

Comparison of Proposals for Home Health Payment and Regulatory Reform - October 2009

H.R. 3200	H.R. 3200 SCORE	NAHC Proposal	Estimated NAHC SCORE *	America's Healthy Future Act of 2009 (Senate Finance Chairman's Mark)	America's Healthy Future Act of 2009 SCORE
1. No provision	No provision	1. Cap aggregate outlier at 2.5% Cap individual outlier at 10%	(\$6.8B)	1. Same as NAHC Proposal	(\$6.8B)
2. Reduce post acute provider payments for hospital readmissions (Sec. 1151)	A portion of (\$19.1 B)	2. No provision	No provision	2. Hospital only provision	
3. Post acute care bundling pilot (Sec. 1152)	\$0B	3. No provision	No provision	3. Post acute pilot program	
4. Set Market Basket Index update at 0% for 2010 (Sec. 1153)	(\$7.7B)	4. Set update at Market Basket Index - 1.0% for 2010, 2011, 2012	(\$7.7B)	4. Set update at Market Basket Index - 1.0% for 2011 and 2012	Included in \$31.2B estimate below
5. Rebase in 2011 with a 5% reduction guaranteed Not tied to a specific cost report year No budget neutrality policy No rural add-on Combine 2010 and 2011 case mix creep reductions in 2010 No due diligence for CMS (Sec. 1154)	(\$34.2B)	5. Rebase starting in 2015 phasing in through 2016 Based on cost reports from 2010 Set at costs plus 5% Standards enumerated on included costs Budget neutrality policy 3% rural add-on from 2010-2015 Prohibits case mix acceleration "Due diligence" process for CMS	(\$17.5B)	5. Rebase starting in 2013 phasing in through 2016 Based on cost reports from 2010 3% rural add-on from 2010-2015 Rebasing adjustment would be limited to no more than a 3.5% per year	(\$31.2B)
6. Productivity adjustments start in 2010 (Sec. 1155)	(\$14.9B)	6. Productivity adjustments beginning 2017	(\$2.6B)	6. Productivity adjustments beginning in 2015	(\$5.7B)
7. No provision	No provision	7. Coordinated hospital/home health discharge planning for COPD, CHF, diabetes	Potential (\$8-15B)	7. No provision	
8. Telehealth provision is unspecified for Secretary to determine (Sec. 1191)	\$0B	8. Remote telehealth pilot program	Unknown	8. Opportunities through new CMS Innovation Center but no guarantees	
9. Participating physician requirement (Sec. 1637)	Unknown	9. No provision	No provision	9. No provision	
10. Face-to-face physician encounter requirement for certification of eligibility for home health services and condition of payment (Sec. 1639)		10. No provision	No provision	10. Face-to-face physician encounter requirement for certification of eligibility for home health services and condition of payment	
11. No provision	No provision	11. Home Health Agency Chronic Care Management Demo	\$0B	11. Home Health Agency Chronic Care Management Demo	\$0B
12. No provision	No provision	12. Require background screening and competency credentialing of home health agency owners and managers	\$0B	12. No provision	
13. No provision	No provision	13. 2 year moratorium on new home health agencies	(\$0.2B)	13. No provision	
14. No provision	No provision	14. Vulnerable patient support and study	.5B	14. Vulnerable patient support and study	.5B
TOTAL	(\$56.8B)	TOTAL	(\$34.3B) (plus #7)	TOTAL	(\$43.2B)

* As estimated by Dobson DaVanzo & Associates, LLC