



**MEDICARE DRUG & HEALTH PLAN CONTRACT ADMINISTRATION GROUP**

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DATE: February 24, 2014

TO: PACE Organizations

FROM: Danielle R. Moon, J.D., M.P.A., Director

SUBJECT: Final PACE Level II Reporting Guidance—Effective March 1, 2014

We are pleased to announce the release of the final revised PACE Level II Guidance, which clarifies our requirements for reporting Level II events and reduces duplication. This revised guidance is effective on March 1, 2014.

We released the draft guidance for public comment on May 9, 2013 and received more than 300 comments from PACE organizations, the National PACE Association, and other stakeholders. We have also included best practices and clinical standards from several organizations, as described further in the guidance.

We have made a number of revisions and clarifications in response to comments, including the following:

- **Level II Reporting Guidance Content and Document Structure**  
We revised organized the informational content and structure of the document, alphabetized the incidents and included the definitions in Table 1.
- **Level II Incidents and Reporting Thresholds**  
We revised the definition of pressure ulcer. We were unable to find an industry standard to exclude pressure ulcers for participants with declining chronic conditions.
- **Appendix A – Definition of Terms**  
We made a number of revisions to the definitions, including the definition of pressure ulcer, which now correlates with the definition established by the National Pressure Ulcer Advisor Panel. We have added the definition of “abuse”, using the definition developed by the National Center on Elder Abuse, as the fragile and elderly PACE population is susceptible to abuse. CMS researched abuse from The National Center on Elder Abuse and identified a standard definition.

We have scheduled two Level II overview sessions for PACE organizations and other stakeholders. We will use the overview sessions to provide a summary of the final Level II

guidance and to answer questions. We encourage you to attend one of the overview sessions. The sessions are scheduled as follows:

February 26, 2014	11:30am EST	877-267-1577 passcode 990 229 014
February 27, 2014	12:00pm EST	877-267-1577 passcode 993 872 637

We thank the various stakeholders for their feedback as we finalized the PACE Level II Reporting Guidance. PACE organizations should continue to use the 2010 PACE Level II Reporting Guidance until March 1, 2014. Please direct any questions regarding this guidance to <https://dmao.lmi.org> and submit questions by clicking on “PACE” and then by clicking on “Submit PACE Question”.