June 22, 2020

The Honorable Mark Takano  
Chairman  
House Veterans Affairs Committee  
B234 Longworth HOB  
Washington, DC 20515

The Honorable Phil Roe  
Ranking Member  
House Veterans Affairs Committee  
B234 Longworth HOB  
Washington, DC 20515

The Honorable Jerry Moran  
Chairman  
Senate Veterans Affairs Committee  
412 Russell SOB  
Washington, DC 20510

The Honorable Jon Tester  
Ranking Member  
Senate Veterans Affairs Committee  
412 Russell SOB  
Washington, DC 20510

Dear Chairman Takano, Ranking Member Roe, Chairman Moran, and Ranking Member Tester:

I write today on behalf of members of the Home Care Association of America (HCAOA) to highlight concerns of home care providers who are attempting to care for our nation’s veterans throughout the United States. HCAOA urges the House and Senate Veterans Affairs Committee to hold a special hearing to specifically address the challenges that exist in providing home care services at this time.

During these challenging days, home care providers remain on the frontlines caring for veterans despite the risks of contracting the coronavirus (COVID-19). However, other challenges make it difficult for our home care agencies to keep providing services to veterans. Below are three issues that have come up in the past year that present challenges.

**Personal Protective Equipment:** Section 20009 of the Coronavirus Aid, Relief, and Economic Security Act” or the “CARES Act,” requires the VA to provide its direct care workforce, including contractors, with appropriate personal protective equipment (PPE) when working with veterans. HCAOA appreciated the open dialogue we have had with the staff at the VA on this issue. However, the response to this requirement continues to be in development. HCAOA does not believe that the VA should be procuring PPE materials for contracted home care providers. Instead, we have urged the VA to reimburse the provider for their PPE costs through the fee schedule. Such a policy will prevent the
VA from competing with home care providers for PPE supplies, which would simply drive up the price. Also, it is not a costly item, and something the VA could quickly reimburse providers for regularly.

**Home Care Fee Schedule:** The VA posted an updated fee schedule for 2020, and its rates are effective for services on or after 10/1/2019. However, the fee schedule was published several months late with very little or no guidance. Many home care providers were not aware an updated fee schedule had been issued, and so they continued to bill the VA at the lower rate. The VA has indicated there is nothing they can do to remedy the concern as the VA pays the lesser of what is charged or the fee schedule rate.

HCAOA believes that reforms are needed to ensure that home care providers are informed of policy and fee schedule changes that may alter their ability to serve veterans. To achieve this and other reforms, we request a hearing to more fully discuss the challenges home care providers are having.

**Medicare-Certification for Home Care Providers:** Finally, I want to take a moment to thank the VA for working with HCAOA to address a long-standing concern. The passage of the VA Mission Act created some confusion for VA facilities in that they believed home care providers would need to be Medicare-certified to provide home care for a veteran. Such a policy has never been a requirement and is not a requirement today for home care delivery. Yet it took over a year to get this issue remedied by the VA headquarters, during which time many home care contracts with our members were canceled. While we appreciate the ongoing efforts of the VA staff, who are under-resourced in the area of home care, too many veterans and home care providers were impacted by slow progress on a critical policy question. HCAOA believes we can do better and would recommend the Congress establish a formal committee of home care stakeholders, including veterans, to advise and guide the VA on critical policies.

Thank you for your consideration of our request for a hearing. We are eager to share our thoughts and improve care for veterans.

Sincerely,

Vicki Hoak,
Executive Director, HCAOA