

September 11, 2023

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Re: CMS-1784-P – Medicare and Medicaid Program: Calendar Year 2024 Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment, etc.

Dear Administrator Brooks-LaSure:

We, the undersigned organizations, write in strong support of the Centers for Medicare & Medicaid Services' (CMS) proposal to pay for caregiver training services in the proposed Calendar Year 2024 Medicare Physician Fee Schedule. We urge you to retain the caregiver training services provisions in the final rule.

Most of us are, have been, or will be a family caregiver or will need help to live independently. This is a nonpartisan and ageless issue. Family caregivers are all ages, races, and ethnicities and cut across all segments of our population. They are the backbone of services and supports in this country, helping older adults, people with disabilities, and veterans live independently in their homes and communities. The physical, emotional, and financial challenges they face in their caregiving roles cannot be overstated, exemplified by a [poll](#) released earlier this year on family caregivers.

Millions of family caregivers provide [\\$600 billion](#) annually in unpaid care to their loved ones. This includes assisting with daily activities such as eating, bathing, dressing, meal preparation, finding and coordinating care, managing medications, transportation to medical and other appointments, performing complex medical/nursing tasks, supporting their loved one through care transitions such as from hospital to home, managing finances, and so much more. The assistance they provide saves taxpayers billions of dollars, such as by helping to delay or prevent more costly nursing home care and unnecessary hospital stays. However, too often, family caregivers do not get the support, including education and training, that they need to take care of the person they are assisting. Six in ten family caregivers are also balancing working with caregiving responsibilities.

We appreciate and support CMS' recognition that practitioners may provide training to more than one caregiver for a single person. This is important, as often more than one caregiver provides care because of caregivers' availability, including due to paid employment. We also encourage CMS to ensure a broad definition of "caregiver" to include caregivers involved in Medicare beneficiaries' care who need the training that would be available under the CMS proposal. Caregivers may need training services for more than one session or more than once in a year by the same practitioner for the same patient, such as due to a change in the individual's

condition, needs, or treatment plan or a change in the caregiver's ability or circumstances. The caregiver training services should also be culturally sensitive, provide caregivers opportunities to ask questions, and address their specific needs. Importantly, the provisions build on the Executive Order on Increasing Access to High-Quality Care and Supporting Caregivers and are consistent with the 2022 National Strategy to Support Family Caregivers.

Thank you again for including caregiver training services provisions in the proposed rule. We urge you to keep these critical provisions in the final Medicare Physician Fee Schedule rule. We look forward to continuing to work with you to support our nation's family caregivers and the people they are assisting. If your staff has any questions, please contact Rhonda Richards (rrichards@aarp.org) in Government Affairs at AARP.

Sincerely,

AARP
ACCSES
ADAPT Montana
Aging Life Care Association®
Alliance for Aging Research
Allies for Independence
ALS Association
Alzheimer's Foundation of America
American Academy of Nursing
American Association on Health and Disability
American Cancer Society Cancer Action Network
American Geriatrics Society
American Parkinson Disease Association
Autism Society of America
Autism Speaks
Autistic Self Advocacy Network
Care in Action
Christopher & Dana Reeve Foundation
Coalition to Transform Advanced Care (C-TAC)
Davis Phinney Foundation for Parkinson's
Diverse Elders Coalition
Elizabeth Dole Foundation
Family Caregiver Alliance
Fight Colorectal Cancer
Gerontological Society of America
Grayce
Healthcare Leadership Council
Japanese American Citizens League
Justice in Aging
Lakeshore Foundation
Long-Term Quality Alliance (LTQA)
Medicare Rights Center

Mom's Hierarchy of Needs, LLC
National Adult Day Services Association (NADSA)
National Alliance for Caregiving
National Asian Pacific Center on Aging (NAPCA)
National Association for Home Care & Hospice
National Association of Councils on Developmental Disabilities
National Consumer Voice for Quality Long-Term Care
National Council on Aging
National Disability Rights Network (NDRN)
National Domestic Workers Alliance
National Hispanic Council on Aging
National Marrow Donor Program/Be The Match
National MLTSS Health Plan Association
National MS Society
National Partnership for Healthcare and Hospice Innovation (NPHI)
National Partnership for Women & Families
National Patient Advocate Foundation
National Respite Coalition
National Spine Health Foundation
Oncology Nursing Society
Parkinson's Foundation
Rosalynn Carter Institute for Caregivers
The Coalition to End Social Isolation and Loneliness
The Michael J. Fox Foundation For Parkinson's Research
Third Way
United Cerebral Palsy
USAging
Village to Village Network, Inc