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January 28, 2014

Ms. Marilyn Tavenner
Administrator
Centers for Medicare & Medicaid Services
The Hubert H. Humphrey Building
200 Independence Avenue S.W.
Washington D.C. 20201

Re: Methodological Changes for Calendar Year 2015 Medicare Advantage Capitation Rates, Part C and Part D Payment Policies

Dear Administrator Tavenner,

As the Centers for Medicare & Medicaid Services (CMS) prepare to release the 2015 Medicare Advantage (MA) Advanced Rate Notice and Call Letter, the Care Continuum Alliance (CCA) seeks your commitment to holding 2015 MA payment rates flat in order to ensure that the 15 million seniors enrolled in MA will continue to have access to the high-quality care delivery, care coordination, wellness, and prevention services offered through this vital program.

CCA convenes a broad range of stakeholders dedicated to enhancing the health of populations. Through advocacy, research, and education, CCA advances evidence-based population health management strategies. The CCA aims to improve care quality and health outcomes while reducing preventable costs for the healthy and those at risk of or suffering from chronic conditions. Our diverse membership of more than 200 organizations and individuals includes physician groups, nurses, other health care professionals, hospital systems, wellness and prevention providers, population health management organizations, pharmaceutical manufacturers, pharmacies and pharmacy benefit managers, health information technology innovators, employers, researchers, and academics.

Our members provide high-quality care to MA seniors across the country, while achieving health care cost-savings. These seniors receive enhanced, evidence-based services, such as wellness and prevention care and chronic care management, all benefits that are not offered under conventional Medicare Fee-For-Service. MA programs have also demonstrated success in improving the health of America's seniors and helping to reduce overall health care spending.

Although MA provides clear value to seniors, serious funding cuts threaten its ability to continue to deliver high quality care to seniors. The 2014 CMS MA Final Rate Notice imposed a -

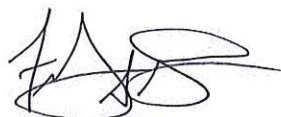
6.7% rate reduction. We have also learned that CMS intends to propose another -6.5% reduction in the 2015 MA Rate Notice, which would force seniors to bear a total -13% cut over two years. By contrast, per beneficiary spending on Medicare FFS has continued to increase during this time. Seniors are already distressed by the fallout from the 2014 MA rate cut which triggered eliminated benefits, loss of access to providers, higher cost-sharing, and market exits. While we understand the need for the Administration to implement controls on health care spending, cutting this program to the point of insolvency does not promote or advance high-quality, value-based health care. CCA strongly urges you to keep 2015 MA payment rates flat, as any cuts will radically undermine the program's ability to continue improving care and reducing costs for seniors.

CCA would be pleased to highlight evidence-based examples of the MA program's success, share additional facts, or provide details on the beneficial outcomes resulting from MA in the lives of America's seniors. For inquiries, please feel free to contact Vicki Shepard at 615-202-2029 Vicki.shepard@healthways.com.

Sincerely,



Vicki Shepard, CCA Government Affairs Chair



Fred Goldstein, Interim Executive Director,
Chair of the Board