



UnityPoint Health

UnityPoint Health
1776 West Lakes Parkway, Suite 400
West Des Moines, IA 50266
unitypoint.org

November 6, 2017

William N. Parham, III
Director, Paperwork Reduction Staff
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: CMS-10631 / OMB Control Number 0938-1326
Room C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

RE: CMS-10631 Agency Information Collection Activities - The PACE Organization Application Process in 42 CFR part 460; Federal Register Vol. 82, No. 170, p. 41966 (September 5, 2017).

Submitted electronically via www.regulations.gov

Dear Mr. Parham:

UnityPoint Health (UPH) and Siouxland PACE are pleased to provide input in response to the Centers for Medicare & Medicaid Services' (CMS) comment request relating to the Programs of All-Inclusive Care for the Elderly (PACE) Organization application process. UPH is one of the nation's most integrated healthcare systems. Through more than 30,000 employees and our relationships with more than 290 physician clinics, 38 hospitals in metropolitan and rural communities and home care services throughout our 9 regions, UPH provides care throughout Iowa, Illinois and Wisconsin. On an annual basis, UPH hospitals, clinics and home health provides a full range of coordinated care to patients and families through more than 6.2 million patient visits. In addition, UPH is committed to payment reform and is actively engaged in numerous initiatives which support population health and value-based care. Siouxland PACE started in 2008 with assistance from a CMS Rural PACE Development grant. Since 2011, Siouxland PACE has been under the ownership of UnityPoint Health – St. Luke's, a UPH senior affiliate in northwest Iowa. Currently, there are 179 Participants receiving PACE services from four northwest Iowa counties.

As an integrated healthcare system, UPH believes that patient-centered care is best supported by a value-based payment structure that enables healthcare providers to focus on population health instead of volume-based episodic care. PACE epitomizes this principle and provides holistic, patient-centric care in a community-based setting. We appreciate the time and effort spent by CMS to update and revise the PACE Organization application. We respectfully offer the following comments to the proposed regulatory framework.

SUBMISSION PROCESS FOR PACE ORGANIZATION APPLICATION

2017 Programs of All-Inclusive Care for the Elderly Application Guidance: CMS publishes quarterly submission dates in its annual application guidelines. For Initial and SAE Applications, CMS accepts application submission quarterly on a single submission date. For 2017, these dates are March 31, June 30, September 29 and December 29.

- **Comment:** We are extremely disappointed that the proposed Application Process did not revise the submission timing process. The current one-day-per-quarter submission period does not promote efficient operations or prioritize PACE participants' needs and access to comprehensive services. This limited submission timeframe fails to give any deference to PACE Organizations and the complex SAA and licensing requirements that must be met and do not necessarily correspond to end of quarter timelines. We urge you to expand the submission period each quarter and, ideally, request that applicants be accepted on a continual basis, particularly for SAE applications.

PACE ORGANIZATION APPLICATION CONTENT

Mirror Attestation and Documentation Requirements for SAE Applicants to Initial Applicants: CMS states that "the most significant proposed revision is a new requirement to have SAE applicants respond to the same attestations and upload the same documentation required of initial PACE applicants."¹

- **Comment:** While we are pleased that CMS has detailed the application requirements for SAE, including new PACE center sites, we do not agree with the proposed approach for new centers – whether these are additional centers or centers that replace a current site. When new centers are involved, this should involve an expedited application process in terms of streamlined documentation and timeframes. In Section 2.3 – Chart of Required Attestations and Uploads, we would request that for new PACE centers the Columns "SAE" and "Upload Required (SAE)" revert to their former requirements (i.e., current law).

Our recommendation is based on our recent experience relocating our primary and only PACE center serving PACE residents in northwest Iowa. Our center was relocated to larger and more appropriately outfitted facility. We did not change geographic service area and the new location was within 6 blocks of our old center location. Using the current CMS process with its more limited document submission and review process, we provided CMS with approximately 60-days' notice, but did not receive CMS approval until 3 days prior to our requested move date. We fear that further documentation and attestation requirements will not only delay the submission process but also delay the review period by CMS. Ultimately, these process requirements for SAE applicants result in further delay in access to services and care for PACE participants.

Application Burden Attributed to Application Preparation and Submission Requirements: CMS states "the burden associated an SAE application is approximately half the burden of an initial application. CMS estimates that an SAE application will require approximately 18 hours per application."²

¹ Supporting Statement A - The PACE Organization Application Process in 42 CFR Part 460 (CMS-10631, OMB 0938-1326), page 17.

² Supporting Statement A - The PACE Organization Application Process in 42 CFR Part 460 (CMS-10631, OMB 0938-1326), page 9.

- **Comment:** We disagree with the time and effort assumption forwarded by CMS. For the 2016 center relocation application referenced above, it took our PACE organization significantly more than the 32 hours of work (i.e., time and effort attributed to initial applications) to submit necessary paperwork and follow-up with CMS and SAA. In addition, we do not believe that SAE applications require only one-half of the effort attributed to initial applications. We estimate that these applications require approximately 100 hours depending upon stage (initial, SAE, or new center), service area and organizational nuances. We urge CMS to revisit these calculations with stakeholder input taking these considerations into account.

State Readiness Review: The Application states “CMS will only approve applications from potential PACE organizations that satisfy federal requirements as determined based on review of the PACE application, and have met the requirements of a State Readiness Review (SRR).”

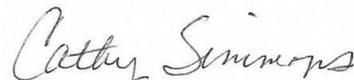
- **Comment:** Based on our experience with the application to relocate our center, we request that CMS grant provisional approval pending state/local licensing decisions. In our situation, it took a significant amount of time to obtain a City Certificate of Occupancy. While we had received verbal approval, there was a substantial time gap between receiving the verbal approval and the executed document. We encourage CMS to consider adding flexibility in the form of provisional / conditional approvals.

On behalf of our PACE Participants, Siouxland PACE and UnityPoint Health appreciates the opportunity to provide comments to the proposed agency information collection activities. In addition, Siouxland PACE is a member of the National PACE Association (NPA). We generally support the comments submitted by NPA and are committed to participating with the NPA to further strengthen services and supports for the PACE population. Siouxland PACE and UnityPoint Health look forward to participating in future PACE rulemaking and other stakeholder forums. To discuss Siouxland PACE comments or for additional information on any of the addressed topics, please contact Cathy Simmons, Executive Director of Regulatory Affairs at cathy.simmons@unitypoint.org or 319-361-2336.

Sincerely,



Randy Ehlers, MSW
Executive Director
Siouxland PACE



Cathy Simmons, JD, MPP
Executive Director, Regulatory Affairs
UPH Government & External Affairs