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IN COMMENTS TO CMS, ACAP EXPRESSES STRONG SUPPORT FOR PROPOSED CHANGES TO RISK ADJUSTMENT FOR DUAL ELIGIBLES

WASHINGTON – The Association for Community Affiliated Plans (ACAP) today submitted <u>a comment letter</u> to the Centers for Medicare & Medicaid Services (CMS) that details the support of Safety Net Health Plans for proposed changes to the risk adjustment system for health plans serving people who are dually eligible for Medicare and Medicaid.

In a memorandum releaseda October 28, CMS came to the conclusion that the Medicare Advantage (MA) risk-adjustment system under-predicts the costs of full-benefit dual eligibles, or people who qualify for full Medicaid benefits due to their low incomes and their health status. In the memorandum, CMS proposes changes to risk-adjustment model that would improve the accuracy of payments to plans for their full-benefit dual-eligible enrollees. CMS' analysis shows that their proposed changes would improve the accuracy of the risk-adjustment model for both aged and disabled full-benefit dual eligibles.

"For years, plans that have primarily served the most challenging dual-eligible populations have been operating at a competitive disadvantage that CMS addresses in their October 28 memo," said ACAP CEO Margaret A. Murray. "We believe the changes proposed by CMS will improve the accuracy of payments to plans serving full-benefit dual eligibles and we support them fully; CMS should implement these changes as soon as possible for both Dual-Eligible Special Needs Plans and Medicare-Medicaid Plans."

In the comment letter, ACAP calls upon CMS to implement the changes to its risk adjustment model by 2017 for Dual-Eligible Special Needs Plans, and in 2016 for Medicare-Medicaid Plans operating in Financial Alignment Demonstrations.

The <u>letter</u> is available in full at <u>www.communityplans.net</u>.

About ACAP

ACAP represents 61 nonprofit Safety Net Health Plans in 24 states, which collectively serve more than fifteen million people enrolled in Medicaid, Medicare, the Children's Health Insurance Program (CHIP), and other public health programs. For more information, visit www.communityplans.net.

Information from ACAP about "churn" is online at www.coverageyoucancounton.org.

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