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Administrative Procedures for Chronic and Post-Acute Care Quality Programs (CMS-10945)

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Administrative Procedures for Chronic and Post-Acute Care Quality Programs (CMS-10945)

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Submitter Information

Name: David Rocha

Address:

San Antonio, TX, 78256

Email: drocha3408@outlook.com

General Comment

CMS needs to include delegated entities and downstream entities involved in the chronic and post acute care reporting infrastructure.

Delegated and downstream entities are involved in post acute care reporting for delegated:

- Credentialing
- Care coordination
- Risk adjustment
- Quality reporting
- Utilization management
- Authorizations

The actual pain points of data sharing do occur with delegated:

- Home health
- Network management
- Risk arrangements
- Downstream management

When delegated entities are influencing the transitions within post acute care, interoperable standards based exchange (such as FHIR APIs) need to be completed for real time data sharing.