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General Comment

Although many changes described in the presented documents apply to the BID submission and the tools used, Commonwealth Care Alliance would like to take the opportunity and comment on the work that needs to be done with regard to PBP software for FIDE SNPs. As a FIDE SNP, we feel the immediate need is the ability for the PBP software to accept submission of Medicare & Medicaid covered benefits. The current structure of the PBP requires plans like ours to submit many hard copy changes in order for the Summary of Benefits (SB) to accurately reflect our benefit plan. The additional request for hard copy changes places an onerous burden on us and makes it more difficult for us to meet some of the CMS mailing timeframes. We encourage CMS to work with Medicaid and FIDE SNPs to develop an integrated software program for FIDE SNPs. Commonwealth Care Alliance feels the PBP software used by the Medicare-Medicaid Plans is a first step in developing this software. Additional work is required.