

### Summary of Current National Medicare Oxygen Proposals/Activities

Oxygen Policy/Consideration	Ross Reform Plan (AAH/CQRC Reform Plan)	NAIMES/CSIHME Proposal	HR2373 HOPP Act	Comments
Status as of 7.01	Legislative Language being developed for potential inclusion into overall Health Care Reform Package or via a stand-alone bill.	Being reviewed by Senate Finance, House Ways & Means, and Energy & Commerce for potential inclusion into overall Health Care Reform Package	Acquiring HR Sponsors	
Who is advancing/supporting	AAHomecare and CQRC, Limited state associations	VGM, NAIMES, CSIHME, Various state associations	VGM, NAIMES, Various state associations	
1) <i>Eliminates 36 Month Cap</i>	Yes	Yes	Yes	
1a) Pay-for consideration to eliminate Cap included in proposal	Yes - states reclassification of payment categories to be "budget neutral" based upon some as yet to be determined percentage distribution among the payment categories. Budget neutral means an estimated cut of 18-22% from current fees as pay-for.	Yes – offers to reduce payments for stationary only and increase payments for combined stationary and portable. Plan results in savings.	No – presumably a "pay-for" would be considered in the future	
2) Revises reimbursement into a specific number of payment "categories"	Yes – Three, 1. No portability needs and nocturnal only; 2. Standard Portability Needs; and 3. High Portability Needs	Yes – Two, 1. Stationary needs only, 2. Stationary and portable needs combined, modality neutral.	NA	
2a) Payment classifications are modality neutral	Yes	Yes	NA	
3) Includes CPI-U Adjustments	Yes	Yes	No	
4) <i>Eliminates oxygen from Competitive Bidding</i>	Yes	No	No	
4a) Pay-for consideration to eliminate Competitive Bidding included in proposal	Not specifically addressed, although to keep budget neutrality with elimination from competitive bidding, estimates for payment reductions are potentially high	No – Competitive bidding to be addressed as a separate issue	NA	
5) Includes service as an integral component of Home Oxygen Therapy provision and reimbursement methodology	Yes	Yes	No	
5a) Defines Minimum Service Elements	Yes	Yes	No	
6) Considers patient testing and re-testing criteria	Yes	Yes	No	
6a) Supplier role in re-testing process	Facilitation of retesting <u>required</u> of supplier	Patient/physician notification by supplier	No	
7) <i>Clinical Respiratory requirement?</i>	No-but patient compliance monitoring visits required. (All other current provider categories require clinical staff.)	No-physician notification of patient compliance issues as supplier becomes aware	No	
8) <i>Removes Oxygen from DMEPOS supplier category and creates new oxygen provider category</i>	Yes	No	No	
9) <i>Creates supplier/provider annual cost reporting requirement</i>	Yes	No	No	
11) <i>Relative Complexity of Solution</i>	Very Complex	Moderate	Simple	