



UnityPoint Health

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December 26, 2019

William N. Parham, III, Director Paperwork Reduction Staff
Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: CMS-10631
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: CMS-10631- Agency Information Collection Activities: Proposed Collection; Comment Request; published in Vol. 84, No. 209 Federal Register 57876-57877 on October 29, 2019.

Submitted electronically via www.regulations.gov

Dear Director Parham:

UnityPoint Health (“UPH”) appreciates the opportunity to provide comments in response to the Centers for Medicare & Medicaid Services’ (CMS) proposed information collection request regarding the Programs of All-Inclusive Care for the Elderly (PACE) Organization Application Process in 42 CFR part 460. 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 221 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 Audit Protocol. For the most part, this proposal represents a concerted effort to match regulations with practice and to balance regulatory flexibility required to enable services to meet individual PACE Participant and family needs and goals.

We respectfully offer the following comments to the proposed regulatory information collection request.

SUPPORT OF NATIONAL PACE ASSOCIATION COMMENTS

Siouxland PACE is a member of the National PACE Association (NPA). We support the comments dated December 9, 2019 submitted by NPA and are committed to participating with the NPA to further strengthen services and supports for the PACE population. In particular, we would emphasize our support for NPA's recommendations related to service area expansion applications and the importance of distinguishing between applications submitted by PACE Organizations (POs) in order to open new PACE centers in existing service areas and those to expand their geographic service areas. We also are supportive of NPA's request to allow POs to have more than one new PACE center or service area expansion application under CMS review concurrently.

PACE CENTER RELOCATIONS

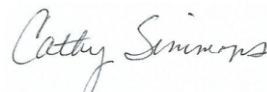
Aside from streamlining the application process for service area expansion, we would encourage similar consideration for PACE Center relocations. For instance, when POs are relocating their PACE center site perhaps due to loss of lease or to accommodate participant growth, the application and readiness review should focus on the new facility/site, not general written policies and procedures related to overall PACE governance, PACE services, participant enrollment and disenrollment, participant rights, etc. Policies unrelated to the physical facility/site are already subject to biennial reviews from CMS as well as at least annual SAA review and should not be reexamined within the scope of a PACE center site relocation request.

On behalf of our PACE Participants, Siouxland PACE and UnityPoint Health appreciate the opportunity to provide comments to the proposed information collection request. We look forward to participating in future PACE rulemaking and other stakeholder forums. To discuss our comments or for additional information on any of the addressed topics, please contact Cathy Simmons, Government and External Affairs at cathy.simmons@unitypoint.org or 319-361-2336.

Sincerely,



Randy Ehlers, MSW
Executive Director, Siouxland PACE



Cathy Simmons, JD, MPP
Executive Director, UPH Regulatory Affairs