



July 26, 2021

Director Liz Matney
Iowa Medicaid Enterprise
Iowa Department of Human Services
Attn: Medicaid Home Health Low Utilization Payment Adjustment
1305 E. Walnut Street
Des Moines, IA 50319

RE: Iowa's State Plan Amendment (SPA) IA-21-013: Medicaid Home Health Low Utilization Payment Adjustment (LUPA) Rates, published on June 24, 2021

Submitted electronically via

Dear Director Matney,

UnityPoint at Home appreciates this opportunity to provide comments on the *Iowa's State Plan Amendment 21-03: Medicaid Home Health Low Utilization Payment Adjustment (LUPA) Rates*. UnityPoint at Home is the Home Health Agency affiliated with UnityPoint Health, Iowa's largest and one of the nation's most integrated health care systems. UnityPoint at Home offers a diverse set of programs: traditional home health, durable medical equipment, pharmacy, palliative care, hospice care, and (in certain locales) public health. In addition, UnityPoint at Home is committed to payment reform and is actively engaged in numerous initiatives which support population health and value-based care. Among these initiatives, UnityPoint at Home is an Accountable Care Organization (ACO) Participant in the Centers for Medicare and Medicaid Innovation (CMMI) Next Generation ACO Model, is participating in the Home Health Value-Based Purchasing (HHVBP) Model in Iowa, and is a CMMI Medicare Care Choices Model awardee in three Iowa regions.

As Iowa's largest fully integrated health system, UnityPoint Health provides services to Medicaid patients in all 99 Iowa counties. As an active partner in Iowa's health, UnityPoint at Home appreciates the time and effort of Iowa Department of Human Services (DHS) and Iowa Medicaid Enterprise (IME) in developing and ultimately proposing a State Plan Amendment (SPA). UnityPoint at Home respectfully offers the following comments.

HOME HEALTH PAYMENT METHODOLOGIES & RATES

With an effective date of July 1, 2021, Iowa DHS is proposing changes to the reimbursement rates for home health intermittent services by enrolled home health providers. These changes include the continuation of reimbursement rates for home health agencies based on the Medicare LUPA methodology and state geographic wage adjustments through \$2,000,000 state appropriated funding. DHS will continue to update rates every two years to reflect the most recent Medicare LUPA rates.

Comment: *During the COVID-19 pandemic, home health agencies have been under increased pressure to deliver more care within the preferred care setting – a patient’s own home. In order to continue to survive and thrive, home health agencies must be appropriately reimbursed.* The Centers for Medicare and Medicaid Services (CMS) have recognized this fact and have established a LUPA rate. We appreciate that IME has included a LUPA rate increase within this SPA, which is an important first step in elevating rates to the full level recognized by CMS as appropriate and needed to sustain quality home health services to patients. LUPA rates enable services for our rural residents with distance/travel barriers as well as our most vulnerable residents with challenging needs. Enhanced LUPA rates positively impact nonprofit home health providers, like UnityPoint at Home, who disproportionately care for more challenging populations, including those with acute medical needs and complex conditions. Despite UnityPoint at Home’s more acute population, our outcomes are strong and patient satisfaction rates are high.

UnityPoint at Home supports the proposed SPA. It is directionally correct and makes progress towards the full CMS LUPA rate. The \$2 million will help UnityPoint at Home and other home health agencies to continue to provide high-quality care. Overall, the additional funding would help solidify sustainability of the Medicaid Home Health benefit.

GENERAL COMMENTS

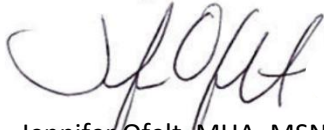
CMS continues to emphasize the importance of pushing care to community settings, including home health services. An example is when CMS announced the Acute Hospital Care at Home waiver in November of 2020, which built upon the Hospital without Walls program.

Comment: UnityPoint at Home encourages IME to continue to support innovation and value-based arrangements in the home health space. UnityPoint Health, under the leadership of UnityPoint at Home, is one of the first six health systems with extensive experience providing acute hospital care at home that was approved for the new CMS waiver. UnityPoint at Home engaged with Iowa’s Department of Human Services to assure state compliance when implementing this waiver. We are pleased to report that UnityPoint at Home was the first to bill and be reimbursed for a patient under this waiver. By shifting care to home with the proper supports, we have maintained high patient satisfaction rates as well as achieved outstanding clinical outcomes, including extremely low readmission rates. This was accomplished through a post-acute care bundling strategy in which appropriate services are wrapped around the patient. Our bundles include a hospital to home (2-hour response time), primary care at home (4-hour response time), palliative care at home, and skilled nursing facility at home. While we recognize that this waiver came into being as a result of the COVID-19 pandemic, its efficacy beyond the pandemic is undeniable. This program is a difference maker. As a national leader, ***UnityPoint at Home is in discussions with CMS about the future of the Acute Hospital Care at Home program as well as is encouraging CMS to consider expanding the suite of post-acute care bundles to drive improved health outcomes, heightened patient satisfaction and reduced health care costs. UnityPoint at Home urges IME to consider similar innovations for its Medicaid populations.***

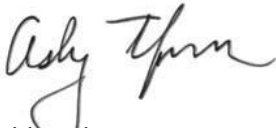
SPA IA-21-013: Medicaid Home Health LUPA Rates
UnityPoint at Home

UnityPoint at Home appreciates the opportunity to provide input on *Iowa's SPA: Home Health LUPA Rates* and its impact on UnityPoint Health®, UnityPoint at Home® and our patients and communities served. To discuss our comments or for additional information on any of the addressed topics, please contact Ashley Thompson, Director of Government & External Affairs, at (515)537-6089 or Ashley.Thompson@unitypoint.org.

Sincerely,



Jennifer Ofelt, MHA, MSN, RN
Chief Operating Officer



Ashley Thompson, MPH
Director of Government & External Affairs