



UnityPoint Health

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

November 30, 2017

Centers for Medicare and Medicaid Services
Attention: Econometrica, Inc. (HHS-500-2013-13006I)

RE: Development, Implementation, and Maintenance of Quality Measures for the Programs of All-Inclusive Care for the Elderly (PACE) – Stream 2

Submitted electronically via PACEQMcomments@econometricainc.com

Dear PACE Stream 2 Quality Measures Development Team:

UnityPoint Health (UPH) and Siouxland PACE are pleased to provide input in response to the Centers for Medicare & Medicaid Services' (CMS) comment request via its contractor, Econometrica, Inc., relating to proposed Stream 2 measures for the Programs of All-Inclusive Care for the Elderly (PACE) program. 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.

In Stream 2, four new quality measures are being proposed:

- Percentage of Participants With an Advance Directive or Surrogate Decision-Maker;
- Percentage of Participants With an Annual Review of Their Advance Directive or Surrogate Decision-Maker;
- Percentage of Participants Not in Nursing Homes; and
- Percentage of Participants With Depression Receiving Treatment.

Siouxland PACE is extremely supportive of initiatives to provide and track quality care. The Stream 2 draft measures appear appropriate and relevant for a PACE population. That said, we have two basic concerns: (1) administrative burden; and (2) overall scope. In terms of burden, we are concerned about the time and effort needed to track and report these new measures as it is unlikely that capitation rates will increase to reflect this added burden. While we track some of these efforts, we do not track in the manner specified by these measures. For the most part, this will involve manual collection until we can eventually convert some to an electronic platform (at added expense). Prior to any measure adoption, we encourage piloting these measures with several PACE organizations at varying degrees of EHR integration / adoption to determine level of effort and providing an additional comment period related to testing efforts and

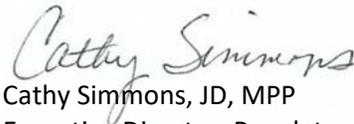
resulting time and effort studies. Second, it is difficult to comment on individual measures without understanding the totality of this quality measure project. We do not know how many total measures will ultimately be included within the final measure set nor how they are intended to be risk adjusted and impact our rates. While we are pleased that CMS is aligning these measures within the “Meaningful Measures” constructs, we lack an overall understanding of the final collection and reporting ask. We urge more transparency in the overall process so that we have better context in which to comment.

On behalf of our PACE Participants, Siouxland PACE and UnityPoint Health appreciates the opportunity to provide comments to the Stream 2 proposed measures. 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 measure development and other stakeholder forums. To discuss Siouxland PACE comments or for additional information, 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