

CY 2026

HOME HEALTH PROPOSED RULE COMMENT TOOLKIT



Texas Association for
Home Care & Hospice
Leading ★ Advancing ★ Advocating

AUGUST 2025



BACKGROUND

On June 30, 2025, the Centers for Medicare & Medicaid Services (CMS) issued the Calendar Year (CY) 2026 Home Health Prospective Payment System (HH PPS) Proposed Rule (CMS–1828–P).

This proposed rule includes a devastating 9% cut to the home health 30-day payment rate— with total payments estimated to decrease by \$1.13 billion in 2026. This unprecedented reduction—the largest single year cut in recent memory—will have ripple effects across the country, jeopardizing access to essential care delivered in the home. Providers are already being forced to cut staff and reduce service areas. Patients in rural and underserved communities are at risk of losing access to care altogether.

CMS is seeking public comments on this proposed rule by August 29, 2025. Given this payment cut will profoundly impact patient access to home health services, it is critical that we make our voices heard.

This toolkit will help guide you in making comments to CMS on the rule. It is critical that everyone weighs in on the proposed reductions. CMS must hear from everyone individually affected by this devastating rule.

If you have any questions on how to submit comments, or would like additional guidance, please reach out to regulatory@tahch.org.



CY 2026 HOME HEALTH PROPOSED RULE - KEY THEMES

This Proposed Rule is a 9% cut to reimbursement, the largest single year cut in recent memory

This Proposed Rule Will Exacerbate an Existing Access to Care Crisis

This Proposed Rule Does Not Address Fraud, Waste, and Abuse in Any Meaningful Way

This Proposed Rule Will Further Destabilize an Already Fragile Home Health Delivery and Negatively Impact the Entire U.S. Healthcare System

This Proposed Rule Continues a Flawed Interpretation and Implementation of Congressional Mandate of Budget Neutrality

This Proposed Rule Does Not Save Money – It will Increase Overall Medicare Spending



CY 2026 COMMENT TEMPLATE

The template below will create an organized way to lay out your comments. Once you fill in the prompts below with your individual agency information, take that information and put it into a narrative document that you send to CMS. Instructions on how to submit your comments follow on the next page.

BEGIN YOUR COMMENTS

- Introduce yourself (if commenting individually) or for your organization.
- Explain why you are commenting. Why is this rule important to you?
- Identify the rule you are commenting on: “The Calendar Year 2026 Home Health Prospective Payment System Rate Update; Requirements for the HH Quality Reporting Program and the HH Value-Based Purchasing Expanded Model; Durable Medical Equipment , Prosthetics, Orthotics, and Supplies, Competitive Bidding Program Updates; DMEPOS Accreditation Requirements; Provider Enrollment; and Other Medicare and Medicaid Policies, rule.”

WHAT SHOULD I SAY?

FILL IN THE FOLLOWING PROMPTS

- How does a 9% reduction impact my business?
- Will you have to lay off staff?
- Will you have to consolidate your service area?
- Will you have to reduce the number of patients you serve?
- How will this impact the patients you serve?
- Share why you might be experiencing challenges now with hiring staff and what another cut will do to your ability to hire competent staff.
- Describe the extent your agency’s costs have increased in the last year. For example:
 - Have labor costs, supplies, PPE, and/or overall expenses exceeded the proposed 2.4% annual payment update?
- Describe specific gaps between rising costs and Medicare payments. For example:
 - “Nursing salaries went up [X]% this year, far above the payment update.”

**SIGN THE COMMENTS AND SUBMIT BY AUG. 29, 2026 —
SUBMISSION INSTRUCTIONS NEXT PAGE.**



CY 2026 HOME HEALTH PROPOSED RULE

HOW DO I SUBMIT A COMMENT?

- Go to **regulations.gov** on your internet browser.
- Search for the proposed rule's docket number. For the CY 2026 Home Health Proposed Rule, the docket number is:
CMS-2025-0242.
- Click on comment in the bottom right-hand corner.
- Click on this direct link:

<https://www.regulations.gov/document/CMS-2025-0242-0002>

PROPOSED RULE

Medicare and Medicaid Programs: Calendar Year 2026 Home Health Prospective Payment System Rate Update; Requirements for the HH Quality Reporting Program and the HH Value-Based Purchasing Expanded Model; Durable Medical Equipment, Prosthetics, Orthotics, and Supplies Competitive Bidding Program Updates; DMEPOS Accreditation Requirements; Provider Enrollment; and Other Medicare and Medicaid Policies

Agency Centers for Medicare&Medicaid Services | Posted Jul 2, 2025 | ID CMS-2025-0242-0002

Open for Comments

 Comment Period Ends: **Aug 29, 2025 at 11:59 PM EDT**

 **Comment**