



December 23, 2019

Office of Management and Budget
Office of Information and Regulatory Affairs
Attention: CMS Desk Officer
Email: OIRA_submission@omb.eop.gov

RE: CMS-10630 (OMB control number: 0938-1327)—Programs of All-Inclusive Care for the Elderly (PACE) 2020 Audit Protocol

PACE CNY appreciates the opportunity to respond to the Centers for Medicare & Medicaid Services' (CMS) request for comment on the PACE 2020 Audit Protocol materials released in connection with the 30-day notice published in the Federal Register on November 27, 2019.

PACE CNY has been delivering services in Onondaga County in Upstate New York since 1997. We have two centers located in North Syracuse and East Syracuse that provide care to over 650 frail elderly participants with an average age of 81 years. Our program has three full Interdisciplinary Teams (IDTs) with two situated in the East Syracuse location. We are a seasoned program with a sound audit record.

PACE CNY is a member of the National PACE Association (NPA) and would like to express its support for NPA's comments on the PACE 2020 Audit Protocol. Rather than repeating them here in detail, we refer you to NPA's comment dated December 19, 2019. Briefly, we are supportive of NPA's comments that:

- (1) recognize and express appreciation for CMS' careful consideration of NPA's and others' comments in response to the 60-day notice on the PACE 2020 Audit Protocol materials;
- (2) request that CMS further reduce the scope of required Impact Analyses (IAs), particularly for larger PACE organizations for which data on fewer than 50% of participants or staff would give auditors a clear understanding of compliance issues;
- (3) request that auditors select overlapping samples of participants or staff in instances when multiple IAs are required of PACE organizations;

(4) request that CMS reconsider its use of the On-Site Observation Participant List to identify participants for on-site observation and, minimally, limit the number of participants for whom data are required; and

(5) request that CMS implement the audit protocol such that (a) auditors will exercise reasonable discretion in requiring Root Cause Analyses and IAs rather than requiring them in virtually all instances of non-compliance observed in sample cases; and (b) steps will be taken to reduce, when possible, auditors' requests to upload documentation in HPMS.

We appreciate your consideration of our input. If you have any questions, please contact Donna E. White, MS RN at dwhite@lorettosystem.org and 315-413-4595.

Sincerely,

A handwritten signature in cursive script that reads "Donna E. White". The signature is written in dark ink and is positioned above the printed name and title.

Donna E. White, MS RN
Director of Quality Management