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Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: CMS-4182-P
P.O. Box 8010
Baltimore, Maryland 21244-8010

Dear Centers for Medicare and Medicaid Services,

Thank you for the opportunity to comment on **Contract Year 2019 Policy and Technical Changes to the Medicare Program (CMS-4182-P)**. Idaho has experienced firsthand the benefits of integrated programs for dual eligible beneficiaries and commends the steps CMS has taken to encourage more efficient service delivery systems for this population.

Idaho Medicaid offers a voluntary, opt-in integrated duals program in partnership with Blue Cross of Idaho Care Plus, Inc. (BCI-ICP), and Molina Healthcare of Utah, currently approved to be administered as Fully Integrated Dual Eligible Special Needs Plans (FIDE SNPs). Idaho supports the recommendation of the SNP Alliance that "CMS expand this provision to allow passive enrollment into a D-SNP offered by the same parent organization as their existing Medicaid plan, when a state Medicaid agency is passively enrolling members into a mandatory Medicaid LTSS plan, allowing for both an opt out process and a special election period as proposed here, consistent with most Medicaid procedures."

Idaho further recommends that CMS consider expanding flexibility to passively enroll members from other service delivery structures into a DSNP while having appropriate protections in place for continuity of care and beneficiary choice. Permitting passive enrollment of beneficiaries into a DSNP from a fee-for-service or other delivery system would enhance the state's ability to ensure duals are served in the most efficient system possible, resulting in better coordinated care and improved participant outcomes.

Sincerely,

MATT WIMMER
Administrator

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