2017 (Current version)	2020 (new version)	Type of Change	Reason for Change	Burden Change
PRA Supporting Statement The title of the current COI is *"PACE Quality Data Entry in CMS Health Plan Management System."*	**PRA Supporting Statement** The title was revised to *"PACE Quality Data Monitoring and Reporting."*	REV	CMS revised the title of the supporting statement to align with the current CMS terminology and polices for reporting and monitoring PACE Quality Data.	No impact.
PRA Supporting Statement Language in the current PRA is outdated and does not align with current polices for reporting and monitoring PACE Quality Data.	**PRA Supporting Statement** CMS made overall revisions to the supporting statement.	REV	CMS revised the supporting statement to streamline the language, eliminate outdated and/or extraneous text, and align the terminology with the current polices for reporting and monitoring PACE Quality Data.	No impact.
Frequency for Reporting PACE Quality Data with Root Cause Analysis Under the current PRA, PACE organizations (POs) report PACE Quality data with root cause analysis (RCA) on a quarterly basis, in addition to a 45-day grace period at the end of every quarter. For example, quarter 1 ends on March 31st. therefore, all PACE quality data must be reported by May 15th.	**Frequency for Reporting PACE Quality Data with Root Cause Analysis** CMS is changing the frequency of reporting PACE Quality Data with Root Cause Analysis to occur **within three working days of identifying the incident.**	REV	Under the currently approved PRA, CMS has identified that reporting this type of data on a quarterly basis, rather than on a more expeditious basis, has resulted in missed opportunities for technical assistance, and delays in implementing quality improvement efforts. CMS believes that reporting this data in a more expeditious manner will promote better collaboration, and improve the health and safety of PACE participants.	Burden increase from 2 to 4 hours to account for submitting this data in a more expeditious manner.

Frequency for Reporting Root Cause Analyses Under the current PRA, POs are required to report RCAs on a quarterly basis, in addition to a 45-day grace period at the end of every quarter. For example, quarter 1 ends on March 31st. therefore, all RCAs must be reported by May 15th.	**Frequency for Reporting Root Cause Analyses** CMS is changing the frequency for reporting RCAs to **within 45 days of the incident date**.	REV	Under the currently approved PRA, CMS has identified that reporting RCAs on a quarterly basis, rather than on a more expeditious basis, has resulted in missed opportunities for technical assistance, and delays in implementing quality improvement efforts. CMS believes that reporting this data in a more expeditious manner will promote better collaboration, and improve the health and safety of PACE participants.	Burden increase from 2 to 4 hours to account for submitting this data in a more expeditious manner.

PACE Quality Measures PACE quality measures included in the current PRA package are: Falls, Falls with Injury and Pressure Ulcer Prevalence.	**PACE Quality Measures** CMS removed the PACE quality measures and the associated burden.	DEL	CMS removed the PACE quality measures as we currently collect similar data under the PACE Quality Data reporting requirements, and, these measures were never formally implemented under the current PRA.	Reduction in the burden estimate.
PACE Quality Data Types In the current PRA, PACE Quality Data is referred to as "quality data" and in some instances, the former terms Level I and Level II are used throughout.	**Types of PACE Quality Data** CMS clarified that there are two types of PACE Quality Data, 1). Does not require an RCA, for example appeals, grievances, enrollment data, etc., and 2). Requires an RCA, such as unexpected deaths, falls with injury, etc., and added "PACE" to precede all references to Quality Data. We also removed all outdated references to "Level I and Level II" data.	REV	CMS made this clarification to align the terminology with current polices for reporting and monitoring PACE Quality Data, and to distinguish between the 2 types of data.	No impact
PACE Quality Data, Appendix A Appendix A identifies all incident types under the term PACE Quality Data. Under the current PRA, some of the incident types are outdated, do not mirror industry terminology, and are not part of the current PACE Quality Data reporting thresholds.	**PACE Quality Data, Appendix A** CMS made minor updates to Appendix A to reflect current industry terminology, provide clarification, and align with CMS policies. The list was also revised to reflect alphabetical order.	REV	CMS made these changes to ensure accuracy and align with current polices for reporting and monitoring PACE Quality Data.	No impact

Burden Estimate to PACE Organizations The current PRA calculates the burden estimate for PACE organizations by using the "number of possible data entries/PO," and the "estimated number of data categories per data entry."	**Burden Estimate to PACE Organizations** CMS changed the estimated burden for POs using the "average number of data entries per PO annually," instead of the "number of possible data entries/PO." In addition, we removed the "estimated number of data categories per data entry."	REV	CMS decreased the burden estimate as the process for submitting PACE Quality Data is now less burdensome than previous data collection efforts as all data is now collected by one system and largely through drop down menus VS narrative text. Based on recent HPMS data, CMS changed the estimated burden for POs using the "average number of data entries per PO annually," instead of the "number of possible data entries/PO." We believe this is a more accurate way to estimate the overall burden. Also, we removed the "estimated number of data categories per data entry as we determined that it was not relevant to the burden estimate and that most data categories were reported across all PACE organizations, especially entries regarding PACE Quality Data without RCA.	Overall decrease in the annual burden hours for PACE organizations.
PACE Organization Wage Estimates The current PRA estimates the wages for PO staff to report PACE Quality Data at $36.00/hour.	**PACE Organization Wage Estimates** CMS changed the hourly wage to $69.72/hour based on the U.S. Bureau of Labor Statistics' May 2018 National Occupational Employment and Wage Estimates for industry personnel, and adjusted for fringe and overhead.	REV	The wage estimate for PACE staff in the current PRA did not account for fringe and overhead.	Increased cost to POs.

Burden Estimate to the Federal Government	Burden Estimate to the Federal Government	REV	For accuracy and transparency, CMS increased the burden estimate for the cost incurred by the Federal Government as it was significantly underestimated in the current PRA and didn't take into account the number of POs submitting data to CMS annually, Also, it seemed to be based on one PACE organization, and not the 120 POs in operation at the time. We increased the cost estimate to CMS from $19,205 to $896,439.	Increased cost to the Federal Government.
The current PRA estimated the cost for the Federal Government to review and analyze PACE Quality Data at $19,205.	CMS increased the cost incurred by the Federal Government.			
Number of PACE Organizations in Operation	**Number of PACE Organizations in Operation**	REV	CMS made this change for accuracy purposes.	Increased cost to POs.
The current PRA estimated the burden based on 120 operational PACE organizations.	CMS adjusted the number of POs from 120 to 134.			
PACE Quality Monitoring & Reporting Guidance	**PACE Quality Monitoring & Reporting Guidance**	REV	CMS made these revisions to clearly articulate the changes to the frequencies for reporting PACE Quality Data and to update corresponding resources.	No impact
Outlines the PACE Quality Data reporting requirements and provides relevant resources.	CMS revised the PACE Quality Monitoring & Reporting Guidance Document to streamline the language, reflect changes to the reporting frequencies, and update expired web links.			