

# PUBLIC SUBMISSION

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OR

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## General Comment

COMMENTS BY KAISER FOUNDATION HEALTH PLAN, INC.

CMS Issues Draft CY 2016 Medicare Part C Reporting Requirements for Second Comment

Opportunity - New Reporting section "Payments to Providers"

Submitted October 19, 2015

Kaiser Foundation Health Plan, Inc. and its subsidiary Health Plans ("Kaiser" or "Kaiser Permanente"), all of which are either Medicare Advantage organizations or Medicare Cost contractors pursuant to Section 1876 of the Social Security Act, appreciate the opportunity to comment upon the Draft CY 2016 Medicare Part C Reporting Requirements & Supporting Documents for Second Comment Opportunity to include a proposed new reporting section titled, "Payments to Providers." (See AHIP Medicare Update #15-86b, 9/22/15.) and related supporting documents as announced in the Federal Register notice (80 FR 51276, 8/24/15). Comments are set forth below.

The newly incorporated section titled "payment to providers" are very onerous requirements. Our organization does not catalogue provider contracts in this fashion. Tracking would all have to be done manually. It would also be a significant undertaking to evaluate each contract and include one of these elements and then have to identify costs associated with each provider. Additionally, while the definitions can be found on the CMS.gov web site, we recommend CMS clarify the definitions within the actual reporting requirements and define each payment type.