



HomesRenewed Coalition

4101 Albemarle St., NW, # 408, Washington, D.C.

www.homesrenewedcoalition.com

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RE: Fall Prevention Amendment to Older Americans Act

Dear Chairman Collins and Ranking Member Casey:

We write on behalf of HomesRenewed in response to the Committee's recent call for recommendations on the management and prevention of falls and fall-related injuries. We applaud the Committee's attention to this important issue and your commitment to developing constructive policies on fall prevention and management, and we appreciate this opportunity to provide our views.

HomesRenewed is dedicated to increasing the number of homes that are prepared for residents to live throughout the modern lifespan. Improving the suitability of homes for aging in place will reduce the costs of providing for the needs of the nation's older adults. We have formed a coalition representing a broad range of stakeholders that includes consumers, not-for-profit organizations, professionals, and businesses from sectors including long term care insurance, homecare, remodeling, medical equipment suppliers, and technology.

While your request for recommendations identifies many important issues, our focus in these comments is primarily on your call for ideas on tools and resources that empower individuals to reduce risks in their home environment. This goal is central to the HomesRenewed mission of increasing age-friendly housing stock across the country.

Toward this end, as discussed in more detail below, we believe an effective federal strategy should include the following major components: (1) financial incentives for undertaking home modifications that promote safety and ease of movement within the home; and (2) demonstration programs that support the development of processes for (a) clear, user-friendly training for home modification installations; (b) validation of proper installation; and (c) data collection about the effectiveness of installations. These processes will form a foundation for achieving effective and reliable accessible home modifications on a large scale.

Overview

Significant recent research points to impending health and housing cost crises for the nation and families. As noted by Federal Reserve Chair, Jerome Powell, in an interview on July 12, 2018:

Longer term, it is widely understood that the United States is on an unsustainable fiscal path, largely due to the interaction between an aging population and a health care system . . . that is much higher [cost] than any other advanced economy.¹

There is no way to slow down the rate of aging, so it is vital to our fiscal health to reduce the cost of health care. Updated, accessible home environments can support aging in place. By helping to avoid injury and providing a better platform for beneficial use of technology, personal care assistance and home medical equipment, the use of expensive nursing and rehab facilities would be reduced significantly. According to the CEO of one of the nation's largest health systems, the trend to siphon off residents from skilled nursing facilities into the home health space will be accelerating in the future.²

While it seems intuitively obvious that updated homes (with grab bars, stair rails, improved lighting, non-slip flooring, etc.) would help residents avoid injury, to date there are few formal studies that have generated data to test this assertion. One pathbreaking study, the CAPABLE project at Johns Hopkins University, shows that modest investment in home modification yielded significant medical cost savings for a population of seriously ill Medicaid recipients.³ However, further studies are needed to measure the reduction in number and severity of falls, as well as, overall medical cost savings by making proactive, preventative home modifications for the population of non-frail, middle-income older Americans, who constitute approximately 70% of all citizens over 65.

Other recent studies demonstrate growing concern over:

- The high health care costs leading to bankruptcy, long-term debt, damaging the US economy or foregoing treatment,⁴
- The lack of housing suited for the needs of older adults (by 2035, over 17 million with mobility impairment) while recognizing that most care will occur in owner-occupied, single family homes,⁵
- The shift in delivery of healthcare to the home without sufficient preparedness in policy, design, or research,⁶ and
- The financial straits of middle class Americans that is forcing many to stretch budgets to afford housing while foregoing healthcare during retirement.⁷

To address these problems, HomesRenewed believes that two federal-level policy goals are paramount: providing financial incentives for home modification, and establishing demonstration programs that hone installation and verification processes and develop data to inform effective home modification.

¹ Marketplace, *Fed. Chair Jay Powell: We're Independent of Political Considerations* (July 12, 2018).

² Skilled Nursing News, *Hospital Exec: 'Almost Nothing' Won't Move to the Home Amid Shift to Lower-Cost Care Settings* (June 18, 2019).

³ Szanton et al., *Journal of the American Geriatrics Society, Medicaid Cost Savings of a Preventive Home Visit Program for Geriatric Patients* (November 2017).

⁴ West Health Foundation and The Gallup Organization, *The U.S. Healthcare Cost Crisis*, online at: <https://news.gallup.com/poll/248081/westhealth-gallup-us-healthcare-cost-crisis.aspx>.

⁵ Harvard Joint Center for Housing Studies, *Housing America's Older Adults* (2018) and Harvard Joint Center for Housing Studies, *The State of the Nation's Housing* (June 19, 2018).

⁶ The Center for Health Design, *Healthcare at Home: A White Paper* (April 2019).

⁷ Health Affairs, *The Forgotten Middle* (May 2019).

Financial Incentives for Home Modification

We recommend that the Committee include in any falls-prevention legislation a robust set of financial incentives to promote home modifications that facilitate aging in place and reduce fall risks. Models for the Committee to consider include:

- H.R. 1780, introduced in the 115th Congress, which called for a \$30,000 tax credit for people over 60 who do home modifications for aging in place.
- Alternate financing mechanisms to reach those with pre-tax retirement savings. For example, allowing use of 401K, TSP or IRA accounts tax-free and without penalty for early withdrawal would slightly reduce future federal revenues but save significantly in future Medicare costs.
- Tax credit policies and other incentive programs initiated in states and localities including Montgomery County⁸ and Howard County⁹ Maryland, and the states of Virginia,¹⁰ Maine,¹¹ Maryland,¹² and Washington.¹³

Demonstration Program

The recent expansion of Medicare Advantage coverage to include certain home modifications¹⁴ only augments the need for clear criteria to measure appropriate installation of accessibility features. Validation that an item was installed properly and in the right location assures payers and consumers that the home modification will function to promote successful aging in place. We therefore recommend that the Committee include in any fall-prevention legislation provisions to a demonstration program that will model processes for training, validation of proper installation, and conducting data collection regarding age-friendly modifications in private homes.

A robust demonstration program would generate data to evaluate the assertion that home modifications improve the health and wellness while reducing the medical costs of residents in their own homes. Such data could encompass subjects including health benefits and costs savings associated with home modifications. A demonstration program also could develop successful approaches for establishing and utilizing installation guidelines. Note that one way of standing up such a demonstration would be to do it as a Medicare pilot program that would help establish procedures for reimbursing under the expanded Medicare Advantage provisions covering home modifications.

Other Recommendations

⁸ See <https://www.montgomerycountymd.gov/design/>.

⁹ See <http://mdod.maryland.gov/housing/Pages/Home-Modifications.aspx>.

¹⁰ See <https://www.dhcd.virginia.gov/lhtc>.

¹¹ See <http://www.mainehousing.org/programs-services/HomelImprovement/homeimprovementdetail/comfortably-home-program>.

¹² See <http://mgaleg.maryland.gov/2017RS/bills/sb/sb0180f.pdf>.

¹³ See <https://www.agingwashington.org/files/2019/02/2019-Long-Term-Care-Trust-Act-Factsheet.pdf>.

¹⁴ See <https://www.cms.gov/Medicare/Health-Plans/MedicareAdvtgSpecRateStats/Downloads/Announcement2020.pdf>.

The Committee in its request for recommendations also expressed an interest in reviewing options for improving the use of Medicare visits to prevent falls, and promoting transitions of care that minimize risk of injury re-injury. For both, we recommend major publicity campaigns to make people aware of some of the low-cost improvements to their homes. Part of this effort may be developing a user-friendly guide to key home modifications such as grab-bars and accessible entrances and exits that would be provided as a matter of course to patients and their families during Medicare visits and when transitioning out of hospitals and nursing homes.

Conclusion

HomesRenewed believes that home modifications, done correctly, will not only advance fall-prevention, but will also enable older adults to age in place safely, happily and at less cost than many other housing options, especially nursing homes. We strongly believe that if homes are properly prepared, medical costs will be lowered for the individual, the family, and the nation overall. Once there are more older people living throughout the community (rather than concentrated in assisted living or self-contained retirement communities), new business models will develop to provide food, transportation, and other services to meet the other needs of this segment of our population in a more economical way than ever before. So a prepared home is the linchpin which enables all sorts of innovation to follow. With all the marvels of advanced technology, including telemedicine, what is the benefit if the resident can't get in or out of their front door or take a shower?

We are encouraged by the Committee's attention to fall prevention as a necessary component of reauthorization of the Older Americans Act. We see it as a step in the right direction towards a more comprehensive approach to home modifications that would provide the platform for lower-cost delivery of medical treatment and social services for America's older population. We welcome the opportunity to testify before the Committee or to meet with staff to present in greater detail all the topics mentioned in this letter.

Thank you for your consideration.

Respectfully submitted,

/s/

Louis Tenenbaum
Founder and President
HomesRenewed Coalition