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The PACE Organization (PO) Monitoring and Audit Process (CMS-10630)

Comment On: CMS-2024-0361-0001

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Comment on CMS-2024-0361-0001

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General Comment

The state of Washington, Aging and Long-Term Support Administration (AL TSA), appreciates the opportunity to submit comments on the proposed updates to the Programs of All-Inclusive Care for the Elderly (PACE) audit protocol and other supporting data collection instruments.

Title of Information Collection: The PACE Organization (PO) Monitoring and Audit Process

If the intent of the changes is to clarify and streamline the monitoring and audit process, Washington state (WA) would be in support of these proposed changes for the following reasons:

Compliance: The cited sections of the Act and regulations mandate that PACE organizations are subject to monitoring and auditing, will enhance current monitoring practice by ensuring data collection aligns with these requirements. **Efficiency:** There are numerous areas CMS is proposing modifications, additions and removals of data fields. Updating the process could allow for more efficient data gathering methods, if the intent is for clarification and to reduce the administrative burden for a PACE organization while still providing necessary oversight. **Accuracy & relevance:** A revision may introduce new data points or modify existing ones to better improve clarity for the PACE Organization and streamline the audit process. WA appreciates how CMS is making numerous changes based on listening to the PACE organizations and audit experience to better clarify audit instructions. **Transparency & accountability:** A revised monitoring and audit process can improve transparency in how PACE organizations are evaluated, enhancing accountability to stakeholders.

Overall, while CMS views many of the changes as having a low impact, those items will require an upfront workload as there are many technical changes to data fields and reports as well as new documents (Templates and cover sheet) requiring the PACE organization to make some changes and time to fully understand the change.