

July 29, 2021

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 445-G 200
Independence Avenue, SW
Washington, DC 20201

Dear Administrator Brooks-LaSure:

The Special Needs Plan (SNP) Alliance congratulates you on your confirmation as Administrator of the Centers for Medicare and Medicaid Services (CMS). We look forward to working with you and your team on the pressing issues facing Medicare and Medicaid beneficiaries, specifically individuals with complex care needs. We are so pleased that you bring both a knowledge of the work of the SNP Alliance and have such extensive experience in addressing the broad needs of the populations our members serve.

As a national nonprofit organization, the SNP Alliance has been a leading voice for more than seventeen years for improving policy and practice for high risk and complex needs populations through special needs plans (SNPs), Medicare-Medicaid Plans (MMPs), and other specialized managed care programs. Our membership consists of 27 health plans with enrollment of over 2.4 million lives, totaling almost 60% of nationwide enrollment in special needs plans, including 52% of D-SNP contracts (51% of FIDE SNPs and 62% of HIDE SNP).

We seek to ensure all Americans with complex needs have access to care and support. As you know, special needs populations include those with medical, behavioral, functional, and socio-economic conditions which can limit health, as well as those dually eligible for Medicare and Medicaid, where lack of alignment between programs further exacerbates already complex care needs. We seek to improve policy and practice to integrate and coordinate care and support across programs and services, and are working toward policy and regulation that recognizes and accommodates these individuals—so their conditions and characteristics are reflected in case mix models, quality measures and methods, and plan requirements. We are particularly focused on advancing Medicare and Medicaid program alignment and care integration across settings and providers and promoting equitable performance evaluation.

Current Issues Raised by our Members for CMS Consideration:

We would like to explore the following current areas of concern, based on direct input from our members. These are a few examples of current challenges faced by plan members that appear to require regulatory changes to address. The SNP Alliance is happy to provide further details, as requested.

1. **Audio-only Telehealth Services** – Extend the regulatory policy which provides audio-only services to individuals – this is particularly important for people without reliable access to Wi-Fi/broadband, smart phones, or devices with cameras. Our suggestions are to:
 - a) *Extend the risk adjustment policy outlined in the April 10, 2020, HPMS memorandum post PHE.*
 - b) *Allow audio-only telehealth for MAOs after the PHE expires.*
 - c) *Explore within CMS ways to capture appropriate coding for audio-only when providers are serving those with complex needs who do not have internet or smart-phone device for two-way visual and audio connection.*

2. **Public Health Emergency Flexibilities** – Clarify protections and flexibilities that were put into place during the PHE – particularly those which most impact special needs populations—and clarify which protections, flexibilities and regulatory changes will be extended or made permanent, and for what time period (if not permanent).
3. **Home and Community-Based Services Priorities** – Signal how CMS will work with States and stakeholders to support the expansion and reform of home and community-based services to better serve special populations and communities across the nation, including regulatory reforms and guidelines, aligned quality measurement, and access and service standards.
4. **Alignment of Medicare and Medicaid**—Our members have made significant investments in integrated programs for people with dual eligibility, but administrative complexities and lack of state knowledge and resources remain common barriers to further progress. We look forward to continued discussion around the following:
 - a) *Can CMS share insights on next steps for program alignment?*
 - b) *Is CMS considering addressing some of the remaining administrative barriers through further regulatory action?*
 - c) *What role will this administration play in providing a forum for consensus on future policy options for advancing integrated programs?*

The SNP Alliance thanks you for the ongoing work CMS does to support America’s Medicare and Medicaid beneficiaries. We would be delighted to meet with you and/or your team by phone, video or in person to discuss these or other issues. We hope to be a partner with your Agency around improving the lives of special needs beneficiaries.

Thank you for your time and consideration, and again, congratulations on your confirmation!

With Best Regards,



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