



March 18, 2016

Diane Peterson
NH Department of Health and Human Services
Office of Medicaid Business and Policy
129 Pleasant Street
Concord, NH 03301

Ms. Peterson,

I am writing on behalf of the Granite State Home Health Association -- a non-profit organization which advocates on behalf of licensed home care agencies and the people they serve. **The Association supports the proposed State Plan Amendment that revises the fee schedule for Medicaid Private Duty Nursing (PDN) services.**

The amendment changes the fee schedule methodology from a flat per-hour rate for visits by RNs and LPNs to a more realistic fee schedule that includes rate differentials for day/evening visits, night/weekend visits and intensive services for patients with complex medical needs. In addition to this change in methodology, NH Medicaid has notified PDN providers that rates will increase on April 1, 2016.

The current Private Duty Nursing rates have not been updated since July 1, 2006 and no longer adequately reimburse agencies for the full cost associated with providing care to patients eligible for PDN services. Agency costs include: wages/salaries, supervision and support of nurses, individualized staff training to the specific needs of each patient, discharge planning with acute care providers and patients' personal caregivers, administrative resources for MCO prior authorizations, payroll taxes, workers' compensation and liability insurance, and ACA employer mandates. Because the rates have not been adjusted in nearly 10 years, home care agencies can no longer offer competitive wages necessary to recruit and retain nurses. Many families have reported that access to PDN services has been severely jeopardized. The new methodology and revised rates are a positive step that will hopefully improve the ability of home care agencies to recruit and retain nurses and enable agencies to fulfill unmet patient needs.

There are other factors that also impact access to care, including the aging of the nursing workforce and fewer graduating nurses entering the home care field. The Association will work with NH DHHS and an anticipated Legislative Commission to explore potential solutions.

The Granite State Home Health Association applauds NH Medicaid for addressing the Private Duty Nursing access crisis through this proposed State Plan Amendment. We urge NH Medicaid to also revise fee schedules for regular State Plan-mandated home health services in the near future, as those rates have not been updated annually since 2010, as required by NH RSA 126-A:18-a.

Respectfully,

A handwritten signature in blue ink, appearing to read "Gina Balkus", is written over a light blue horizontal line.

Gina Balkus
Chief Executive Officer