

Draft Update of Chapter 5

Comment/Response Form

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SPECIAL INSTRUCTIONS TO FILLING OUT FORM

- * Please do not use the merge-cell feature of excel (**No exceptions !!!**)
- * Please use only **one** row and five columns per comment
- * Feel free to use the wrap-cell feature
- * Please fill out all five cells for each comment
- * Please submit comments via spreadsheet as requested in the HPMS cover memo

Failure to comply with these simple requests could lead to inadvertent omission of valuable comments

General Section (e.g. 30, 50, 10)	Specific Section (e.g. 30.3, 50.1, 10.2)	Page #	Description of Issue or Comment	Suggested Revision or Comment
10	10.3		Quality Data Reporting Requirements - 42 CFR 422.152(f); 422.516(a) - Each MAO must have effective procedures to develop, compile, evaluate, and report certain measures and other information to CMS, its enrollees, and the general public. In doing so, MAOs are responsible for safeguarding the confidentiality of the doctor-patient relationship. MAOs must report, at the times and in the manner that CMS requires, the following information:	Bullet three in this section lists "availability, accessibility and acceptability of all services". NPAF suggests amending "services" to "Medicare approved and covered services". As CMS is aware, not all services offered by an MA plan are covered benefits by the Medicare program. Some MA plans add additional services such as dental and vision services that are not covered by Medicare benefits under original Medicare guidelines.
10	10.3		Quality Data Reporting Requirements - 42 CFR 422.152(f); 422.516(a) - Each MAO must have effective procedures to develop, compile, evaluate, and report certain measures and other information to CMS, its enrollees, and the general public. In doing so, MAOs are responsible for safeguarding the confidentiality of the doctor-patient relationship. MAOs must report, at the times and in the manner that CMS requires, the following information:	This section also requires MAO plans to "make all collected information available to CMS." NPAF suggests the following revision: "MAOs must make all information collected in response to required reporting measures and other reportable information available to CMS".
20	20.3.2		Evaluation of CCIPs and Scoring Criteria - The evaluation methodology used for review of CCIPs is based on the degree to which the program improves and impacts the health status of the plan members. MAOs can expect to submit and utilize outcome measures for all CCIPs.	NPAF agrees with the evaluation and scoring criteria. We would like to suggest an option which would enable the MA plan to report any corrections made as a result of the review. MA plans stand to benefit from receiving an updated score once corrections are made. We would also suggest charging a fee to any MA plans that make the necessary corrections.

