

From: [John Wallace](#)
To: [AHS - DVHA Reimbursement](#)
Subject: FW: Rutland Regional Medical Center"s Comment regarding the proposed policy on same/next day readmission policy
Date: Friday, September 19, 2014 5:53:55 PM

I am submitting this comment on behalf of Rutland Regional Medical Center in regards to the proposed SPA for the same/next day readmission policy. We appreciate the opportunity to comment on the proposed policy and the information provided in the notice.

It is our understanding that DVHA proposes to require that hospitals report inpatient readmissions to the same hospital "on the *same or next day* after discharge." DVHA's policy summary does not explain the rationale for developing a policy that is inconsistent with Medicare's policy, which applies to readmissions to the same hospital "on the same day." See *Medicare Claims Processing Manual*, IOM 100-04, Ch. 3, Sec. 40.2.5 available at <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/clm104c03.pdf>. It is unclear whether DVHA intended to create a policy that is inconsistent with Medicare policy. While we appreciate DVHA's authority and potential advantages to developing its own payment policies we respectfully request that DVHA seek to avoid developing billing policies that create unnecessary inconsistency between payers that complicate an already overcomplicated process.

DVHA's provider impact analysis identifies a modest potential savings associated with the readmission policy. However, the analysis does not identify the additional incremental savings that could be attributed to adopting a policy that is inconsistent with Medicare's, and therefore does not establish any benefit to justify the additional administrative burden on hospitals.

We respectfully request that DVHA revise its proposed policy to make it consistent with Medicare's.

Respectfully submitted,

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