

January 8, 2016

Cynthia Coffman, Esq.
Attorney General of the State of Colorado
Ralph L. Carr Colorado Judicial Center
1300 Broadway, 10th Floor
Denver, Colorado 80203

RE: Master Plan of PACE Conversion

Dear Attorney General Coffman,

The PACE Conversion Plan could create a transfer of \$186.4 million as per the initial InnovAge PACE Conversion documentation. This valuation seems to be too low and needs to be researched so Colorado citizens are treated fairly in the PACE Conversion. A letter submitted by Colorado Center on Law and Policy (CCLP) suggests that the conversion value may be close to \$400 million. I support having a third party business valuation performed to determine the value.

Next many people think of InnovAge's PACE Program only as "a program that helps seniors stay in their homes." However PACE is also used in Assisted Living locations serving low to moderate income frail seniors. Two locations I know of currently using PACE are the Granville Assisted Living (which accepts Medicaid) and Libby Bortz Assisted Living (does not accept Medicaid but has income restrictions that hold basic assisted living at \$1,840 per month for an individual and \$2,674 per month for couples*).

Website: www.TheGranvilleAssisted.com

Website: www.LibbyBortzAssistedLiving.com

Since 2008 at www.SeniorsResourceGuide.com we have seen a substantial increase in boomers, seniors and family caregivers contacting us by phone and email looking for guidance on affordable senior housing options. Many of these people do not start looking for senior housing solutions until all of their money is gone and they are frail and elderly. I find it interesting that Denver Regional Council of Governments (DRCOG) is offering an event this month (Jan 26, 2016) for professionals on the topic of affordable housing. They will be sharing a new publication called, "**Talking About the Affordable Housing Crisis: Tools for Delivering Bad News.**" This publication is a joint venture of DRCOG, Brothers Redevelopment, Inc. and the Mile High United Way 2-1-1 Help Center. I plan to go and I want to hear what they have to say and what the publication offers in advice for professionals in helping older adults with senior housing solutions.

I am a boomer and I know that at a certain age and lack of activity of daily living, I will not want to be alone in my home at night or during the day. Lack of social stimulation, decreased movement and poor eating habits could accelerate the aging process until skilled nursing was my only option. Telehealth could help me in the home but what I think I would need is social stimulation of living in senior housing with 24/7 support for activities of daily living. Therefore I will consider moving to Assisted Living (AL) while I am still active enough to enjoy the AL lifestyle. When I make that change, I will look forward to the fact that I won't have to cook, worry about cleaning the house, getting the lawn cut, the snow removed, and I will have 24/7 assistance with activities of daily living and plenty of people to talk to and visit with.

The next question is will I be able to afford it? Probably so but many seniors who were adversely affected in the 2008 economic downturn or they just never made a very high income, cannot afford private-pay senior housing. These seniors will need help in the future with affordable housing solutions and financial education on how Medicaid spend down and affordable housing programs work.

In conclusion:

1. The amount of money transferring back to the community from the PACE Conversion appears to be too little. I support having a third party business valuation performed to determine the value.
2. A portion from the PACE Conversion should be used toward encouraging the development of more affordable assisted living housing options for frail low to moderate income seniors who can no longer thrive in their homes.
 - For example could \$100 million of the PACE Conversion be designated towards tax credits for developing assisted living locations that serve low to moderate income seniors?
 - These affordable assisted living locations should not just be in the Denver area.
 - I also suggest that the Tax Credit Funds be directed by a 3rd party independent body knowledge about affordable assisted living housing for seniors.

Thank you for your time and work in researching the PACE Conversion.

Respectfully Submitted, *Karin Hall*

Colorado Business Owner - **303-794-0799**

SeniorsResourceGuide.com, LLC

P.O. Box 237, Littleton, CO 80160

Email: Karin@SeniorsResourceGuide.com

Website: www.SeniorsResourceGuide.com

Website: www.SRGnetwork.com

* Source: Care of Cost Survey 2015, Genworth Financial, Inc. – Average Monthly cost of Assisted Living in Denver, Aurora and Lakewood, Colorado is \$4,250.00.

Link: https://www.genworth.com/dam/Americas/US/PDFs/Consumer/corporate/cost-of-care/118928CO_040115_gnw.pdf