



November 21, 2006

Centers for Medicare and Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development—C
Attention: Bonnie L. Harkless
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

**Re: Information Collection Request – Evaluation of the Medical Adult
Day-Care Services Demonstration, Phase I**

Dear Ms. Harkless:

AARP appreciates the opportunity to comment on the information collection request for the evaluation of the medical adult day care services demonstration. AARP believes this evaluation should provide useful information to the Centers for Medicare and Medicaid Services (CMS) to help determine the benefits and costs of delivering home health services in the adult day care setting.

As a protection for both the Medicare beneficiary and CMS, and to convey the legitimacy of the survey, we recommend that beneficiaries provide written consent to the in-home interviews in this evaluation. Written consent could be provided prior to or at the time of the interview. While the current methodology calls for potential interviewees to receive a letter from CMS and a call from the researcher prior to the in-person in-home interview, only verbal consent is provided by the beneficiary. AARP believes that written informed consent should be included as a component of the evaluation of this demonstration program.

It is also important that CMS not ask Medicare beneficiaries to provide unnecessary personal or financial information, such as their Social Security number. Due in part to extensive anti-fraud efforts by AARP and others, if our members are asked for such information in a letter or on the phone, they are likely to throw away the letter or not respond. People may hesitate to open the door into their private lives for legitimate survey work or research if they are concerned about possible fraud. The more aboveboard a letter or call appears, the more likely the consumer is to share requested information. We do note that the letter to Medicare beneficiaries about the interview will come from the CMS Privacy Officer on CMS letterhead. This is an improvement over the letter coming directly from the researcher. Steps such as this benefit both Medicare beneficiaries and CMS.

Page 2

Thank you for considering our comments as you finalize the information collection for this evaluation. If you have questions, please contact Rhonda Richards on our Federal Affairs staff at (202) 434-3770.

Sincerely,

A handwritten signature in black ink, appearing to read "David Certner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David Certner
Legislative Counsel and Legislative Policy Director
Government Relations and Advocacy