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**Date:** 9/11/2013 1:33:57 PM  
**Subject:** Question

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Hi Christian –

It was a pleasure to meet you and your colleagues several weeks ago. I know we were all grateful for your time and for the information you shared with us about South Carolina's emerging and exciting strategy on SIBs.

On reflection, I was struck by the simplicity of one of the recommendations that you noted SC had shared with the White House about modifying existing federal funding for states to allow more flexible use of those funds. This could, in effect, be a strategy to get federal funds to States for repayment to investors of any federal savings achieved through a State SIB. You mentioned the HHS Innovations Fund in particular. I wanted to confirm that you were talking about the Center for Medicare and Medicaid Innovation (CMMI), and the funding already appropriated for CMMI.

If so, the following language provides the necessary authority for HHS to make modifications to payment and service delivery models, which looks relevant to our objectives here:

Section 1115A of the Social Security Act (added by Section 3021 of the Affordable Care Act) authorizes the Center for Medicare and Medicaid Innovation to test innovative health care payment and service delivery models that have the potential to lower Medicare, Medicaid, and CHIP spending while maintaining or improving the quality of beneficiaries' care. Under the statute, models must address defined populations for which there are deficits in care leading to poor clinical outcomes or potentially avoidable expenditures. The Secretary of Health and Human Services (HHS) may expand the scope and duration of payment and service delivery models, including implementation on a nationwide basis.

I would appreciate any clarification or additional detail you can share on the recommendations from South Carolina to the federal government on this issue. The NFP National Service Office would like to be helpful and weigh in on this strategy at the federal level to support the recommendations advanced by South Carolina.

Many thanks in advance,

Tamar

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