



Aging & In-Home Services OF NORTHEAST INDIANA

March 5, 2018

Seema Verma

Administrator, Centers for Medicare and Medicaid Services (CMS)
Department of Health and Human Services, P.O. Box 8010
Baltimore, MD 21244

RE: CMS-2017-0163-0007: Advance Notice of Methodological Changes for Calendar Year (CY) 2019 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies and 2019 Draft Call Letter

Dear Administrator Verma,

Aging & In-Home Services of NE Indiana appreciates the opportunity to comment on CMS-2017-0163-0007, the Advance Notice of Methodological Changes for Calendar Year (CY) 2019 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies and 2019 Draft Call Letter. **We comment specifically on the proposed revisions to the definition of “health related supplemental benefits.”**

We are firmly in support of the new CMS interpretation of “health related supplemental benefits,” where the call letter states that “in order for a service or item to be ‘primarily health related,’ it must diagnose, prevent, or treat an illness or injury, compensate for physical impairments, act to ameliorate the functional/psychological impact of injuries or health conditions, or reduce avoidable emergency and healthcare utilization.”

As an organization that has stepped forward to build statewide, regional, and now national partnerships with the health care community to serve complex patients, we feel that it is important to break down the barriers between health care organizations and community-based organizations, leveraging existing networks to address social determinants of health. The services community-based organizations provide are effective, low-cost, and meet the “Triple Aim”: they improve the patient experience of care (including quality and satisfaction), improve population health, and reduce the per capita cost of health care. By providing services that keep older adults at home and in their communities, these organizations truly meet the new interpretation.

Thank you for recognizing the value of these services, and please let us know if we can provide you with any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Connie Benton Wolfe".

Connie Benton Wolfe
President & CEO