



March 19, 2024

To Whom It May Concern:

The Pennsylvania Homecare Association would like to commend Governor Shapiro, the Pennsylvania Long-Term Care Council, and the Pennsylvania Department of Aging for their commitment to assess and make improvements to meet the unique needs of the older adult population in Pennsylvania.

The Pennsylvania Homecare Association (PHA) is a non-profit trade association representing more than 700 home health, home care (personal care), and hospice providers across the state of Pennsylvania. The association's mission is to support the provider community in the effort to bring care home. Home is the most preferred and cost-effective setting for care as we age. We commend the *Aging Our Way, PA* plan for recognizing the importance of home-based care in the healthcare continuum and acknowledging the critical need to improve caregiver supports and strengthen the direct care workforce, which makes access to quality in-home care possible. Additionally, the plan directly addresses the need for improved caregiver supports to strengthen the workforce that directly impacts quality of care for so many Pennsylvanians.

PHA is supportive of the priorities and strategy outlined in *Aging Our Way, PA*. Specifically, PHA appreciates the plan's efforts to create and support community infrastructure and outdoor public spaces, as the ability to engage in activities outside of the home is a critical piece of providing community-based care. By investing in these options, the industry will have additional resources to create meaningful and joyful interactions in safe and beautiful settings – enhancing overall happiness, social engagement, and quality of life of our older adults.

To further elevate the opportunities for older adults to engage in the community, PHA recommends the following areas for consideration to enhance the infrastructure, policies, and practices that are in place today.

1. Access to Home and Community-Based Care (HCBS): Removing barriers to accessing home-based care is critical to the ability to age in the community. Today's long-term services and support (LTSS) program has a fragmented and lengthy approval process, which includes involvement and approval from a local County Assistance Office, the state appointed Independent Enrollment Broker (IEB), a Primary Care Physician, a contracted party for conducting level of care needs assessments, a managed care organization, a case management or supports coordination organization, a home and

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community-based provider organization, and in many cases legal representation or community consultants to support the individual through the complicated application process. The number of points in which the system can falter, or break, are many, leaving a significant number of Pennsylvanians waiting multiple months to access care. Unfortunately, we see too often that the need for care is urgent, and lengthy wait times for these services deters the population or leaves them with no choice but to explore more costly facility-based care. PHA recommends the following to address this:

- a. Consider the coordination of nursing home transitions, where home adaptations are completed, yet patients stay in a facility awaiting the availability of a caregiver or a nurse who can commit to providing essential services to keep that individual at home. Strategies to improving access to housing are one part of a larger network of collaboration that must occur to keep people home.
 - b. Conduct stakeholder interviews to assess the HCBS enrollment process and identify areas to improve efficiency, apply automations, and encourage ongoing public reporting of wait times from initial point of contact with an IEB to start of care.
 - c. Encourage HCBS services to allow “deemed status,” or presumptive eligibility. Deemed status is used today in nursing facilities across Pennsylvania. Deemed status would allow a provider to identify clinical and financial appropriateness for an HCBS service *prior* to receiving official eligibility through the state. This process significantly reduces waiting times to gain access to an HCBS benefit. Furthermore, deemed status would allow Medicaid funds to be rebalanced from more costly facility-based settings.
 - d. Consider programs and funding sources to address the population in Pennsylvania that do not qualify for Medicaid HCBS, but also cannot afford private care. The Pennsylvania Home Care association supports the Foundation for Home Care and Hospice Services, which supplies one time/calendar year grant opportunities of 50 hours of care to support populations who do not qualify for Medicaid HCBS services, home health services, or hospice care. Programs like these fill a significant gap in Pennsylvania providing preventative care that too often results in costly ER and clinical interventions.
2. The plan puts forth the priority to educate caregivers on available transportation options. The association supports this effort. However, we would like to acknowledge that transportation services are sometimes unreliable – failing to arrive for scheduled healthcare appointments or resulting in a patient waiting hours at a doctor’s office waiting for transportation pickups. This is especially challenging in rural areas. PHA suggests the plan:
 - a. Acknowledge the role that paid caregivers play in transportation. Whether providing the transportation service in their own vehicle or attending appointments with patients on public transportation. Mileage is most often **not** reimbursed to caregivers, even if the caregiver’s transport is the preferred or

only option. Pre-authorized mileage to attend preventative care visits in areas where transportation is unavailable or unreliable should be considered. Please note that mileage is a reimbursable expense in PA's Office of Developmental Programs for home and community-based services.

- b. Consider the benefits of socialization in a community setting for older adults. How Pennsylvanians access these community areas is often a caregiver's responsibility. Empower caregivers to engage older adults in social activities by acknowledging and reimbursing them adequately.
3. Finally, the Pennsylvania Homecare Association commends *Aging Our Way, PA* in perfectly capturing the challenges faced by the caregiver community, specifically stating: *"The emotionally and physically demanding work of caregivers is neither adequately recognized nor supported in ways that ensures that this high-quality care is sustainable. Like many states, Pennsylvania is confronted with a shortage of direct care workers and staggering job turnover rates. Low wages, minimal onboarding, and limited growth prospects stifles the recruitment and retainment of a well-trained, consistent direct care workforce."* However, the identified six strategies to address this challenge are not sufficient for a 10-year plan to support this population. PHA recommends the following additions:
- a. Establish a regular cadence of rate reviews for HCBS (specifically Nursing, Home Health Aide, Personal Assistance Services and Respite Care) that ensures the industry can invest funds 1. Into the hands of caregivers, 2. Into training and education for retention and quality of care, and 3. Into programs such as 401k, Employee Assistance Programs, and more to support the caregiver population in their work and home life.
 - b. Take immediate action to address the inadequate reimbursement rates for caregiver programs in Pennsylvania. Pennsylvania is woefully under-investing in these critical healthcare services by more than \$4.00/hour compared to our neighboring states of Delaware, Maryland, New York, and New Jersey.
 - c. Support recognition and appreciation initiatives run by non-profits and PHA, such as the Annual Direct Care Worker of the Year Forum, which recognizes direct care workers who display industry excellence. Each year, PHA receives hundreds of nominations from across the state. This annual awards program has been historically supported by the Department of Aging; however, in recent years, the Department has stopped supporting this program financially. Having the Department's support in such an important day of recognition is meaningful to both providers and caregivers, as studies show recognition and appreciation rank within the top three reasons caregivers stay at an employer organization. caregivers list recognition and appreciation
 - d. Support the PHA with grants aimed at expanding caregiver training programs on *My Learning Center*, an online **free** learning management system, as well as on-



site classroom training sessions in collaboration with providers and training facilities across the state.

PHA and its provider organizations commend the effort and stakeholder engagement in developing *Aging Our Way, PA*. The Pennsylvania Homecare Association would be honored to collaborate on any initiatives to further this effort in the coming months and years. Please do not hesitate to call on us for support.

Sincerely,

A handwritten signature in cursive script, reading 'Mia Haney', is positioned below the word 'Sincerely,'.

Mia Haney, CEO
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bringing *care home*

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