

Dear Ms. Weiss:

MNCHA would like to thank MHCC for giving us the opportunity to respond to the proposal, "Expanding Opportunities for Delivery of Quality Home Health Agency Services in Maryland."

MNCHA supports MHCC's move towards including quality measures in its CON application process but feels that there are some points to be addressed and taken into consideration: They include:

- There has been a pause on the collection of quality data and therefore the most current CMS scores are based on 2019 (12 months) data. There have likely been many changes effecting scores since then.
- Using the CMS quality/service scores at a point in time may discourage high quality agencies from acquiring lower quality agencies. An example is if a five-star agency that acquires a one-star agency. If the acquisition causes the combined average star rating to be below the state's proposed four-star threshold, this may impact the high-quality agency's ability to expand further when the next CON application measurement is taken. Some consideration should be given in these instances so the higher quality acquiring agencies are not penalized for taking on a poorly performing agency.
- Consider allowing agencies to voluntarily use data analytics such as those provided by Strategic Health Partners for more real-time quality and service data

MNCHA Home Health providers are available if you would like to have further discussion on this topic.

If you have any questions, please feel free to reach out to me at dseek@mncha.org, or 410-980-1635.

Sincerely,

Dawn Seek
Executive Director