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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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General Comment

The delegated and downstream entities in chronic and post acute care reporting which exchange only electronic PDFs, electronic faxes, spreadsheets, CSVs, image files are not interoperable, especially when the corporate parent organizations are claiming standards-based interoperability.

The hidden subcontracting layer of delegated and downstream entities (FDRs) shall not be allowed to remain analog while the parent organizations claim digital interoperable compliance.