

Justification for a Non-substantive Change

The requirement for Private Fee for Service Plans to report enrollment verification through a phone call has been suspended due to updated guidance issued in Section 70.7 of the Medicare Marketing Guidelines (MMG). This new guidance was released in June 2014 in the 2015 Medicare Marketing Guidance. The revised guidance enabled Medicare Advantage and Private Fee-For-Service plans the flexibility to pursue other options to complete the enrollment verification process, apart from a phone call. Plans are now permitted to use email, telephone or direct mail. As a result, CMS believes this reporting requirement is no longer a necessary element in monitoring the Part C program. A CMS contractor that prepares the annual report for Part C plans has also confirmed that the number of plans that reported a phone call as a means of enrollment verification in 2015 was zero. We are making this non-substantive change to the Part C Reporting Requirement because unfortunately not all CMS staff was made aware of the suspension of this requirement. This change does not impact the burden estimates of the currently approved package.

The revised Reporting Requirement document is attached to this submission along with a Crosswalk of the changes.