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August 30, 2018

Ms. Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Room 445–G  
Hubert H. Humphrey Building  
200 Independence Avenue, S.W.  
Washington, DC 20201

***Re: CMS-1689-P: Medicare and Medicaid Programs; Calendar Year 2019 Home Health Prospective Payment System Update.***

Dear Ms. Verma:

The Association for Professionals in Infection Control and Epidemiology (APIC) wishes to thank the Centers for Medicare & Medicaid Services (CMS) for the opportunity to provide input on the CY 2019 Home Health Prospective Payment System proposed rule. APIC is a nonprofit, multidisciplinary organization representing over 15,000 infection preventionists whose mission is to create a safer world through prevention of infection. We are pleased that CMS continues to demonstrate its commitment to improving the quality of patient care cross the healthcare continuum. We are mindful of the regulatory burden placed on facilities and support the Patients Over Paperwork and Meaningful Measures initiatives. Improving patient outcomes is a core part of our mission. Our comments will focus on the pneumococcal and influenza vaccine measures.

**Proposed Removal of Pneumococcal Polysaccharide Vaccine Ever Received Measure**

We appreciate CMS's proposal to remove the Pneumococcal Polysaccharide Vaccine Ever Received measure as this does not reflect current Advisory Committee on Immunization Practices (ACIP) guidelines. We urge Home Health Agencies to continue to encourage patient immunization in adherence with current ACIP guidelines.

***Recommendation:*** APIC supports removal of the Pneumococcal Polysaccharide Vaccine Ever Received measure.



## **Proposed Removal of Influenza Vaccine Received for Current Flu Season**

APIC is concerned that CMS proposes to remove the quality measure Influenza Vaccine Received for Current Flu Season. We are sensitive to the fact that not all patients will be eligible for vaccination; however, we believe this is an important patient safety measure that may be overlooked if no longer required to be reported. Home Health Agencies play an important role in sustaining a high level of vaccination coverage by assessing the immunization status of all patients in its care in order to maintain positive health outcomes throughout the healthcare continuum.

**Recommendation:** APIC opposes removal of this patient influenza vaccination measure.

APIC appreciates the opportunity to provide input on this proposed rule and is committed to ongoing work with CMS to ensure that patients receive the highest quality care in Home Health as well as all healthcare settings.

Sincerely,

A handwritten signature in black ink that reads "Janet Haas". The signature is written in a cursive style with a large initial "J" and a long, sweeping tail.

Janet Haas, PhD, RN, CIC, FSHEA, FAPIC  
2018 APIC President