From:	Piper, Kim
To:	FN-OMB-OIRA-Submission
Cc:	Piper, Kim
Subject:	Comments CY2012 Part C and Part D Reporting Requirements Paperwork Reduction Act (PRA) 30-Day Comment Period
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Importance:	High

Hello - we have a question and comment re:
The instructions for Element 4, Provider Network Adequacy, say to "Report the number of providers based on their contracting date, and not credentialing date."

How do we account for providers who move from a solo practice to a contracted group or from a contracted group to solo practice, but remain in the same service area?

Their contracted date would change to that of the new contract they are under, which would disable our ability to count them as on-going/continuous.

Thank you

Kim Piper | GOVERNMENT PROGRAMS PERFORMANCE & AUDIT MANAGER
Government Programs
Group Health Cooperative

PHONE 206-448-2172 | CDS 320-2172
FAX 206-877-0642
E-MAIL piper.k@ghc.org
www.ghc.org

Group Health Cooperative Headquarters
320 Westlake Ave N, Suite 100, GHQ E4N
Seattle, WA 98109

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