

**From:** Boggs, Wendy (DMAS)  
**To:** [OS OIRA \(HHS/OS\)](#)  
**Subject:** CMS-10630 - Public Comments  
**Date:** Tuesday, December 27, 2016 8:46:57 AM

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Dear Sir or Madame,

Thank you for the opportunity to comment on the 2017 Draft PACE Audit Protocols, CMS-10630.

I would like to offer the following suggestions/comments:

1. ***Attachment I – PACE Audit Process and Data Request, Personnel Impact Analysis Template, Personnel Impact Tab*** – There is a “yes” and “no” option for License. I would like to suggest a “N/A” option be added.
2. ***Attachment I – PACE Audit Process and Data Request, Clinical Appropriateness Impact Analysis Template\_Emergency, Participant Impact Tab*** – In this section the time emergency care was provided is documented in an hour:minute:second format. In several other locations, the “seconds” recording was eliminated. I suggest “second” also be eliminated from this section, requiring only the hour:minute format be recorded.
3. ***Attachment I – PACE Audit Process and Data Request, Clinical Appropriateness Impact Analysis Template\_Restraints, Participant Impact Tab*** – (1) In this section the time the restraining was discontinued is documented in an hour:minute:second format. In several other locations, the “seconds” recording was eliminated. I suggest “second” also be eliminated from this section, requiring only the hour:minute format be recorded. (2) I also suggest it be considered that the time the restraint was initiated be added as an entry.

Again, thank you for the opportunity to comment on the 2017 Draft PACE Audit Protocols.

Regards,

Wendy Boggs

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