Public Comment from:

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We would like to encourage the application process to allow for entities which may operate with multiple TINS as long as those TINS are all enrolled in and eligible to bill Medicare without the need for multiple applications. Due to state laws we operate with legally independent clinics in each state, but would appreciate the ability to apply with one application collectively covering all of our clinics, which are managed and operate as one collective network. We believe allowance for this legal arrangement would allow us to serve members under this pilot in multiple states while providing regionally relevant data regarding the impact of implementation of our program during the pilot.

Program Response:

Thank you for your comment. We are considering whether such an approach is feasible.