2016 (old version)	2019 (new version)	Type of Change	Reason for Change	Burden Change
Off-Cycle Submissions- A SNP that makes substantive revisions to its existing approved MOC will submit their off- cycle summary of MOC changes, along with the red- lined MOC, in the Model of Care Module in HPMS for NCQA/CMS review and approval.	revisions to its existing approved MOC will submit their off- cycle summary of MOC changes, along with the red-lined MOC, in the Model of Care	DEL	MOC submissions and based on comments from SNPs and industry advocates to reduce burden on C-SNPs, CMS is eliminating the off-cycle MOC submission process for C-SNPs as believe that the annual C-SNP MOC submissions will eliminate the need for C-SNPs to submit off-cycle	This does reduce burden for C-SNPs in terms of off-cycle submissions, however, C-SNPs have an increase in burden for the renewal MOCs, for which they are now required to submit annually due to the BBA requirements.