

# PUBLIC SUBMISSION

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(CMS-10261) Part C Medicare Advantage Reporting Requirements and Supporting Regulations

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(CMS-10261) Part C Medicare Advantage Reporting Requirements and Supporting Regulations

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## General Comment

II. ORGANIZATION DETERMINATIONS & RECONSIDERATIONS Data Element B, subsection 1 (Org Deter) CMS has deleted Elements 6.2, yet there does not seem to be any request for counts of timeliness in any of the elements now. Is this an oversight, or do we no longer need to report timeliness?

II. ORGANIZATION DETERMINATIONS & RECONSIDERATIONS Data Element B, subsection 3 (Recon)

CMS has deleted Elements 6.12, yet there does not seem to be any request for counts of timeliness in any of the elements now. Is this an oversight, or do we no longer need to report timeliness?

II. ORGANIZATION DETERMINATIONS & RECONSIDERATIONS All Sections

The familiar element numbering system of 6.1-6.21 etc. is gone. It has been replaced by lettering conventions that repeat

- o Strongly recommend that this be addressed with CMS. This is going to be highly confusing to delegates/submitters for Part C reporting.

- o There is no longer a logical succession, like there was before, of 6.1,6.2, 6.3 etc. it is now A-Z, but not necessarily A-Z, as there are repeating sequences , broken up into sections