



March 5, 2018

Seema Verma, Administrator  
Centers for Medicare and Medicaid Services  
Department of Health and Human Services  
Attention: CMS-2017-0163  
P.O. Box 8013  
Baltimore, MD 21244-1850  
<https://www.regulations.gov>

**RE: 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:

I am pleased to submit this letter on behalf of Mercy LIFE, Inc. in response to CMS' request for comment on the Advance Notice of Methodological Changes for CY 2019 for MA Capitation Rates, Part C and Part D Payment Policies (Advance Notice) and 2019 draft Call Letter.

Mercy LIFE, Inc. is a Program of All-Inclusive Care for the Elderly that has operated in West Springfield, MA for four years. Today, we serve 238 Medicare beneficiaries, all of whom have significant and complex chronic medical conditions in addition to functional and/or cognitive impairments. We are responsible for providing all Medicare (and Medicaid) covered services for our exclusively nursing home eligible, typically dual eligible participant population. Utilizing a participant-centered, interdisciplinary team approach to assessment, care planning and service delivery, we comprehensively address our participants' needs for preventive, primary, acute and behavioral health care, as well as long term services and supports.

Mercy LIFE, Inc. would like to express its support for the comments submitted by the National PACE Association (NPA) on behalf of its members. We believe NPA's comments address the issues of greatest importance to PACE organizations, most importantly, the need for CMS to reconsider its proposed normalization factor for PACE in CY 2019. We would very much appreciate CMS' consideration of NPA's recommendation to utilize a different timeframe for calculating the normalization factor for CY 2019 which would reduce the normalization next year, and to then proceed with efforts to recalibrate the PACE CMS-HCC model in future years to reduce the impact of the normalization factor on subsequent years' risk scores and payments. If the normalization factor proposed by CMS for CY 2019 is implemented, we are very concerned about its impact on our CY 2019 payments.

Thank you for your consideration of our input. If you have questions or need for follow-up, I can be contacted at [joe.larkin@sphs.com](mailto:joe.larkin@sphs.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Joseph Larkin", is written over a horizontal line.

Joseph Larkin  
Executive Director