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Part C Medicare Advantage Reporting Requirements and Supporting Regulations in 42 CFR 422.516(a) (CMS-10261)

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Agency Information Collection Activities; Proposals, Submissions, and Approvals

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General Comment

Reporting: Rewards and Incentives

In the past, CMS has expressed itself about the consideration of Rewards and Incentives for part D activities, however at present time plans are not authorized to provide incentives for activities related to part D. CMS also establishes the requirement to concede rewards or incentives based upon processes completed by the patient, rather than outcomes. From this perspective, there are certain processes or activities that the member needs to comply with in order to attain or maintain the optimum health status that are related to part D but have an impact on the utilization and behavior on part C. One simple example is granting rewards for getting refills on time from their pharmacy. This simple process activity impacts directly part C related measures such as Antidepressant Management, Diabetes Blood Sugar Control, and Rheumatoid Arthritis Management, among others. Based on the above, CMS should allow plans to reward members on part D related activities.

Reporting: Organization Determinations/Reconsiderations

What is expected to be included under element 6.33 "Additional information" for Reopenings? Can you please provide an example?

Reporting: Organization Determinations/Reconsiderations

Does CMS expect Plans to include only those reopened cases in which a change of the initial decision is performed? If after proper evaluation of the reopening the decision remains upheld, do we have to report it?