

# ROCKY MOUNTAIN MS CENTER

— *the answers begin here* —

January 8, 2016

Cynthia Coffman, Esq.  
Attorney General of the State of Colorado  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 10<sup>th</sup> Floor  
Denver, Colorado 80203

Dear Attorney General Coffman:

The Rocky Mountain MS Center (RMMSC) appreciates to opportunity to offer these comments on the Plan of Conversion filed November 7, 2015 by Total Community Options, Inc. d/b/a InnovAge (InnovAge).

The RMMSC's mission is to improve the quality of life of individuals and their families living with MS and related neurological diseases through care, support, education and research. We serve thousands of patients in Colorado each year and believe that a holistic, patient-centered approach that keeps our patients deeply involved in their care will close critical gaps and improve key health outcomes. Our King Adult Day Enrichment Program (KADEP) is an innovative, community-based and cost-effective day program alternative to nursing home placement for younger adults with MS, brain injury and other neurological conditions.

As members of the Chronic Care Collaborative (CCC), we fully support the detailed comments and specific recommendations submitted by the CCC and the Colorado Consumer Health Initiative (CCHI).

InnovAge is a service provider for the Program for All Inclusive Care for the Elderly (PACE), which serves a client base of individuals who are elderly or disabled, but who wish to reside and receive services in the community rather than in a nursing home. PACE clients are usually dually eligible for both Medicare and Medicaid, and these individuals are generally elderly and low-income. Due to the vulnerability of these individuals and because the participants have high needs and are quite dependent on the PACE services, we ask that you exercise an abundance of care in evaluating the proposed conversion. We are concerned about the impact of the conversion on services to PACE participants and the potential that this conversion may result in a reduction of quality.

Due to these concerns, we strongly support all of the detailed recommendations put forth by the CCC and CCHI including those that pertain to the conversion foundation, community advisory committee, proceeds of sale, and post conversion monitoring.

Thank you for your consideration and attention to this important issue.

Sincerely,



Gina Berg  
Chief Executive Officer (CEO)



Michelle King  
Program Director, King Adult Day Enrichment Program