

Revisions from 30-day Comment Period to CY 2008 Part C Reporting Requirements

Summary:

- Compared to the CY2008 reporting requirements posted for public comment on June 26, 2008 (30-day notice), this document indicates no increased reporting burden as a result of the changes made after the 30 day comment period.

Category	Measure/Item	Change	Effect on reporting burden
Response to Public comments	Benefit Utilization	Added SNPs as a plan type. This was a clarification and involves no increase in reporting.	No effect
Lessons Learned	Benefit Utilization	Added the following data element: total CMS Part A & Part B Rebates collected. This data element was not listed in the previous documentation but it was implied. Therefore, there was no effect on reporting burden.	No effect
Response to Public Comments	Benefit Utilization	Added that reporting is at the PBP level. This is a clarification and involves no increase in reporting.	No effect
Response to Public Comments	Benefit Utilization	Changed the data element term “net supplemental benefits” to “total supplemental benefits”, because the former term was misleading.	No effect
Response to Public Comments	Benefit Utilization	The filing instructions will be updated to read “only rebates applied to A/B services and additional non-prescription drug benefits are to be included in reporting of rebates,” This change clarifies that all rebates are to be included except for those designated to reducing Part B and Part D premiums.	No effect
Lessons Learned	Benefit Utilization	Changed formulas in Attachment III to reflect change from letter to number identification of columns.	No effect
Response to public comments	Procedures	Added “bone marrow transplants” to the list of procedures. This was included in the calculations of reporting burden but was inadvertently not listed in the list of procedures in the supporting statement. Therefore, there was no effect on reporting burden.	No effect
Response to public comments	Procedures	Clarified that MAOs and PFFS plans already submitting any of these measures via HEDIS® can continue to report these measures through HEDIS® and are exempt from reporting separately on these measures.	No effect
Response to public comments	Procedures	Added to Attachment II that current HEDIS measures that are also in the list include: cardiac catheterization, CABG, prostatectomy, total hip replacement, total knee replacement, partial excision of large intestine, mastectomy, and lumpectomy. Reporting is at contract level. These were clarifications with no effect on reporting burden.	No effect
Response to public comments	Serious Reportable Adverse Events	Added that reporting is at the contract level. This was a clarification.	No effect
Response to public comments	Provider Network Adequacy and Stability	Added SNPs as a plan type. This was a clarification and involves no increase in reporting.	No effect
Response to public comments	Provider Network Adequacy and Stability	Added that reporting is at the contract level. This was a clarification.	No effect
Response to	Provider	Added that Gynecologists and Geriatricians may be	No effect

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Public Comments	Network Adequacy and Stability	considered as PCPs for CMS' reporting requirements as long as providing primary care services are consistent with their provider contracts with the MAO.	
Category	Measure/Item	Change	Effect on reporting burden
Response to Public Comments	Grievances	Added that reporting is at the PBP level. This was a clarification.	No effect
Response to public comments	Organization Determinations/ Reconsiderations	Added SNPs as a type plan. This was a clarification and involves no increase in reporting.	No effect
Response to public comments	Organization Determinations/ Reconsiderations	Added that reporting is at the contract level. This was a clarification.	No effect
Response to public comments	Employer Group Plan Sponsors	Added SNPs as a type plan. This was a clarification and involves no increase in reporting.	No effect
Response to public comments	Employer Group Plan Sponsors	Added that reporting is at the PBP level. This was a clarification.	No effect
Response to public comments	Employer Group Plan Sponsors	Clarified in Attachment II that the organization types are state government, local government, publicly traded organization, privately held corporation, non-profit, church group, and other.	No effect
Response to public comments	Enrollment Verification Calls	Added that reporting is at the PBP level. This was a clarification.	No effect
Response to public comments	Provider Payment Dispute Resolution	Added that reporting is at the PBP level. This was a clarification.	No effect
Regulatory	Agent Compensation Structure	"Agent Commission Structure" term is now replaced with "Agent Compensation Structure"	No effect
Regulatory	Agent Compensation Structure	Excluded MAO licensed marketing representatives who are employees of the MAO from this measure. Added CY 2009 reporting of licensed independent marketing representative compensation for retained enrollees. These two actions have equal but opposite effects on reporting burden, and, thus, there is no overall effect.	No effect
Regulatory	Agent Compensation Structure	Now cite the new interim final regulation with comments (CMS 4138-IFC2) addressing agent/broker compensation. This rule was published November 10, 2008	No effect
Response to public comments	Agent Compensation Structure	Added that reporting is at the contract level. This was a clarification.	No effect
Response to public comments	Agent Compensation Structure	Added SNPs as a type plan. This was a clarification and involves no increase in reporting.	No effect
Response to public comments	Agent Training and Testing	Added to Attachment II that reporting frequency is once per year. This is a clarification.	No effect
Response to public comments	Agent Training and Testing	Added to Attachment II that reporting is at the contract level. This was a clarification.	No effect
Response to	Plan Oversight of	Added SNPs as a type plan. This was a clarification and	No effect

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public comments	Agents	involves no increase in reporting.	
Response to public comments	SNPs Care Management	Added that reporting is at the PBP level. This was a clarification.	No effect