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Section, Page #	Description of Issue or Question	Suggested Revision/Comment/Question being posed to CMS
CMS-10525/OMB 0938-1264 Pg. 1 and Pg. 2	<p>2020: Proposal: <b>Frequency for reporting PACE Quality Data with Root Cause Analysis: Analysis to occur within 3 working days of identifying the incident.</b></p> <p>Per page 2: There is also confusion over the 2020 proposal which states CMS is changing the frequency for reporting RCA's within 45 days of the incident date. What is correct? 3 working days or 45 days?</p>	<p>Request that CMS please consider clarifying the expected timeframe for the Root Cause Analysis considering the following:</p> <ol style="list-style-type: none"> <li>1. A good RCA would entail that all disciplines in the care circle be present and that details be in the EMR. This would not be feasible in this short period of time.</li> <li>2. Often detailed information is in the hospital record and this would not be available in this short period of time.</li> </ol> <p>Suggest: 7-10 business days</p>