

CMS Response to Public Comments Received for Medicare Outpatient Observation Notice
(MOON), CMS-10611

The Centers for Medicare and Medicaid Services (CMS) received the following comments related to the Medicare Outpatient Observation Notice (MOON, CMS-10611, OMB 0938-1308):

Comment:

The commenter stated that the Medicare Outpatient Observation Notice (MOON) may be overwhelming for elderly and disabled patients and suggested that CMS provide a clearer explanation of the notice and more accessibility options. The commenter also suggested that CMS include a brief verbal explanation requirement or a simplified summary section at the top of the form to aid in clarity.

CMS Response:

We thank the individual for their comments on the MOON and strongly agree with the importance of increasing Medicare beneficiary understanding and accessibility. To this end, CMS modeled the MOON after the Medicare Change of Summary Notice, which was extensively consumer tested for understandability/accessibility. Also, we worked closely with The CMS Office of Communications to ensure use of plain language and improved formatting.

While we appreciate the recommendation to include summary language on the MOON, after being advised that such language distracts from overall content (e.g., individuals typically neglect reviewing complete notices when summaries are available), we opted to forego a summary on the notice itself.

Please note, a verbal explanation of the MOON is required. For additional information concerning MOON requirements, please see CMS regulations: [42 CFR 489.20\(y\)](#) and guidance—Section 400 of [Chapter 30 of the CMS Claims Processing Manual](#) and [MOON/instructions \[www.cms.gov/medicare/forms-notices/beneficiary-notices-initiative](#) and [www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/clm104c30.pdf](#)].