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December 12, 2017

Submitted via: <http://www.regulations.gov/>

Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: CMS-10305 (OMB Control Number 0938-1115)

To Whom It May Concern:

Health Care Service Corporation (HCSC) appreciates the opportunity to provide comments to the Centers for Medicare & Medicaid Services (CMS) in response to the "Medicare Part C and Part D Data Validation," published in the Federal Register (82 FR 197) on October 13, 2017.

HCSC is the largest customer-owned health insurance company in the United States. The company offers a wide variety of health and life insurance products and related services, through its operating divisions and subsidiaries including Blue Cross and Blue

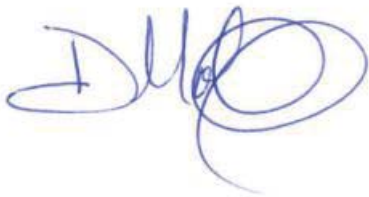
Blue Cross and Blue Shield of Illinois, Blue Cross and Blue Shield of Montana, Blue Cross and Blue Shield of New Mexico, Blue Cross and Blue Shield of Oklahoma, and Blue Cross and Blue Shield of Texas

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proposes to revise the Standards to indicate that the total number of coverage determinations reported (see 5.f.iii) should include withdrawals and dismissals (i.e., Data Elements 2.H and 2.I, respectively). However, we note that for reporting the total number of redeterminations (see RSC 5.g), CMS is not proposing inclusion of withdrawals and dismissals. In addition, we note that in RSC 17 (“Organization accurately calculates the total number of redeterminations (Part D only) ...”), CMS is proposing to require inclusion of dismissals and withdrawals. For clarity, we recommend that CMS specify whether the total number of redeterminations under RSC 5.g should include withdrawals and dismissals.

We appreciate the opportunity to comment. If you would like additional information or have questions about our feedback, please contact me at 202-249-7214 or Dana_Mott-Bronson@hcsc.net.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dana Mott-Bronson', with a stylized, cursive script.

Dana Mott-Bronson
Executive Director, Health Policy – Government Programs