

PUBLIC SUBMISSION

As of: 11/17/25, 2:53 PM
Received: November 09, 2025
Status: Draft
Category: Government - Federal
Tracking No. mhs-ju8g-pcal
Comments Due: November 24, 2025
Submission Type: Web

Docket: CMS-2025-1031
Medicare Outpatient Observation Notice (MOON) (CMS-10611)

Comment On: CMS-2025-1031-0001
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Document: CMS-2025-1031-DRAFT-0002
Comment on CMS-2025-1031-0001

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General Comment

CMS-10611 – Medicare Outpatient Observation Notice (MOON): I welcome the purpose of the MOON in helping patients understand when they are being treated as outpatients rather than inpatients. Too often, patients and families learn later that their status affects the cost of care, rehabilitation options, and coverage, which can lead to confusion and financial hardship. Having a standardized notice supports transparency.

However, from a patient care perspective, I believe the notice should be reviewed for clarity. Many patients receiving observation services are older adults or are in acute medical situations. Some Medicare recipients are legally blind and have no case managers to assist them. The language in the notice, while technically clear, can still be overwhelming in that challenging moment. Adding a brief verbal explanation requirement or a simplified summary section at the top of the form could help patients better understand what the notice means for their care and discharge planning.

I support keeping the MOON but encourage CMS to strengthen its accessibility. A clearer explanation helps ensure informed decision-making and reduces stress during what is often a challenging time for patients and families.