

CMS Response to 30 day comments

CMS received only one comment in response to the 30 day PRA package. The commenter from Blue Cross and Blue Shield Association expressed the concern that CMS's approach to collecting additional telehealth benefits data by county creates an increased burden for MA plans. In their comment BCBSA gave an example interpreting CMS's approach to mean if five individual telehealth providers offered dermatology that covered 100 counties, the plan would be expected to report 500 rows listing each individual provider for that specialty (five individual dermatologists times 100 counties served).

CMS disagrees with this comment because it is based on a misunderstanding of CMS' approach. Instead, we are asking plans to list counties and states for each telehealth specialty *type* listed by the plan. In the example listed above, plans would be required to list the 100 counties served by the specialty type dermatology.