



January 7, 2019

Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: CMS-10565 (OMB No. 0938-1296)
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: CMS-10565 (OMB No. 0938-1296)

Dear Sir or Madam:

We are writing on behalf of America's Health Insurance Plans (AHIP) in response to the notice under the Paperwork Reduction Act (PRA) concerning the "Off-cycle Submissions of Summaries of Model of Care Changes" published by the Centers for Medicare & Medicaid Services (CMS) in the Federal Register (83 FR 55891) on November 8, 2018. Special Needs Plans (SNP) Model of Care (MOC) submissions are of significant interest to AHIP's member organizations, many of which participate in the Medicare Advantage (MA) program. Our comments appear below.

CMS' Supporting Statement included in the PRA materials indicates that Section 50311 of the Bipartisan Budget Act of 2018 (BBA) requires Chronic Condition SNPs (C-SNPs) to submit a MOC on an annual basis for evaluation and approval beginning in 2020. We believe that CMS should consider an approach that implements this new statutory requirement in a way that achieves the goals of the BBA provision while minimizing administrative burdens where possible. To that end, we recommend that CMS consider making revisions to the off-cycle and annual submission requirements for SNP MOCs based on input from plans to streamline documentation and reduce the time and effort needed to meet these requirements. For example, CMS could implement an amendment process so that a plan that has made limited changes to its MOC from one year to the next could opt to provide a summary of and attest to those changes.

We have appreciated the opportunity to comment. Please contact me if additional information would be helpful or if you have questions about the issues or recommendations raised in this letter. I can be reached at (202) 778-3256 or mhamelburg@ahip.org.

Sincerely,

Mark Hamelburg
Senior Vice President, Federal Programs