



American Hospital  
Association®

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February 6, 2018

Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Hubert H. Humphrey Building  
Mail Stop 314-G  
200 Independence Avenue, S.W.  
Washington, DC 20201

John R. Graham  
Acting Assistant Secretary for  
Planning and Evaluation  
Hubert H. Humphrey Building  
Room 415F  
200 Independence Avenue, S.W.  
Washington, DC 20201

***Re: Request for CMS and ASPE to convene technical expert panels during the development of the post-acute care prospective payment system model.***

Dear Ms. Verma and Mr. Graham:

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations – including 3,300 post-acute care members – we want to reiterate the interest of the American Hospital Association (AHA) to engage in and provide feedback on the work that the Centers for Medicare & Medicaid Services (CMS) and the Assistant Secretary for Planning and Evaluation (ASPE) are undertaking to develop a unified post-acute care prospective payment system (PAC PPS). Our post-acute care membership includes 267 long-term care hospitals (LTCHs), 1,159 inpatient rehabilitation facilities (IRFs), 761 skilled-nursing facilities (SNFs), and 896 hospital-based home health (HH) agencies. The current CMS and ASPE work to build a common payment system for these four settings, as mandated by the Improving Medicare Post-Acute Care Transformation Act of 2014, is of great importance to them and to the AHA.

In November 2016, the AHA made [six recommendations](#) to CMS and ASPE for your consideration as you proceed with your work. One of these recommendations was for your agencies to ensure a transparent PAC PPS development process. In pursuit of this, the AHA requests that technical expert panels (TEPs) be convened to allow stakeholders to weigh in and be briefed on the new model. Through its development, we ask that you convene at least three TEPs, which would be consistent with the process CMS used to develop the alternative SNF PPS payment model known as “RCS-1.” To ensure that the field is informed and has the opportunity to weigh in throughout the lengthy process, we specifically request that the first such TEP be convened in 2018.



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Thank you for considering this request. Please contact me if you have questions or feel free to have a member of your team contact Rochelle Archuleta, director of policy, at [rarchuleta@aha.org](mailto:rarchuleta@aha.org).

Sincerely,

Thomas P. Nickels  
Executive Vice President