



Department of Organizational Integrity and Regulatory Affairs  
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November 16, 2018

Office of the Assistant Secretary for Planning and Evaluation  
Submitted electronically to: [ASPEImpactStudy@hhs.gov](mailto:ASPEImpactStudy@hhs.gov)

**Request for Information:** IMPACT Act Research Study: Provider and health plan approaches to improve care for Medicare beneficiaries with social risk factors

To Whom It May Concern;

On behalf of Allina Health, I appreciate the opportunity to comment on the Request for Information: IMPACT Act Research Study: Provider and health plan approaches to improve care for Medicare beneficiaries with social risk factors. We applaud the agencies for continuing to reach out to providers on this important topic. While we do have home health, as well as an inpatient rehabilitation and skilled nursing facility that are affected by the IMPACT Act, we also participate in the Accountable Health Communities initiative. As such, we have drawn from our experience across the care continuum in order to help identify what we believe could be useful strategies and best practices in working to address social risk factors.

Allina Health is a family of hospitals, clinics and care services that believes the most valuable asset people can have is their good health. We provide a continuum of care, from disease prevention programs, to technically advanced inpatient and outpatient care, medical transportation, pharmacy, home care, hospice and palliative care services. Allina Health serves communities around Minnesota and western Wisconsin.

Our responses (attachment) to this RFI has been organized to respond to the questions that are most relevant to our interest and experience. We understand a response to every question is not required for our comment(s) to be considered. Please review the attachment with our responses to the questions.

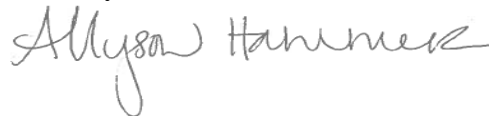
While we believe that addressing social risk factors should occur, there are some barriers we perceive that are worth consideration. First, how entities pose questions to beneficiaries could impact the response they receive. In order to gather information that is meaningful and can be acted upon, it is important to ensure that information is gathered and shared in a clear, consistent manner across the care continuum. Second, identifying information is only the first step. Whose accountability should it be to work with the patient to connect them to resources, as well as to follow them through their journey outside of the healthcare need to ensure that they continue to receive needed services? Coordination in this manner could be costly and time intensive. As

such, appropriate reimbursement would also need to be factored in for the provider that manages this process. Finally, even though a provider may offer resources to a patient, there is no guarantee that the patient will accept and take action to address existing risks. Our experience is that while we can recommend services outside of healthcare that may improve a patient's health status, they often are resistant to taking the steps to receive the needed services.

Allina Health is very interested in considering how to incorporate social risk factors into value based healthcare. As part of that model, we encourage the agencies to share real time information related to social risk factors with providers. We further believe one promising way to address social risk factors is to design beneficiary plans that incentivize implementation of the strategies we have laid out in the RFI.

Thank you for your consideration of our comments as part of this Request for Information. If you have any questions, please feel free to contact me at (612) 262-4908. I look forward to your responses in future rulemaking.

Sincerely,

A handwritten signature in cursive script that reads "Allyson Hammer". The signature is written in black ink and is positioned below the word "Sincerely,".

Allyson Hammer,  
Manager Organizational Integrity, Compliance & Regulatory Affairs  
Allina Health