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MA

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General Comment

Our organization would has reviewed the 2019 proposed changes to the Part C Reporting Requirements. The draft Part C Reporting Requirements do not contain the Part C Technical Specifications. As CMS has noted, while the Technical Specifications do not change the data to be reported to CMS, they do assist organizations in preparing and submitting accurate datasets to CMS. Can CMS let plans know when the Part C Technical Specifications will be released and will there be any opportunity for plans to comment on the technical specifications before their implementation?

As an example, the drafted Part C Reporting Requirements have the same Data Elements for Special Needs Plans (SNPs) Care Management; however, the inclusion and exclusion details are not available without the Technical Specifications. These inclusion and exclusion details are necessary for the business subject matter experts to review and work with the organization's IT department to determine what code changes and resources are needed to affect those changes for accurate reporting. Without knowing these details and being able to review and provide comment, our organization is unable to agree or disagree with CMS' estimated work effort for the changes made within this document.