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December 20, 2019

Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS—10631 (OMB control number: 0938-1326)
<http://www.regulations.gov>

RE: CMS—10631 (OMB control number: 0938-1326)—The PACE Organization Application Process in 42 CFR Part 460

PACE Southeast Michigan is pleased to submit comments in response to the Centers for Medicare and Medicaid Services' (CMS) request for comment on the PACE Organization Application process that was published in the Federal Register on October 29, 2019.

Established in 1994, PACE Southeast Michigan has been caring for senior participants in southeast Michigan for 25 years. As the pioneer PACE program in Michigan, we are now the largest and fastest-growing PACE program in the state. As a result, we have ample experience with expansion applications having opened or moved six centers in the last six years.

We serve seniors in Wayne, Oakland, and Macomb Counties at six centers located in Detroit, Southfield, Warren (moving to Eastpointe), Dearborn, and Sterling Heights. A seventh center in Pontiac is currently under construction and should be ready to serve participants in the second quarter of 2020.

As you can see, the need for PACE in our community is vast. We currently have a census of almost 1,200 participants. Our program has grown 25% percent over the three last years. The ability to open centers quickly directly affects our ability to serve more seniors who can benefit from our care.

PACE Southeast Michigan is a member of the National PACE Association (NPA); and we support the comments on the PACE organization application process submitted by NPA with some additional comments of our own. In particular, we want to emphasize our support for NPA's recommendations related to service area expansion applications and the importance of distinguishing between applications submitted by POs in order to open new PACE centers in existing service areas and those to expand their geographic service areas. While we are also supportive of NPA's request to allow POs to have more than one new PACE center or service area expansion application under CMS review concurrently, we would request further streamlining that process to allow POs to submit one application for two centers that will be opened within one year. As our program has grown, we find that many of the materials submitted in each application

are the same. In the past, when we opened two centers in one year, it would have been more efficient for CMS to review one application for both centers, thus avoiding redundant reviews of documents that are identical.

Additionally, we request that CMS reduce the review time for center openings after State Readiness Review from 60 days to 30 days. Since there is no onsite visit by CMS to the centers, we feel that 30 days to review the approved Readiness Review is sufficient time. For replacement centers, we request the wait time be removed as the center has, in many cases, been successfully operating for years and is just moving to a new location.

Finally, as PACE programs across the country continue to grow to serve the increase in demand for services, we request the application period be expanded to at least six times per year rather than limiting it to the current four dates per year.

We strongly feel that the above changes in the application process will enhance access to PACE programs while keeping the integrity of the program intact.

Again, thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact Laurie Arora, Director of Public Affairs and Philanthropy at Laurie.Arora@pacesemi.org or 248-556-9199.

Sincerely,

A handwritten signature in black ink that reads "Mary Kummer Naber". The signature is fluid and cursive, with the first name "Mary" being particularly prominent.

Mary Kummer Naber
President and CEO