## **Justification for Nonsubstantive Change**

Collection of Encounter Data from Medicare Advantage Organizations,
Section 1876 Cost HMOs/CMPs, Section 1833 Health Care Prepayment Plans (HCPPs), and
PACE Organizations
CMS-10340, OMB 0938-1152

Members of the contract that were officially accountable for the MAO (Medicare Advantage Organization) frequently change, thereby making it difficult to confirm whether the information is correct when data is distributed to the contract.

To avoid data breaches which occur when data is sent to the wrong individual or when data cannot be sent because management has changed, the currently approved process is handled by e-mail. When changes are required, a paper form is completed, signed, and returned to the contractor.

The process associated with this nonsubstantive change is still an e-mail process. However, with this change the plan would receive an e-mail which provides a hyperlink to the MA official's automated report (Contract and Contact Verification Form). If the official is no longer accountable, the official will only need to update the information in the report that is generated when they access the hyperlink. In this regard, the official only needs to update the report online and save it. They no longer need to make changes, print, sign, save, and return the report back to the contractor.

All MAs participating in the Medicare Prescription Drug program are impacted because each has to confirm their participation in the financial reconciliation between the pharmacy and the sponsor. There is no additional burden for completing the process.

Screenshot for a Sample Report is included with this nonsubstantive request.