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NASDDDS



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Patrick Conway, MD, MSc  
Acting Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Baltimore, MD 21244

March 1, 2017

Dear Dr. Conway:

On behalf of the National Association of Medicaid Directors (NAMD), the National Association of State Directors of Developmental Disabilities Services (NASDDDS), and the National Association of States United for Aging and Disabilities (NASUAD), we are writing to express our interest in working with you and your staff as you develop models to test innovations in Programs of All-inclusive Care for the Elderly (PACE) to ensure that our respective comments and members are duly considered and reflected. Our associations represent state agencies that provide a wide range of health care, long-term services and supports, and social services to older adults and persons with all types of disabilities. Our members also have responsibility for policy development, programmatic operations, and financing of Medicaid and LTSS services. Due to the role of states in financing and administering these programs, we believe that the perspectives of state agencies should receive unique consideration during the development of new models that impact LTSS delivery at the state and local levels.

NASDDDS and NASUAD each submitted a comment letter responding to the recent request for information (RFI) about the PACE innovation act and the proposed Person Centered Community Care (P3C) demonstration. All three of our organizations support the comments, concerns, and suggestions that were articulated in those letters. We appreciated the opportunity to review the P3C proposal and provide feedback. However, we believe that the associations and our membership should have opportunities to engage with CMS staff beyond commenting on the RFI.

In addition to the joint responsibility for LTSS administration, regulation, and financing, our staff and the state agencies also bring unique experience and expertise regarding the delivery of community-based LTSS across the country. We believe that our knowledge and feedback would be very valuable to CMS as you work to finalize the P3C model and develop new demonstrations to improve the services and supports provided to individuals in the community. We hope to have ongoing opportunities to engage with you and your staff throughout development of these models.

We would appreciate an opportunity to follow-up and identify options for collaboration around the development of this model and others in the future. Jack Rollins at NAMD ([jack.rollins@medicaiddirectors.org](mailto:jack.rollins@medicaiddirectors.org)), Dan Berland at NASDDDS ([dberland@nasddds.org](mailto:dberland@nasddds.org)), and Damon Terzaghi at NASUAD ([dterzaghi@nasuad.org](mailto:dterzaghi@nasuad.org)) can be the designated individuals to coordinate with CMS

staff regarding these issues. Additionally, please feel free to contact them with other questions and concerns.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mary Lee Fay'.

Mary Lee Fay  
Executive Director  
National Association of State Directors of  
Developmental Disabilities Services

A handwritten signature in blue ink, appearing to read 'Martha A. Roherty'.

Martha A. Roherty  
Executive Director  
National Association of States United for Aging  
and Disabilities

A handwritten signature in black ink, appearing to read 'Matt Salo'.

Matt Salo  
Executive Director  
National Association of Medicaid Directors