Aetna's Comments on 2010 Draft Part C, D and EGWP Applications—October 20, 2008

1. The deadline for the 2010 application submission is more than two weeks earlier than the 2009 applications were due. Aetna has been tracking towards a mid-March filing date. This change in the timeline negatively impacts our network contracting efforts as each year the application deadline is moved forward allowing less time to execute contracts with providers required for the network to meet network adequacy requirements.

2. For the HSD-1 table, are there any guidelines on what types of subspecialties we should pull from the Medicare.gov website to populate the Medicare provider counts for HSD1 (*e.g.;* - if we go to a state and county and pull cardiology, several subspecialties come up, we know there are some that should be ruled out, however we would appreciate CMS developing and providing additional guidance on how to select the appropriate subspecialties to populate HSD1.
2a. Can plans request a provider file from CMS containing the Medicare participating providers available within a county –defined by specialty and number of providers available? If yes, please advise how this type of report can be requested.

3. Facilities new to HSD-1   Are there any look-up guidelines for facilities? Some facilities can be located on Medicare.gov website, however we recommend CMS provide guidance and make available other websites/URL's to assist in identifying all applicable facility counts for a county.

4. How often is Medicare.gov refreshed with updated provider information?