



December 26, 2019

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-2393-P
P.O. Box 8016
Baltimore, MD 21244

To Whom It May Concern:

Please accept this letter of comment on the recently proposed rule, "*Medicaid Program; Medicaid Fiscal Accountability Regulation.*" The changes in this proposed rule would impact our facility due to the rule's significant impact on Texas' largest pay for performance program called the Quality Incentive Payment Program (QIPP).

Chandler Nursing Center of Chandler, TX is committed to providing high quality care and continually strive to do the best for the residents we serve. Since September 1, 2019, Chandler Nursing Center has participated in the QIPP Program.

As the only supplemental payment program currently available for the nursing home sector in Texas caring for over 60,000 Medicaid recipients daily, QIPP demonstrates the importance the state places on improving quality outcomes for the frail and elderly of Texas. Having shown its effectiveness through actual improvement in measured outcomes, efforts to expand the program should be considered. The financing changes proposed in this rule would negatively impact access to care for residents in my community and would hit nursing facilities, like ours, a major employer in Chandler, TX. Because of QIPP, Chandler Nursing Center has been able to:

- Increase staffing;
- Better compete in an extremely competitive labor market and fill open positions;
- Reduce turnover;
- Implement new technologies;
- Improve and expand staff training and education programs;
- Improve quality;
- Make capital improvements to improve the physical setting for our residents.

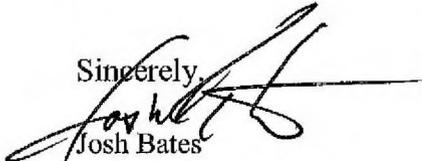
For example, because of QIPP, we have:

- Implemented Attendance Bonus Plans which allows Certified Nurse Aides to earn an addition \$2.00/hour per pay period based on attendance, adherence to their work schedule (no call-ins), and in-service attendance. Through this program, we have experienced improve recruitment and retention among Certified Nurse Aides.
- Added a Quality Assurance Nurse to focus on improving Quality Measures.

- Added SimpleLTC Technology to monitor resident acuity and Quality Measures in real-time.

We are passionate about the care our staff provide to our residents. If CMS moves forward with the proposed rule as drafted, we are concerned about the impact this would have on patient care and quality. In addition, given the tight timeframe CMS is proposing for states to come into compliance with the proposed changes, we request that CMS consider a five (5) year transition period that applies to *all* the regulatory changes proposed in this rule. Thank you for your time in reviewing and considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Bates", written over a horizontal line.

Josh Bates

Vice President /Owner

Transition Health Services