



November 3, 2014

VIA Email – PartCandDStarRatings@cms.hhs.gov

Re: Response to Request For Information Concerning D-SNP Model

Thank you for seeking information on this important topic. ONECare by Care1st Health Plan Arizona (H5430) operates a D-SNP plan in Arizona's Maricopa and Pima Counties. We do so in order to simplify the healthcare system for our Medicaid members that are Medicare primary.

As a small plan without the access to researchers and a non D-SNP population in which to compare, we have closely watched the published research from organizations such as Inovalon and National Quality Forum. As you are likely aware, the recently published Inovalon study provides new and detailed evidence that demonstrate dual eligible beneficiaries have significantly different clinical, demographic and socioeconomic profiles compared to non-dual MA members that result in worse performance on a majority of the measures evaluated. The results show that dual eligible members perform significantly worse on 10 of the 18 measures evaluated (56%) and on 6 of the 8 current Star measures studied (75%).

The program is called "Special Needs" for a reason. The enrollees have complex health care issues. In Arizona, dually eligible beneficiaries in our D-SNP plans are, in many cases, served by the same organization for their Medicare and Medicaid benefits. These are our most frail, at-risk and diverse populations. They are senior citizens living in poverty and younger people with physical and cognitive disabilities; they are sicker than the rest of the population; they have mental illness; they are candidates for institutionalization, frequently with severe and debilitating chronic conditions, including Alzheimer's, diabetes and heart disease.

I am hopeful that following your review of these studies and the information that you receive in response to this request for information, that CMS will level the playing field and make changes to the STAR Model to compare D-SNP plans to D-SNP plans. Without such a change to the model, D-SNP plans will likely cease to exist in the near future.

Sincerely,

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