



CCA RESPONSE TO THE AGENCY INFORMATION COLLECTION ACTIVITIES: PROPOSED COLLECTION; COMMENT REQUEST ON MEDICARE PART C AND PART D DATA VALIDATION (CMS-10305)

June 23, 2023

Chiquita Brooks-LaSure
Administrator Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-4201-P
7500 Security Boulevard
Baltimore, MD 21244
Submitted via <https://www.regulations.gov/>

RE: Agency Information Collection Activities: Proposed Collection; Comment Request on
Medicare Part C and Part D Data Validation (87 FR 79452)

Administrator Brooks-LaSure,

On behalf of Commonwealth Care Alliance (CCA), we appreciate this opportunity to comment on proposed changes to the Medicare Part C and Part D Data Validation process (42 CFR 422.516(g) and 423.514(j) published in the Federal Register at 88 FR 24990 on April 25, 2023).

Headquartered in Boston, CCA is a multi-state integrated care system influencing innovative models of complex care nationwide. CCA's model is consistently recognized as one of the best in the country at managing whole-person care across the continuum, including full integration of primary and acute care, behavioral health, long-term services and supports (LTSS), and services that address social needs. We advocate for equitable and cost-effective policies that lead to high-quality health care for individuals who need it most.

CCA was a founding plan in the 2004 launch of Senior Care Options (SCO), the first dual eligible demonstration in Massachusetts and the fourth dual eligible demonstration in the nation approved by the Centers for Medicare and Medicaid Services (CMS). Now operating under permanent authority as a Fully Integrated Dual Eligible Special Needs Plan (FIDE SNP), CCA serves more than 13,000 SCO enrollees. For the past three years, our SCO program has received a 4.5-Star rating or better from the CMS Quality Rating System for excellence in quality health care.

CCA was a thought leader in the development and implementation of One Care, the first Medicare-Medicaid Plan (MMP) program implemented through the Financial Alignment Initiative



demonstration and the only such program in the nation exclusively serving dual eligible enrollees aged 21 to 64 at the time of enrollment. CCA's One Care program has been a top-rated MMP for six consecutive years, based on an annual consumer survey required by CMS, and today serves nearly 30,000 enrollees.

In 2021, CCA began a multi-year, mission-aligned geographic diversification growth strategy to extend our proven care model throughout the United States. With newly launched MA plans in Massachusetts and Rhode Island and recent acquisitions in Michigan and California, including D-SNPs in Rhode Island and Michigan, CCA now serves more than 100,000 individuals, including more than 42,000 dually eligible individuals.

CCA strongly opposes CMS' proposal to move the end date of the data validation review period from June 30 to June 15. This would be a 16.7 percent reduction in the amount of time available and therefore represents a significant decrease that would create unnecessary additional pressure on participants. Data validation is an extremely time and labor-intensive process for both sponsoring organizations and data validation contractors and having the last two weeks of June available is crucial for being able to wrap up all tasks and review results before reporting to CMS. We emphatically believe that CMS should leave the end of the review period at its current date of June 30.

We thank you for your consideration of our response and look forward to continuing to work with CMS on these matters.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Michelle Soper', is positioned above the typed name.

Michelle Soper
Vice President, Public Policy
Commonwealth Care Alliance