PUBLIC SUBMISSION

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Agency Information Collection Activities; Proposals, Submissions, and Approvals

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General Comment

We are concerned that the Data Validation standards for the SNP Care Management measure do not align with 2019 Part C Technical Specifications published by CMS. Specifically, we noted the following issues an discrepancies.

(1) When to count members as eligible for a reassessment if there is no initial assessment: In the Data Validation standards, RSC-6.f Includes members who dis-enrolled from and re-enrolled into the same plan if an initial HRA or reassessment was not performed within 90 days of re-enrollment. The enrollee becomes eligible for a reassessment HRA the day after the 90-day initial period expires. However, in the 2019 Part C Technical Specifications (Exclusion criteria under Element B), new enrollees who miss the deadline to complete an initial HRA and have not completed a re-assessment but do not hit the 365 day deadline in the following year are excluded from the corresponding element. The Data Validation standards count the member in this element on day 91 of enrollment, where as the Technical Specifications gives plans a full 365 days before counting members for whom no initial and no re-assessment was completed.
(2) With respect to Members who disenroll and re-enroll, we are requesting clarification on the distinction between the requirements outlined in RSC-7.b and RSC-7.c of the Data Validation standards. The former excludes any HRAs from the previous enrollment for members who have disenrolled and re-enrolled (unless there is no break in coverage), whereas the latter includes

HRAs performed during previous enrollment provided that the assessments are not more than 365 days old. Accordingly, these two elements seem to conflict. Note that the 2019 Part C Technical Specifications are silent on how to treat members who disenroll and re-enroll within the reporting period, which creates an inherent discrepancy with the Data Validation standards.

We urge CMS to take steps to reconcile the conflicting guidance between the Data Validation standards and Part C Technical Specifications to ensure consistent and accurate reporting by plans.