April 24, 2017

Seema Verma, Administrator  
Center for Medicare & Medicaid Services  
PartCDcomments@cms.hhs.gov

Thank you for the opportunity to comment on your request for information on ways to improve the Medicare Advantage program. The beneficiary, mental health, quality measurement and other groups signing onto this letter jointly urge you to improve the program by adding behavioral health measures to the Star Ratings.

Medicare Advantage plans must focus on measures included in the Star Ratings to compete since Star Ratings are tied to plan payment rates. The Medicare Advantage Star Ratings system lacks strong behavioral health measures. We therefore are not seeing progress on behavioral and mental health care results that enrollees urgently need.

Behavioral and mental health conditions are substantially undertreated and strongly associated with greater use of other health care services and thus higher costs. Treatments for many behavioral health conditions also have significant side effects that require careful monitoring and often further treatment. Furthermore, there is often little if any of the coordination between behavioral and other health care providers that is needed for optimal care.

Behavioral and mental health measures can help to address each of these concerns. Adding behavioral and mental health measures to the Star Ratings will make them the priority for Medicare Advantage plans that beneficiaries need them to be. We therefore strongly urge you to include more behavioral health measures in the Star Ratings.

We urge you to work with all stakeholders to determine which behavioral and mental health measures will be most effective additions to the Medicare Advantage Star Ratings system. Thank you again for the opportunity comment on this important issue.

Aging Life Care Association  
American Art Therapy Association  
American Association on Health and Disability  
American Federation of Teachers  
American Foundation for the Blind  
American Mental Health Counselors Association  
American Psychiatric Association  
Campaign for Trauma-Informed Policy and Practice  
Center for Medicare Advocacy  
Global Alliance for Behavioral Health and Social Justice  
Justice in Aging  
Lakeshore Foundation  
Medicare Rights Center  
National Council for Community Behavioral Healthcare  
National Committee for Quality Assurance  
National Council on Aging