

## CMS Response to Public Comments Received for CMS-10340

The Centers for Medicare and Medicaid Services (CMS) received comments from a Medicare Advantage organization (MAO) and an Association related to CMS-10340. This is the reconciliation of the comments.

### **Comment:**

The Centers for Medicare and Medicaid Services (CMS) received one comment from an MAO. The MAO's comments were unrelated to the PRA package and described a specific plan issue with editing and requested clarification surrounding certain policies and processes. Specifically, the commenter reported challenges submitting delete transactions related to the 98320 duplicate edit and provided a suggestion for consideration. The commenter also requested clarification on the submission of unlinked CRRs. The commenter asked when CMS would establish new performance measures and thresholds for encounter data. The comments did not suggest changes to the Collection of Encounter Data from MA Organizations, Section 1876 Cost HMOs/CMPs, MMPs, and PACE Organizations.

### **Response:**

CMS appreciates the suggestion for the editing logic, the request for clarification on unlinked CRRs, and the inquiry on when CMS will establish new performance measures and thresholds for encounter data, although the comments are not the focus of this collection. CMS shall take under advisement the recommendation put forth from this MAO regarding editing logic and should further consultation be required on the other topics, CMS shall contact the commenter.

### **Comment:**

The Centers for Medicare and Medicaid Services (CMS) received one comment from an Association. The Association's comment was unrelated to the PRA package, and instead was a request to update Chapter 7 of the Medicare Managed Care Manual on Risk Adjustment with a public comment period. Specifically, the commenter recommended specific updates be made to the chapter to reflect recent risk adjustment model revisions, updates to include information about encounter data, as well as updates to related risk adjustment and risk score calculation information. The comments did not suggest changes to the Collection of Encounter Data from MA Organizations, Section 1876 Cost HMOs/CMPs, MMPs, and PACE Organizations.

### **Response:**

CMS appreciates the request to update Chapter 7 on Risk Adjustment and shall take the recommendation under advisement, although the comments are not the focus of this collection.