



July 19, 2020

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1730-P
P.O. Box 8013
Baltimore, Maryland 21244-8013

Submitted electronically via <http://www.regulations.gov>.

To Whom It May Concern:

The Rural Policy Research Institute Health Panel (Panel) was established in 1993 to provide science-based, objective policy analysis to federal policy makers. The Panel is pleased to offer comments in response to the proposed updates in the CY 2021 Home Health Prospective Payment System Rate proposed rule. Our comments are limited to rural-specific issues and are structured to parallel questions posed, or issues stated, by CMS (not technical comments regarding specific sections of the proposed rule).

Creating Permanent Telehealth Solutions Improves Rural Access to Care

The Panel is encouraged by CMS' efforts to look for permanent solutions arising out of the challenges presented by the global COVID-19 pandemic. Unlocking the full potential of telehealth as a supplement to community-based care providers by making changes to payment and regulatory policy permanent is especially promising for the future of rural health (see FR 39427).

In rural areas, telehealth services help to increase access to home health services patients may otherwise forego due to challenges they face accessing care, including among other factors, cost. Generally, there is a shortage of home health care in rural areas, and making the proposed changes to home health delivery through digital technologies may help alleviate some of these access challenges. Adopting the proposed plan of care approach to deliver home health services with the option of digital technology will provide greater flexibility for both patients and home health providers. Patients can maintain their in-person visits if preferred but have more options for telehealth service delivery if they elect to do so. Providers may potentially enjoy greater cost savings through reduced travel expenses, for example.

The Panel supports CMS' proposed changes to make permanent the home health telehealth rules initially implemented to combat the pandemic. These changes will allow greater access to care in rural areas. The Panel encourages CMS and other agencies to continue exploring additional avenues for increased use of telehealth that can expand access to care for rural populations.

Sincerely,

The Rural Policy Research Institute Health Panel

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