



## Alignment Healthcare

June 21, 2019

Seema Verma, Administrator  
Centers for Medicare and Medicaid Services  
U.S. Department of Health & Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

Dear Administrator Verma,

Thank you for the opportunity to provide comment on CMS' "Medicare Part C Reporting Requirements for 2020 Contract Year" (hereinafter "Telehealth Reporting").

AHCUSA, along with its affiliates (collectively, "Alignment"), is a consumer-centric, population-based healthcare delivery company committed to improving health by aligning the interests of all stakeholders in the health care system, including patients, providers and health plans. Since 2014, AHCUSA has been the parent company of Alignment Health Plan, an HMO licensed health plan in California that solely offers MA HMO Plans to Medicare beneficiaries pursuant to a contract with the Centers for Medicare and Medicaid Services, and currently serves approximately 45,000 enrollees in eight counties.

We appreciate CMS's continuous efforts to improve the Medicare Advantage and Part D Programs and agree with the Agency these programs demonstrate the value of private sector innovation and creativity. Alignment looks forward to CMS' continued efforts to make changes that promote greater innovation, transparency, flexibility, and program simplification.

Please find below Alignment's comments relative to the proposed data elements for Telehealth Reporting.

Sincerely,

Chandra Spitzer,  
Director, Compliance and Regulatory Affairs  
Alignment Healthcare



***Page 1; Data Elements (at the contract level):***  
**Telehealth Reporting/Proposal**

Element Number	Data Elements for Telehealth Reporting
A	Does your organization offer Telehealth either as a standard benefit or through a demonstration? “Yes” or “No” only

**Alignment Comment**

If our organization offers Telehealth as a supplemental benefit, would “Yes” be the appropriate response for Element Number A?

***Page 1; Data Elements (at the contract level):***  
**Telehealth Reporting/Proposal**

Element Number	Data Elements for Telehealth Reporting
D	Total number of contracted Telehealth Providers per contract. Enter_____

**Alignment Comment**

Would CMS be requesting the number of contracted Telehealth Providers at the individual provider / physician / clinician level (i.e. NPI level) or at the contract level (i.e. Tax ID# level). Appendix 1 of the Contract Year 2019 Medicare Part C Plan Technical Specifications included clarification as to how providers would be counted for purposes of the Payments to Providers Part C reporting requirements. Specifically, FAQ #4 on page 38 of this document indicated that providers were to be reported by contracts. FAQ #4 on page 38 stated that if a plan is in a contract with a provider group, the provider group counts as one contracted provider. If the plan is in a contract with an individual provider, the individual provider counts as one contracted provider. Would the same guidance apply to how Telehealth Providers are contracted?



***Page 1; Data Elements (at the contract level):***  
**Telehealth Reporting/Proposal**

Element Number	Data Elements for Telehealth Reporting
E	Total number of contracted in-person providers for this Specialty in this particular county and State. Enter _____

**Alignment Comment**

Would CMS be requesting the number of contracted in-person providers in our network that are not Telehealth Providers for each Specialty, county and state that we offer under Telehealth? For example, if our plan offers general medical, dermatology and mental health services under Telehealth in select counties, is CMS requesting that our plan provide a count of the number of contracted providers in our network in those same counties for each specialty (general medical, dermatology and mental health) who provide these services in the office setting?

***Page 1; Data Elements (at the contract level):***  
**Telehealth Reporting/Proposal**

Element Number	Data Elements for Telehealth Reporting
F	How many of these contracted providers offer both in-person and Telehealth within the same contract? Enter _____

**Alignment Comment**

Would the number entered in Element Number F be the sum of Element Number D plus Element Number E? Or would the number entered in Element Number F represent the subset of the number of contracted Telehealth Providers entered in Element Number D who also provide in-person services?

