

March 8, 2018

Honorable Greg Waldon
Chairman
Energy & Commerce Committee
2123 Rayburn House Office Building
Washington, DC 20515

Honorable Frank Pallone
Ranking Member
Energy & Commerce Committee
2322A Rayburn House Office Building
Washington, DC 20515

Honorable Michael C. Burgess
Chairman
Health Subcommittee
2123 Rayburn House Office Building
Washington, DC 20515

Honorable Gene Green
Ranking Member
Health Subcommittee
2322A Rayburn House Office Building
Washington, DC 20515

Dear Chairmen and Ranking Members,

We, the undersigned Long-Term Acute Care Hospitals (LTCHs), respectively request that you wait to move forward on any post-acute care unified payment policy until all reports required by the Improving Medicare Post-Acute Care Transformation Act of 2014 (IMPACT Act), Public Law 113–185, are delivered to Congress.

Our group represents not-for-profit LTCHs of varying sizes from across the United States who collectively serve thousands of Medicare patients with the most complex care needs. We deliver care to diverse populations ranging in age, socio-economic background, and regions of the country --both urban and rural settings. As we pride ourselves on our expertise with high acuity patients, we only take patients meeting LTCH criteria, and we maintain the highest level of care and standing in our facilities. Our member LTCHs regularly meet to share “best practices,” and offer a distinctive, united opinion on the proposed post-acute care policies.

Recently, government and outside groups have suggested that Congress could, and should, move forward with a proposed interim unified post-acute care payment system. The IMPACT Act requires submission of standardized data across post-acute care settings to compare quality leading to an updated payment system. As with most facilities within the post-acute care space, we comply with these submission requirements. Both the Centers for Medicare and Medicaid Services (CMS) and the Medicare Payment Advisory Commission (MedPAC) will utilize the collected data to deliver a final report to Congress on a proposed unified prospective payment system for post-acute care settings 5-years following the enactment of the IMPACT, or 2022. We are in agreement with the objective of proper payment for quality health care that is equitable across all settings however, the constant and conflicting changes in policy over the past decade has led to enormous uncertainty for our future resource needs. We strongly urge you to wait for these final reports from CMS and MedPAC rather than moving forward with any interim legislative overhaul of the post-acute payment system, so that any new system fully takes into account current data, quality, outcomes, acuity levels, and sites of service.

We appreciate your consideration of our observations for the future of a unified post-acute payment system. Please use us as a resource as you continue the legislative process.

Sincerely,

Asheville Specialty Hospital
Asheville, NC

Aultman Specialty Hospital
Canton, OH

Carolinas ContinueCARE Hospital
at Kings Mountain
Kings Mountain, NC

Carolinas ContinueCARE Hospital
at Pineville
Charlotte, NC

Carolinas ContinueCARE Hospital
at University
Charlotte, NC

ContinueCARE Hospital
at Baptist Health Corbin
Corbin, KY

ContinueCARE Hospital
at Baptist Health Masisonville
Madisonville, KY

Continue CARE Hospital
at Baptist Health Paducah
Paducah, KY

ContinueCARE Hospital at Hendrick
Medical Center Abilene, TX

ContinueCARE Hospital at Medical Center
Odessa, TX

ContinueCARE Hospital
at Midland Memorial
Midland, Texas

ContinueCARE Hospital
at Palmetto Health Baptist
Columbia, SC

Continuing Care Hospital,
KentuckyOne Health
Lexington, KY

Craig Hospital
Denver, CO

Gaylord Specialty Healthcare
Wallingford, CT

HealthEast Bethesda Hospital
St. Paul, MN

Henry Ford Allegiance Specialty Hospital
Jackson, MI

Presence Holy Family Medical Center
Des Plaines, IL

Regional Hospital for Respiratory and
Complex Care - CHI Franciscan
Seattle, WA

Shepherd Center
Atlanta, GA

Tyler ContinueCARE Hospital
Tyler, TX