

PUBLIC SUBMISSION

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OK

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General Comment

The agency information collection has several flawed requirements

- 1) States were notified on 12/27/17 about the effective date of 1/1/18
- 2) Instructions subsequently sent as the Appendix was simplistic and did not provide enough detail
- 3) States were informed on 12/7/17 that a FAQ would be published for use - there is no FAQ as of 1/29/18
- 4) States are required to get approval from SPARC, Board and others prior to rate changes - data compiled is compromised by the short notice
- 5) 10661 - indicates that the reporting period states that the data collection is for each Federal Fiscal Year - beginning with Oct
- 6) CMS is requiring a reporting period of Jan 1, 2018 thru Dec 31, 2018 which is in conflict
- 7) The comment period would have been better to be implemented in early 2017 - it is ludicrous for the comment period to be after the reporting period begins
- 8) Our estimated time to research is over 60 hours at this point - not sure where you came up with the time estimate