



Memorandum

To: Office of Strategic Operations and Regulatory Affairs
Centers for Medicare and Medicaid Services

From: Health Alliance Plan of Michigan

Date: June 23, 2023

Subject: Comments on CMS-10401 - Standards Related to Reinsurance, Risk Corridors, Risk Adjustment, and Payment Appeals - OMB Control #0938-1155

Submitted via www.regulations.gov

Health Alliance Plan of Michigan appreciates the opportunity to provide comments and feedback regarding the proposed changes to the risk adjustment program.

We respectfully recommend that the new data elements be implemented as “soft” edits for the first year of implementation. This will help to avoid potential enrollment rejections and the exclusion “aka, orphan status” of enrollees who should be considered as part of the risk adjustment calculation.

Thank you for your consideration of HAP’s comments and recommendations. Please contact ComplianceOffice@HAP.org with any questions or to discuss our recommendation further.