

November 5, 2018

The Honorable Tom Carper United States Senate 513 Hart Senate Office Building Washington DC, 20510

Dear Senator Carper:

The Patient-Centered Primary Care Collaborative (PCPCC) encourages the passage of the Comprehensive Care for Seniors Act of 2018 (S.3338) before the end of the 115th Congress. PCPCC believes that Programs of All-Inclusive Care for the Elderly (PACE) exemplify many of the goals found in our <u>Shared Principles of Primary Care</u> – namely an emphasis on high-value care primary care that is coordinated, integrated, team-based, and incorporates patient and family caregivers.

The legislation would require CMS to finalize updated regulations for Programs of All-Inclusive Care for the Elderly (PACE), that were originally proposed in 2016. PACE programs are fully risk bearing and utilize capitated payments to offer a full range of services and supports to Medicare and/or Medicaid beneficiaries who are at least 55 years old and qualify to be in a nursing home, according to their state. The forthcoming final rule is expected to strengthen protections and improve care to beneficiaries, while providing administrative flexibility and regulatory relief for PACE organizations.

Founded in 2006, the PCPCC is a not-for-profit multi-stakeholder membership organization dedicated to advancing an effective and efficient health system built on a strong foundation of primary care and the patient-centered medical home. Representing a broad group of public and private organizations— the PCPCC's mission is to unify and engage diverse stakeholders in promoting policies and sharing best practices that support growth of high-performing primary care to achieve the "Quadruple Aim": better care, better health, lower costs, and greater joy for clinicians and staff in delivery of care.

PCPCC's Shared Principles of Primary Care, now endorsed by nearly 300 organizations, support care primary care that is grounded in mutually beneficial partnerships among clinicians, staff, individuals and family caregivers as equal members of the care team. Care delivery is customized based on individual and family strengths. Because of its patient centered focus, this legislation aligns with PCPCC's goal of promoting integrated, coordinated, and patient-centered healthcare ultimately leads to better outcomes and value.

The PACE program, with enrollments across 31 states, is a person-centered model of care delivery. The interdisciplinary team approach enables participants to remain in the community.

Given that PACE payments are capitated, paid monthly by CMS to the PACE provider using formulas that incorporate risk adjustment, this payment model promotes comprehensive, high value care and disincentivizes fragmented care provision to these medically-complex individuals, as often is the result in Medicare fee-for-service.

Thank you for your consideration of this important legislation. PCPCC and its multisector members look forward to working with you to enact polices which promote high value care as well as person-centered, team-based, community aligned primary care. Those ends will help achieve the goals of better health, better care, and lower costs and advance innovation in our healthcare system as a whole. Please feel free to contact Christopher Adamec, Director of Policy at cadamec@pcpcc.org or 202-640-1212 with any questions.

Sincerely,

Ann Greiner

President & CEO

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Executive Members

Accreditation Association for Ambulatory Health Care (AAAHC)

ActiveHealth Management

Aetna Life Insurance

Alzheimer's Association

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America's Agenda

Anthem

Bess Truman Family Medical Center

Black Women's Health Imperative (BWHI)

Blue Cross Blue Shield Michigan

Blue Cross Blue Shield of North Carolina

Bon Secours Medical Group

CareFirst BlueCross BlueShield

Collaborative Psychiatric Care

Community Catalyst

CVS Health

Family Medicine for America's Health

Harvard Medical School Center for Primary Care

HealthTeamWorks

Humana, Inc.

IBM

Innovaccer

Institute for Patient and Family-Centered Care (IPFCC)

Johns Hopkins Community Physicians, Inc.

Johnson & Johnson

Mathematica

MedNetOne Health Solutions

Merck & Co.

Morehouse School of Medicine - National Center for Primary Care

National Alliance of Healthcare Purchaser Coalitions

National Association of ACOs (NAACOS)

National Association of Chain Drug Stores (NACDS) Foundation

National Coalition on Health Care

National Interprofessional Initiative on Oral Health (NIIOH)

National PACE Association

National Partnership for Women & Families

NCQA

Oracle Global Healthcare and Life Sciences

Pacific Business Group on Health (PBGH)

Permanente Federation, LLC

PCC EHR Solutions

Primary Care Development Corporation (PCDC)

Takeda Pharmaceuticals U.S.A.

The Verden Group's Patient Centered Solutions

University of Michigan Department of Family Medicine

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