

# DOH Listening Session Comments Home Health Certificate of Need

1-31-2023

# Shortcomings of the Existing Model

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- Need is based on visits but not patients served
- Visits are calculated using an algorithm with no known basis
- At 10,000 visits per agency, DOH sets a MAXIMUM size vs. a MINIMUM size for providers
- 10,000 visits annually is approximately 50 admissions per month
- There are only 7 HHAs in Washington that provide 10,000 or fewer visits annually

# Proposed CON Need Calculation

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# Key Considerations for DOH

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For a new model to be considered it must be:

- Simple to Administer
- Data is Publicly Available

# Utilization Based Need Model

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Utilization = patients served per 1,000 population

# Advantages of a Utilization Based Model

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- Data is available
- It is a simple calculation
- Focus on patients served
- Utilization is a composite measure that is affected by access, efficiency, quality, and patient satisfaction
- Ability to set a MINIMUM agency size

# Other Recommendations

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- The supply side of any calculation only includes Medicare certified agencies.
- The new model continues to use rolling review vs. concurrent review.

# Contact Information

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**Marc Berg**

marc@bergdatasolutions.com

360-518-3226

**Leslie Emerick**

lesemerick@lkemerick.com

360-280-6142

**Shelly McDiarmid**

SMMcDiarmid@evergreenhealth.org

360-899-2178