

**TABLE 29: THRESHOLDS FOR FUNCTIONAL LEVELS BY CLINICAL GROUP, CY 2017**

<b>Clinical Group</b>	<b>Level of Impairment</b>	<b>Points (2017 Data)</b>
Behavioral Health	Low	0-36
	Medium	37-52
	High	53+
Complex Nursing Interventions	Low	0-38
	Medium	39-58
	High	59+
Musculoskeletal Rehabilitation	Low	0-38
	Medium	39-52
	High	53+
Neuro Rehabilitation	Low	0-44
	Medium	45-60
	High	61+
Wound	Low	0-42
	Medium	43-61
	High	62+
MMTA - Surgical Aftercare	Low	0-24
	Medium	25-37
	High	38+
MMTA - Cardiac and Circulatory	Low	0-36
	Medium	37-52
	High	53+
MMTA - Endocrine	Low	0-51
	Medium	52-67
	High	68+
MMTA - Gastrointestinal tract and Genitourinary system	Low	0-27
	Medium	28-44
	High	45+
MMTA - Infectious Disease, Neoplasms, and Blood-Forming Diseases	Low	0-32
	Medium	33-49
	High	50+
MMTA - Respiratory	Low	0-29
	Medium	30-43
	High	44+
MMTA - Other	Low	0-32
	Medium	33-48
	High	49+

In the CY 2019 HH PPS proposed rule, we solicited comments on the proposed functional OASIS items, the associated points, and the thresholds by clinical group used to group patients into three functional impairment levels under the PDGM, as previously outlined. The majority of comments received were very similar to those received on the alternate case-mix adjustment methodology (HHGM), in the CY 2018 HH PPS proposed rule. The

comments received are summarized in this section.

*Comment:* Most commenters agreed that the level of functional impairment should be included as part of the overall case-mix adjustment in a revised case-mix model. Commenters stated that including a robust functional level variable in the home health payment system will eliminate the incentive to provide unnecessary therapy services to reach higher classifications for payment but will also move the HH PPS toward

greater consistency with other post-acute care PPS.

*Response:* We thank commenters for their careful review of all variables contributing to the overall case-mix adjustment in the PDGM. We agree that functional status is an important component in understanding patient characteristics to help facilitate the development of an individualized home health plan of care based on identified needs and to help ensure that payment