

2008 Special Needs Plan Chronic Condition Panel Summary of Public Comments

The 2008 SNP Chronic Condition Panel was charged to identify the chronic conditions that met the MIPPA-clarified definition of severe or disabling. Following an Open Door Call for the public on September 10, 2008, the Center for Medicare and Medicaid Services established a dedicated electronic mailbox to receive public comments related to the Panel's work. Public comments were accepted during the 30-day comment period from September 10, 2008 to October 9, 2008. A total of 87 public comments were received from the industry, advocacy groups, specialty disease organizations, and individuals.

As the Panelists considered each of the public comments, they diligently applied the MIPPA-mandated criteria to identify the unique set of SNP-specific chronic conditions. These criteria included chronic conditions that: 1) were medically complex; 2) were substantially disabling or life-threatening; 3) had a high risk of hospitalization or other adverse outcome; and 4) needed a specialized delivery system across care domains.

| | Conditions Proposed by Public | Public Comment Synopsis | SNP Chronic Condition Panel Disposition |
|---|--|--|--|
| 1 | Alzheimer's disease | <ul style="list-style-type: none"> Alzheimer's disease and other dementias are often co-morbidities with other chronic conditions. | The Panel recommended this disorder as a SNP-specific chronic condition under the category dementia. |
| 2 | Cancer | <ul style="list-style-type: none"> Care needs are vast. | The Panel recommended this disorder as a SNP-specific chronic condition with the exception of pre-cancer pathology or in-situ status. |
| 3 | Cardiovascular disease | <ul style="list-style-type: none"> Combined cost of healthcare and lost productivity due to CVD exceeds \$300 billion per year. | <p>The Panel recommended the following disorders as SNP-specific chronic conditions under the category cardiovascular disorders:</p> <ul style="list-style-type: none"> Cardiac arrhythmias Coronary artery disease Peripheral vascular disease Chronic venous thromboembolic disorder |
| 4 | Chronic kidney disease | <ul style="list-style-type: none"> Has a high prevalence in the Medicare population. Progression to ESRD results in high Medicare costs (6% of Medicare budget). | The Panel did not recommend this disorder as a SNP-specific chronic condition because it did not meet the MIPPA-mandated criteria. The Panel did recommend ESRD requiring dialysis (see below). |
| 5 | Chronic Obstructive Pulmonary Disease (COPD) | <ul style="list-style-type: none"> Look at HEDIS results nationwide. | The Panel recommended the following disorders as SNP-specific chronic conditions |

| | Conditions Proposed by Public | Public Comment Synopsis | SNP Chronic Condition Panel Disposition |
|----|--|--|--|
| | | <ul style="list-style-type: none"> • Look at what plans already have in place. • Look at diseases having the greatest impact on patient health and health plan financing. | under the category chronic lung disorders: <ul style="list-style-type: none"> • Asthma • Chronic bronchitis • Emphysema • Pulmonary fibrosis • Pulmonary hypertension |
| 6 | Congestive heart failure | No specific justification was submitted by commenter. | The Panel recommended this disorder as a SNP-specific chronic condition under the category chronic heart failure. |
| 7 | Coronary artery disease | No specific justification was submitted by commenter. | The Panel recommended this disorder as a SNP-specific chronic condition under the category cardiovascular disorder. |
| 8 | Dementia | No specific justification was submitted by commenter. | The Panel recommended this disorder as a SNP-specific chronic condition. |
| 9 | Diabetes mellitus | <ul style="list-style-type: none"> • Diabetic patients require care coordination and specialty care, and diabetic care results in significant Medicare costs. • Include all stages of a disease from onset to more advanced stages of illness. | The Panel recommended this disorder as a SNP-specific chronic condition. |
| 10 | End-stage renal disease | <ul style="list-style-type: none"> • Progression to ESRD results in high Medicare costs (6% of Medicare budget). | The Panel recommended this disorder as a SNP-specific chronic condition with the qualification of requiring dialysis by any mode. |
| 11 | Hemophilia and other hematologic disorders | No specific justification was submitted by commenter. | The Panel recommended these disorders as SNP-specific chronic conditions under the category severe hematologic disorders. |
| 12 | HIV | <ul style="list-style-type: none"> • Care needs are vast. | The Panel recommended this disorder as a SNP-specific chronic condition. |
| 13 | Hypertension | No specific justification was submitted by commenter. | The Panel did not recommend this disorder as a SNP-specific chronic condition because it did not meet the MIPPA-mandated criteria. |
| 14 | Lupus | No specific justification was submitted by commenter. | The Panel recommended this disorder as a SNP-specific chronic condition under the category autoimmune disorders. |

| | Conditions Proposed by Public | Public Comment Synopsis | SNP Chronic Condition Panel Disposition |
|----|---|--|---|
| 15 | Mental health disorders <ul style="list-style-type: none"> • Anxiety disorder • Bipolar disorder • Major depression • Schizophrenia • Schizoaffective disorder | <ul style="list-style-type: none"> • Pleased to see consideration given to mental health and functional disorders as well as physical conditions. • Individuals with mental health disorders often experience other co-morbid physical conditions. | The Panel recommended the following disorders as SNP-specific chronic conditions under the category chronic disabling mental health conditions: <ul style="list-style-type: none"> • Bipolar disorder • Major depression • Paranoid disorder • Schizophrenia • Schizoaffective disorder |
| 16 | Metabolic syndrome | <ul style="list-style-type: none"> • Getting metabolic syndrome managed carefully and appropriately can prevent a beneficiary from getting additional disabling diseases. | The Panel did not recommend this disorder as a SNP-specific chronic condition because it did not meet the MIPPA-mandated criteria. |
| 17 | Neurological disorders | <ul style="list-style-type: none"> • Consider spinal cord injury (SCI) and spinal cord related diseases. • SCI are covered under the Americans with Disabilities Act and qualify as severe or disabling. • SCI requires access to specialized care throughout the life span. • SCI result in a high risk for co-morbidities. | The Panel recommended the following disorders as SNP-specific chronic conditions under the category chronic disabling neurologic conditions: <ul style="list-style-type: none"> • Amyotrophic lateral sclerosis (ALS) • Epilepsy • Extensive paralysis (i.e., hemiplegia, quadriplegia, paraplegia, monoplegia) • Huntington's disease • Multiple sclerosis • Parkinson's disease • Polyneuropathy • Spinal stenosis • Stroke-related neurologic deficit |
| 18 | Osteoporosis | <ul style="list-style-type: none"> • Requires chronic care management to prevent additional fractures. | The Panel did not recommend this disorder as a SNP-specific chronic condition because it did not meet the MIPPA-mandated criteria. |
| 19 | Overweight/Obesity | <ul style="list-style-type: none"> • The overweight and obese should be enrolled in the SNP because extra weight can jeopardize the health of patients dealing with other chronic conditions. | The Panel did not recommend this disorder as a SNP-specific chronic condition because it did not meet the MIPPA-mandated criteria. |

| | Conditions Proposed by Public | Public Comment Synopsis | SNP Chronic Condition Panel Disposition |
|----|--|---|--|
| 20 | Paralysis | No specific justification was submitted by commenter. | The Panel recommended this disorder as a SNP-specific chronic condition under the category chronic disabling neurologic conditions. |
| 21 | Stroke | No specific justification was submitted by commenter. | The Panel recommended this disorder as a SNP-specific chronic condition. |
| | | | |
| | Process-related Comments | Public Comment Synopsis | SNP Chronic Condition Panel Response |
| 22 | Criteria for disability | <ul style="list-style-type: none"> • Adopt the International Classification of Functioning, Disability and Health (ICF) criteria | The Panel did not adopt the IFC criteria because the classification system did not meet the MIPPA-mandated criteria for identifying SNP-specific chronic conditions. The charge of the Panel was limited to the MIPPA statute. |
| 23 | Opposition to establishing a list of SNP-specific chronic conditions | <ul style="list-style-type: none"> • Suggested a six-part condition-based framework to guide plans. | The Panel did not recommend this framework because it did not meet the MIPPA-mandated criteria. The charge of the Panel was limited to the MIPPA statute. |