

From: Yee-Ling Mui
To: [OS OIRA \(HHS/OS\)](#)
Cc: [Yee-Ling Mui](#); [Federal GR Leadership Team](#); [Janie Carlson](#); [Tracy Hoisington](#)
Subject: CMS comment Request: Three-Year Network Adequacy Review for Medicare Advantage Organizations (CMS – 10636; OMB 0938-New)
Date: Friday, August 18, 2017 5:00:34 PM
Importance: High

To OMB, Office of Information and Regulatory Affairs, Attention: CMS Desk Officer or to whom it may concern:

Thank you for the opportunity to provide comments on the proposed information collections, “Title of Information Collection: Three-Year Network Adequacy Review for Medicare Advantage Organization”, OMB control number: **CMS – 10636; OMB 0938-New** (re: Federal Register/ Vol. 82, No. 137/ Wednesday July 19, 2017/ Notices). Below are UCare’s comments:

UCare understands CMS’ need to ensure Medicare Advantage Organizations (MAOs) have adequate provider and facility networks. Our thoughts on how to make the process for a three-year network adequacy review meaningful, but less administratively burdensome for MAOs, are:

1. Although we understand CMS’ intent to issue HSD upload request letters “preferably in September,” we request that CMS provide MAOs with advance notice on the HSD submissions schedule. We suggest CMS include this guidance as a part of the annual Call Letter. MAOs can, and do, utilize the Plan Initiated Upload Function on the HPMS portal; however, it will be helpful for MAOs to know the timing in order to plan this work and then have the time to authenticate submissions.
2. If a MAO has more than two contracts due for a review in the same year, we request that CMS stagger this process over the course of a submission window. This is particularly important for MAOs with demonstration Special Needs Plans that require annual network adequacy review (in our case, each September).
3. Establish a process in which CMS is able to provide specific feedback to the MAO on Network Adequacy findings. If CMS disallows an exception request, ideally CMS will specify the providers and/or facilities with which the MAO must contract to meet the network adequacy requirements. In addition to CMS providing specific provider/facility feedback to the MAO, CMS should collaborate with MAOs to ensure the accuracy of CMS’ provider data used to assess adequacy.

Thank you for the opportunity to submit comments on this matter,

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Upcoming PTO / OOO dates: Aug 30, Sept 4, 22(after 12pm) **WFH – Thursdays** (Mobile#: 612.644.1763)

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