



ALZHEIMER'S FOUNDATION OF AMERICA

Our mission is "to provide optimal care and services to individuals confronting dementia, and to their caregivers and families—through member organizations dedicated to improving quality of life."

July 2, 2012

Marilyn Tavenner
Acting Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: CMS-2249-P2
P.O. Box 8016
Baltimore, Maryland 21244-8016

Re: Comments on Proposed Regulations for State Plan HCBS; 77 Fed. Reg. 26362 (May 3, 2012)

VIA ELECTRONIC SUBMISSION

Dear Ms. Tavenner:

On behalf of the Alzheimer's Foundation of America (AFA), a New York-based national nonprofit organization that unites more than 1,600 member organizations nationwide with the goal of providing optimal care and services to individuals confronting dementia, and to their caregivers and families, I am writing to comment on the proposed rule to implement the State Plan Home and Community-Based Services (HCBS) Option/Benefit under Section 1915(i) of the Social Security Act.

Section 441.662 – Independent Assessment

AFA supports the face-to-face assessment and consultation with the individual under the rule and commends the Centers for Medicare and Medicaid Services (CMS) for recognizing the inclusion of a caregiver assessment.

AFA, however, urges CMS to broaden its interpretation of the individual's needs that are to be assessed to encompass cognitive impairment. Language should be added to the rule that specifically addresses the need to assess cognitive impairment. Individuals performing such assessments will need to be sufficiently trained. Many individuals with dementia, moreover, need supervision and cueing or are unable to perform instrumental activities of daily living (IADLs).

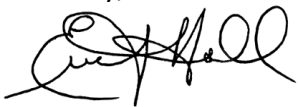
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Cognitive assessment presents the potential for early diagnosis of memory problems and allows families additional time to prepare for the challenges and overwhelming caregiving responsibilities borne by Alzheimer’s disease and related dementias. As the champion of memory screenings, and a strong advocate for the inclusion of cognitive assessment, AFA is concerned that by not including this assessment, the cycle of under-diagnosis and misdiagnosis of Alzheimer’s disease will spin further out of control—especially at a time when 10,000 baby boomers are turning 65 each day, putting them at greater risk for this heartbreaking disease.

Cognitive assessments are a safe, cost-efficient intervention that can reassure the healthy individual, promote successful aging and, when indicated, direct individuals to appropriate clinical resources. Screening tests in general simply help determine whether diagnostic tests should be considered and results do not represent a diagnosis, but individuals with below-normal scores or who still have concerns should be strongly encouraged to follow up for a full medical examination.

AFA appreciates the opportunity to comment on this proposed rule. If you have questions or need further information, please contact Eric Sokol, AFA’s vice president of public policy at (202) 466-0590 or esokol@alzfdn.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric J. Hall". The signature is fluid and cursive, with the first name "Eric" being the most prominent.

Eric J. Hall
President and Chief Executive Officer

