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Total Life Healthcare appreciates the opportunity to submit a comment in response to CMS' second notice of opportunity to comment on The PACE Organization (PO) Monitoring and Audit Process in 42 CFR part 460 published in the Federal Register on May 10, 2022. We want to express our appreciation for CMS' favorable consideration of comments submitted by the National PACE Association (NPA) and others in response to the initial request for comments on the revised 2023 PACE audit materials.

We ask that you consider NPA's latest comment, in particular NPA's requests to: 1) further consider opportunities to reduce the burden of the List of Participant Medical Records data universe; 2) provide additional time to submit the new monitoring and tracking report(s) in light of new documentation requirements due within 20 business days of PACE organizations' receipt of the audit engagement letter; and 3) provide PACE organizations with training and opportunities to engage with CMS on the 2023 PACE audit materials as soon as possible after they are finalized. We strongly support NPA's comment and recommendations and ask you to consider them favorably.

Thank you.