



September 17, 2013

Marilyn Tavenner  
Administrator  
Centers for Medicare and Medicaid Services  
U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

Dear Administrator Tavenner,

We are writing on behalf of the National Association of Medicaid Directors (NAMD), which represents the Medicaid Directors in the fifty states, the District of Columbia and the territories. We are submitting to you the enclosed recommendations which we believe would facilitate integration through the Medicare Advantage Dual Eligible Special Needs Plan (D-SNP) program.

We applaud your leadership and commitment to collaborate with states to address the extensive fragmentation that exists between the Medicare and Medicaid programs which has led to uncoordinated care and worse outcomes for beneficiaries and higher costs for federal and state taxpayers. In particular we strongly support the work of the Medicare and Medicaid Coordination Office (MMCO). The financial alignment demonstrations that several states are seeking to implement in partnership with CMS and improvements in Medicare data sharing processes with states are among the noteworthy initiatives already underway.

We also believe that the D-SNP program is another possible pathway for integration that many states wish to pursue. The Memorandum of Understanding between CMS and the state of Minnesota is a promising new development that we hope more states can build upon. The enclosed policy paper, developed through extensive conversations with experts from among our membership, discusses the existing D-SNP integration challenges and makes a broad range of recommendations so that states may more effectively employ the D-SNP platform to facilitate seamless coordination across the continuum of care.

As discussed in our paper, further progress towards D-SNP integration will require a combination of federal legislative and administrative actions focused on reducing barriers



and further supporting state initiatives to drive alignment between the D-SNP program and state Medicaid agencies. NAMD and its members stand ready to work with your agency to move forward on administrative and regulatory changes that would improve the D-SNP program in ways that will result in better care for the dually eligible population and meet our shared desire for more efficient and effective health care delivery systems.

Sincerely,

A handwritten signature in black ink, appearing to read "Darin J. Gordon".

Darin J. Gordon  
TennCare Director  
Department of Finance and Administration  
State of Tennessee  
President, NAMD

A handwritten signature in black ink, appearing to read "Thomas J. Betlach".

Thomas J. Betlach  
Arizona Health Care Cost  
Containment System Director  
State of Arizona  
Vice-President, NAMD

Enc:

“Advancing Medicare and Medicaid Integration: Improving the D-SNP Model for Dually Eligible Beneficiaries”