

July 18, 2012

Ms. Melanie Bella
Director, Medicare-Medicaid Coordination Office
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 315H-01
200 Independence Ave, SW
Washington, D.C. 20201

Dear Ms. Bella:

Thank you for the opportunity to provide comments on the state dual eligible demonstrations. As consumer advocates representing dual eligibles, we appreciate your willingness to receive feedback on these projects. We are excited about the demonstrations and would like them to succeed. There are, however, several key issues that we believe require attention to prevent negative outcomes for dual eligible individuals and the overall demonstrations. These areas are: 1) Specificity/clarity of state proposals, 2) Size/scope, 3) Enrollment, 4) State readiness, 5) Plan readiness, 6) Plan quality, 7) Continuity of care and transitions, 8) Quality measurement, 9) Oversight and evaluation, and 10) Rebalancing and reinvestment of savings.

The following includes a summary and detailed description of our recommendations. We would appreciate the opportunity to discuss these issues with you further, and will contact your office soon to request a meeting.

Thank you so much for your office's many efforts to improve the health care provided to the dual eligible population.

Sincerely,

American Association on Health and Disability
American Network of Community Options and Resources
Association of University Centers on Disabilities (AUCD)
B'nai B'rith International
Center for Medicare Advocacy, Inc.
Community Catalyst
Direct Care Alliance
Disability Rights Education and Defense Fund
Easter Seals
Families USA
Leading Age
Lutheran Services of America Disability Network
Medicare Rights Center
Mental Health America
National Academy of Elder Law Attorneys

National Alliance on Mental Illness
National Association for Hispanic Elders
National Association of Area Agencies on Aging
National Association of Nutrition and Aging Services Programs
National Association of Professional Geriatric Care Managers
National Association of State Long-Term Ombudsman Programs
National Caucus and Center on Black Aged, Inc.
National Council for Community Behavioral Healthcare
National Council on Aging
National Committee to Preserve Social Security and Medicare
National Health Law Program
National Senior Citizens Law Center
Older Women's League
PHI – Quality Care through Quality Jobs
Services and Advocacy for Gay, Lesbian, Bisexual & Transgender Elders (SAGE)
The Arc
The National Consumer Voice for Quality Long-Term Care
United Spinal Association

cc: Marilyn Tavenner
Richard Gilfillan
Cindy Mann
Jonathon Blum