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MN

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General Comment

Thank you for allowing us the opportunity to provide comments for the proposed 2019 Part C Reporting Requirements.

HealthPartners is submitting two comments regarding Reporting Section II, Organization Determinations, and Redeterminations.

1) The labeling of elements in each subsection has been updated to the same lettering format. While this is consistent with Part D, we request CMS consider including differentiation in the alpha format to separate each subsection as they all start with the letter "a" and are not differentiated with any numerical values.

2) HealthPartners recommends that CMS consider changing Reporting Section II - Part C Organization Determinations to a file upload from a data entry submission. This would be consistent with the Part D reporting section and Coverage Determinations and Reconsiderations, as well as greatly simplifying the submission process. It would also remove data entry errors and provide the same data to CMS in an easier to use format.