

CMS Response to Public Comments Received for CMS-10945

The Centers for Medicare and Medicaid Services (CMS) received comments from three individuals. This is the reconciliation of the comments.

1. Comment: CMS received a comment from an individual expressing support for CMS's proposal to collect healthcare data to improve quality reporting, transparency, and value-based purchasing while minimizing burden.

Response: Out of scope of the PRA package

2. Comment: CMS received a comment from an individual recommending the development of a standards-based API infrastructure and a continuous quality measurement ecosystem using FHIR.

Response: Out of scope of the PRA package

3. Comment: CMS received a comment from an individual urging CMS to accelerate digital quality measurement and reporting using FHIR across post-acute care programs.

Response: Out of scope of the PRA package

4. Comment: CMS received a comment from an individual recommending mandatory adoption of multiple FHIR implementation guides across delegated entities.

Response: Out of scope of the PRA package

5. Comment: CMS received a comment from an individual suggesting the inclusion of new key performance indicators related to dementia management and intergenerational engagement in post-acute care.

Response: Out of scope of the PRA package

6. Comment: CMS received a comment from an individual recommending the inclusion of delegated and downstream entities in reporting infrastructure using interoperable standards.

Response: Out of scope of the PRA package

7. Comment: CMS received a comment from an individual recommending the use of verifiable legal entity identifiers to improve organizational validation.

Response: Out of scope of the PRA package

8. Comment: CMS received a comment from an individual highlighting lack of interoperability due to reliance on non-digital formats such as PDFs, faxes, and spreadsheets.

Response: Out of scope of the PRA package

9. Comment: CMS received a comment from an individual recommending the replacement of CSV-based terminology exchange with standards-based API solutions.

Response: Out of scope of the PRA package

10. Comment: CMS received a comment from an individual advocating for FHIR-based interoperability across all organizations involved in post-acute care.

Response: Out of scope of the PRA package

11. Comment: CMS received two comments from an individual recommending that value sets be maintained using FHIR terminology services rather than CSV files.

Response: Out of scope of the PRA package

12. Comment: CMS received a comment from an individual recommending mandatory use of FHIR implementation guides by CMS contractors and oversight entities.

Response: Out of scope of the PRA package

13. Comment: CMS received a comment from an individual highlighting fragmentation in Medicaid interoperability and recommending FHIR-based financial workflows.

Response: Out of scope of the PRA package

14. Comment: CMS received a comment from an individual identifying limitations in claims-based measurement and proposing a deterministic coding system.

Response: Out of scope of the PRA package

15. Comment: CMS received a comment from an individual recommending the use of FHIR APIs and structured data capture for post-acute care assessments.

Response: Out of scope of the PRA package

16. Comment: CMS received a comment from an individual advocating for the adoption of computable contracts to improve efficiency and alignment.

Response: Out of scope of the PRA package

17. Comment: CMS received a comment from an individual recommending that computable contract data be exchanged via FHIR APIs.

Response: Out of scope of the PRA package

18. Comment: CMS received a comment from an individual recommending the transition from manual contract processes to computable contracts using APIs.

Response: Out of scope of the PRA package

19. Comment: CMS received a comment from an individual noting administrative burden associated with manual CSV processing and lack of training.

Response: Out of scope of the PRA package

20. Comment: CMS received a comment from an individual recommending that participation in standards development be recognized as a quality improvement activity.

Response: Out of scope of the PRA package