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CMS-372(S) Annual Report on Home and Community Based Services Waivers and Supporting Regulations

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General Comment

The Colorado Department of Health Care Policy and Financing respectfully submits the following comments and questions on the proposed changes to the 372 reporting form for 1915(c) waivers.

This change would seem to facilitate effective data collection for quality reports. Reporting on all performance measures annually would create upfront work but reduce the burden of manually preparing evidentiary reports with 3 years worth of data. The Department seeks clarification on the following:

1. When is the proposed effective date?
2. Will the sections to enter Quality Improvement Plans for PMs that fall below the compliance benchmark be character-limited? We recommend that these sections allow for robust QIPs.
3. Will the Evidence Report timeline be revised? The submission date is September 30 for waiver year (WY) 3 data and the submission of the 372 data is not due until December 31. Colorado has historically not had access to all required PM compliance results, when based on claim data, by the Evidentiary Report deadline and would support shifting this timeline to align with 372 reporting.