n4a RELEASES DRAFT COMMENTS ON CMS DISCHARGE PLANNING REQUIREMENTS
Encourages Agencies to Submit Their Own

December 30, 2015

n4a is releasing our draft comment letter in response to the recently proposed CMS rule to update discharge planning requirements that Hospitals, including Long-Term Care Hospitals, Inpatient Rehabilitation Hospitals, Critical Access Hospitals and Home Health Agencies, must follow in order to participate in Medicare and Medicaid.

These comments were based largely on feedback from n4a members in response to our request for information earlier this month about how the proposed changes may affect the ability of Area Agencies on Aging to support older adults and people with disabilities during hospital discharge and care transition processes.

We believe that several components of the proposed rule may be of particular importance to AAAs, ADRCs and other community-based organizations that are participating in these activities with hospitals and other health care providers. In particular, we are concerned about the recommendation, but not requirement, that acute and post-acute care providers collaborate with AAAs and other CBOs during the discharge planning process, and the lack of clarification about if or how HCBS providers would be adequately compensated for supporting discharged Medicare and Medicaid patients. We are also concerned about how updated discharge planning requirements could impact ongoing care transitions efforts under the CMS-led Community-Based Care Transitions Program (CCTP) and through privately contracted agreements with health care providers. Our concerns are detailed in our draft comments; a final version of which n4a will submit on January 4.

Action Requested #1: We strongly encourage AAAs to submit comments if you share these or other concerns. If your agency plans to submit comments, feel free to use n4a’s draft as a template. Keep in mind that your comments do not need to be lengthy. Most importantly, they should emphasize your agency’s individual experiences with these issues and how you believe the proposed regulations would affect your relationships with patients, caregivers, hospitals and other health care providers in your community. If your agency does submit comments, please send us a copy c/o of Autumn Campbell (acampbell@n4a.org).

Action Requested #2: n4a’s comments have not been submitted yet, so we also welcome your feedback on n4a’s draft letter by Noon on Monday, January 4. Please contact Autumn Campbell (acampbell@n4a.org) if you have additional questions about or input on our comments.
Comments are due by 5:00 p.m. on Monday, January 4. The draft regulations as well as information about how to submit comments are available at: http://federalregister.gov/a/2015-27840.

If you have questions or concerns about this Advocacy Alert or n4a’s policy positions, please contact Autumn Campbell at acampbell@n4a.org and Amy Gotwals at agotwals@n4a.org.