

ACAP

Association for
Community Affiliated Plans

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Darnell Dent, Chairman | Margaret A. Murray, Executive Director

July 12, 2007

The Honorable Charlie Rangel, Chairman
House Ways and Means Committee
1102 Longworth House Office Building
Washington, DC 20515

The Honorable John Dingell, Chairman
House Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Jim McCrery, Ranking Member
House Ways and Means Committee
1139E Longworth House Office Building
Washington, DC 20515

The Honorable Joe Barton, Ranking Member
House Energy and Commerce Committee
2101 Rayburn House Office Building
Washington, DC 20515

Sent Via E-Mail

Dear Msrs. Rangel, Dingell, McCrery, and Barton:

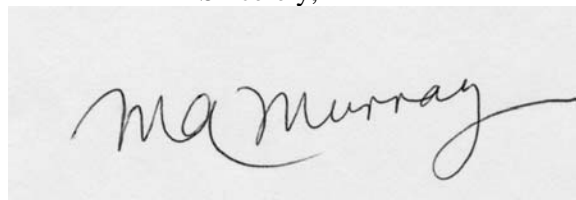
The Association for Community Affiliated Plans (ACAP) sent you a letter on June 28, 2007 outlining ACAP's general suggestions for a model of standards of care for health plans participating in the Medicare Advantage Special Needs Plans (SNP) program. Attached to this letter are four specific areas where ACAP believes the SNP program can be strengthened to ensure that the real needs of special needs populations, and particularly those populations enrolled in dual eligible SNPs, are met by these plans.

These four areas address the:

1. Extension of the SNP program until 2012;
2. Creation of statutory standards for dual eligible SNP plans, including:
 - a. Ensuring plans' capacity to coordinate Medicaid and related social services by having a Medicaid contract with the state or to demonstrate the plan's ability to demonstrate expertise in coordination of services,
 - b. Requiring coordinated care management models that meet the unique needs of the dual eligible beneficiaries served by the plan;
3. Establishment of new reporting requirements for dual eligible SNPs; and
4. Creation of an office within CMS to ensure integration of Medicaid and Medicaid for enrollees in SNPs.

As always, ACAP stands prepared to work with you to help maintain and improve the quality and effectiveness of the Medicare SNP program and ensuring that beneficiaries are best served by SNPs. Please do not hesitate to contact me if my staff or I can be of any further assistance.

Sincerely,



Margaret A. Murray
Executive Director

Cc: Senate Finance Committee

**ACAP Proposals for Medicare Advantage Special Needs Plans
Serving Dual Eligible Beneficiaries**

Extend MA Special Needs Plan Authority

Extend MA Special Needs Plan authority for three years from January 1, 2009 to January 1, 2012.

Create Standards for MA Special Needs Plans Serving Dual Eligible Beneficiaries

Specialized MA Plans for Special Needs Individuals serving dual eligible beneficiaries shall be required to meet the following standards in order to be designated as SNPs:

(1) Special Needs Plans that serve dual eligible beneficiaries must demonstrate the capacity to deliver or coordinate Medicaid services and related social services. Such capacity can be demonstrated by meeting any one of the following criteria:

- (A) A contract with the State Medicaid Agency to deliver Medicaid services to dual eligible beneficiaries who are also enrolled in the plan's specialized MA plan serving special needs individuals.
- (B) Other means as determined by the secretary that demonstrates the plan has the core competencies, staff expertise, and dedicated resources to meet the health needs of dual eligible beneficiaries, including but not limited to:
 - Linguistically and culturally appropriate communications, both written and telephonic;
 - Capabilities to assist beneficiaries with Medicaid and Medicare eligibility;
 - Ability to link beneficiaries with community based social services;
 - Ability to assist beneficiaries in coordinating Medicare, Medicaid and social service supports through the plan;
 - Complex care management services appropriate for meeting the health needs of dual eligible beneficiaries;
 - Mental health care management services appropriate for meeting the health needs of dual eligible beneficiaries.

(2) Complex Care Management Model – Specialized MA plans serving special needs individuals shall have a care management model which is appropriate to the needs of dual eligible beneficiaries served by the plan.

New Reporting Requirements for SNPs

Specialized MA Plans for Special Needs Individuals serving dual eligible beneficiaries shall report on process measures and outcomes data that reflect the effectiveness of care management models for dual eligible beneficiaries.

Authority to Advance Medicare and/Medicaid Integration

The Secretary shall establish an Office on Medicare/Medicaid Integration to align Medicare and Medicaid administrative and oversight rules and financial incentives to the Medicare and Medicaid programs with the goals of simplifying beneficiary access; improving care continuity; eliminating inappropriate cost shifting across programs and providers; eliminating regulatory conflicts between Medicare and Medicaid rules; improving total cost and quality performance for SNPs. This proposal was originally developed by the SNP Alliance and is endorsed by ACAP.