

January 3, 2017

Centers for Medicare and Medicaid Services  
Office of Strategic Operations and Regulatory Affairs  
ATTN: CMS-10630/OMB Control #: 0938-New  
Division of Regulations Development  
7500 Security Boulevard, Room C4-26-05  
Baltimore, MD 21244-1850  
Submitted via: <http://www.regulations.gov>

**Re: CMS-10630 (OBM control number: 0938-New): The PACE Organization (PO)  
Monitoring and Audit Process**

On Lok Senior Health Services (On Lok) appreciates the opportunity to comment on the Centers for Medicare and Medicaid Services' (CMS) information collection request published in the Federal Register (FR) on December 2, 2016 relating to the *PACE organization monitoring and audit process*.

On Lok Senior Health Services was created in San Francisco over 40 years ago to enable frail older adults remain in their own homes and communities with supportive services. Through a series of federal demonstration projects, On Lok created the national prototype for Program of All-Inclusive Care for the Elderly (PACE). Today, On Lok's PACE Program, On Lok Lifeways, serves almost 1,500 PACE participants, the vast majority of whom are dually eligible for Medicare and Medicaid. On Lok Lifeways participants are 82 years of age on average, with 46% over the age of 85. Our average participant has 21 medical diagnoses and 61% have a diagnosis of Alzheimer's disease or related dementia.

We endorse the comments made by the National PACE Association (NPA) in its comment letter regarding the CMS PACE organization monitoring and audit process. In particular, we want to echo NPA's concern regarding the administrative burden of the new process and its focus on administrative requirements rather than the outcome of participant care. We urge CMS to focus on the extent to which POs provide quality care to PACE participants through observation of participant care, quality measures and medical records review.

We would like to underscore the following comments:

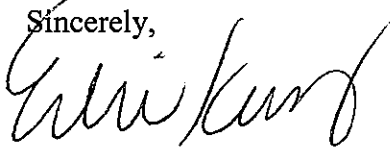
- **Data Collection and Reporting Burden:** We believe the CMS' estimates for the pre-audit phase significantly underestimate the PACE organization's staff time to retrieve and prepare the detailed information that CMS is proposing. Rather than requiring POs to submit the entire universe of participant and personnel data, we strongly urge CMS to employ a sampling methodology that would enable CMS to note trends. Since On Lok

Lifeways serves almost 1,500 participants and employs over 600 direct care staff, the burden of preparing and submitting the entire universe of data as currently proposed is a significant commitment of staff time that we do not believe is reflected in the CMS estimates and diverts staff from more meaningful activities. In addition, some of the data elements would require reprogramming On Lok's electronic health record (EHR) system to automate the retrieval process which will require an investment of resources and take time to implement.

- **Turnaround Time for Impact Analysis:** We appreciate CMS extending the time POs have to complete the Impact Analysis (IA) template from 3-5 days to 10 days. However, given the detailed information required, we urge CMS to increase the turnaround time for submitting the IA template to no more than 30 business days.
- **Service Delivery Requests:** We are concerned that tracking and collecting data for the universe of approved service delivery requests is an administrative burden without benefit to the beneficiary and believe that it may ultimately result in a delay in delivering approved services. We strongly recommend that CMS remove the requirement to log approved service delivery requests.
- **Universe Preparation and Submission:** We agree with NPA's comment about changing the time frame for CMS to provide POs with selected audit samples from one business day to at least 5 business days prior to the audit element review.
- **Quality Assessment:** We agree with NPA that clarification is needed regarding examples of tracer case study and what will be reviewed as part of the tracer evaluation.

Thank you for your consideration of our comments.

Sincerely,



Eileen Kunz

Chief of Government Affairs and Compliance